



OCGA Updates

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Office of Contract & Grant Administration

January 2024 RAF

Topics



Foreign subrecipients on
NIH awards



Disclosures: Reminders



Potential Government
Shutdown

Foreign Subrecipients on NIH Awards

January 2024 RAF



Department of Health and Human Services

OFFICE OF
INSPECTOR GENERAL

**THE NATIONAL INSTITUTES OF
HEALTH AND ECOHEALTH ALLIANCE
DID NOT EFFECTIVELY MONITOR
AWARDS AND SUBAWARDS, RESULTING
IN MISSED OPPORTUNITIES TO
OVERSEE RESEARCH AND
OTHER DEFICIENCIES**

*Inquiries about this report may be addressed to the Office of Public Affairs at
Public.Affairs@oig.hhs.gov.*



Christi A. Grimm
Inspector General

January 2023
A-05-21-00025



United States Government Accountability Office
Report to Congressional Requesters

June 2023

**FEDERAL
RESEARCH**

**NIH Could Take
Additional Actions to
Manage Risks
Involving Foreign
Subrecipients**

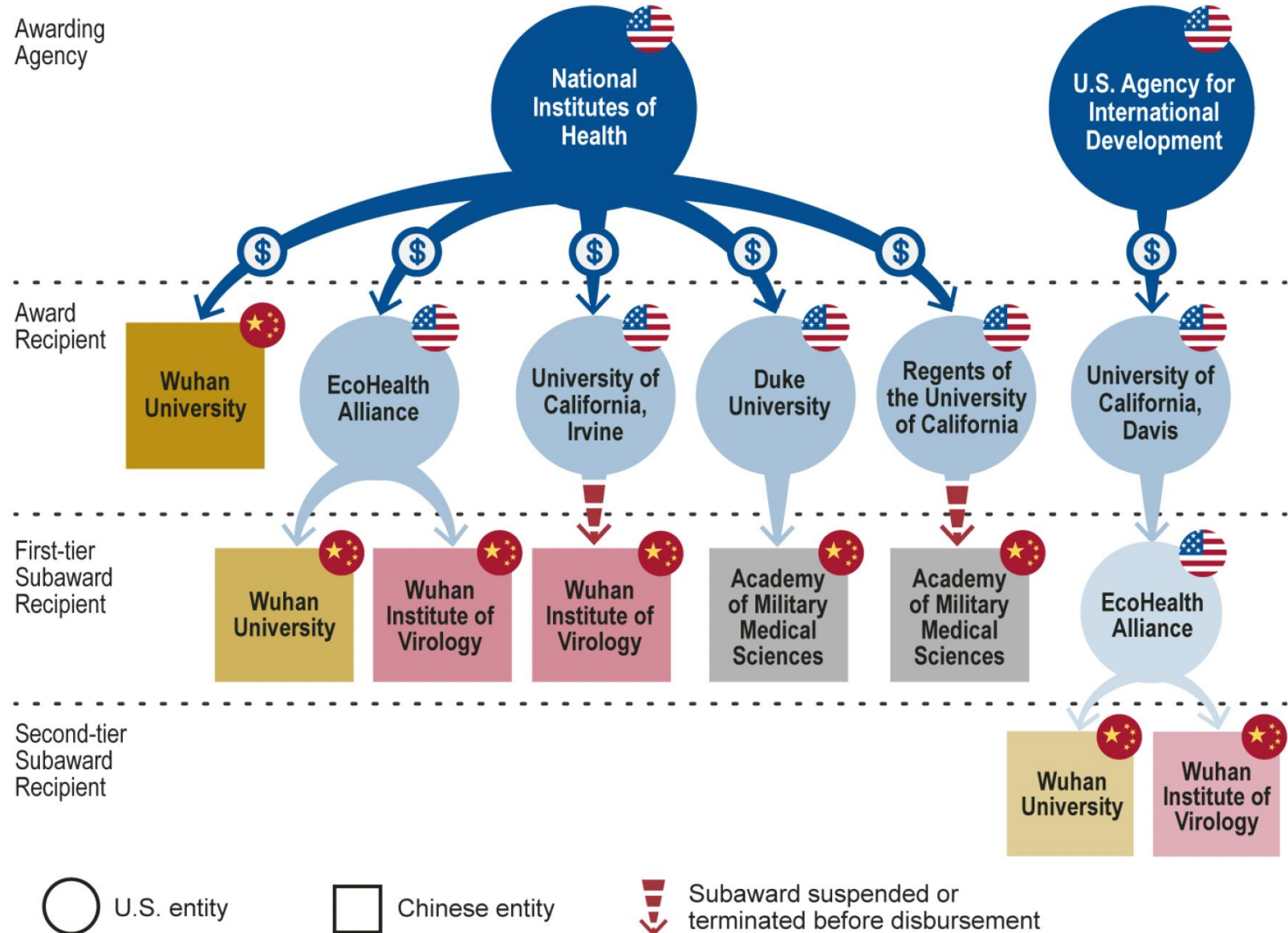
GAO-23-106119

Awards and Subawards Identified to Three Selected Chinese Entities, Calendar Years 2014-2021

Agency

“Prime”

Subrecipient



Terms & Conditions



OIG Commentary

“Although documentation indicates that WIV cooperated with EcoHealth’s monitoring for several years, WIV’s lack of cooperation with the international community following the COVID-19 outbreak—consistent with the response from China—limited EcoHealth’s ability to monitor its subrecipient, and greater transparency is needed ...”

OIG Recommendations

“Implement enhanced monitoring, documentation, and reporting requirements for recipients with foreign subrecipients.”

<https://oig.hhs.gov/oas/reports/region5/52100025.asp>

NIH Implementation

Effective January 1, 2024, international subrecipients under NIH funded awards must provide the prime award recipient (UCLA) with *“access to copies of all lab notebooks, all data, and all documentation that supports the research outcomes as described in the progress report.”*

Requirements



Subrecipient provides information to the UCLA PI at least annually

Usually prior to submission of the RPPR
Electronic access is acceptable



UCLA PI documents receipt, reviews and retains full access to the information

For three years after submission of UCLA's final financial report to NIH



NIH may request UCLA provide the information

At any time

Active Foreign Subawards



- OCGA informed the relevant contracting official of all active international NIH funded subrecipients of the new requirements
- OCGA is currently issuing subaward amendments incorporating the mandatory requirements
 - Amendments must be fully executed by March 1, 2024
- **PIs should:**
 - **Ensure their counterparts are aware of the requirement**
 - **Collaboratively, with their counterparts, establish a process, method of transmittal and timeline to meet the new requirement**

New Foreign Subawards: Proposal Stage

Requirements

- Principal Investigators must:
 - Inform Subrecipient of requirement
 - Obtain subrecipient's consent by submitting the UCLA [Letter of Intent](#)

NIH International Subrecipient Reporting Requirements *(For non-U.S. Subrecipients only.)*

- If the prime sponsor is the U.S. National Institutes of Health (NIH), Subrecipient is aware of the provisions of [NIH GPS 15.2.1](#) requiring that international subrecipients provide access to copies of all lab notebooks, data, and documentation that support any resulting research outcomes, and Subrecipient confirms that it is able to comply and provide UCLA with regular access to these materials (i.e. annually) for the life of the subaward.

New Foreign Subawards: Award Stage



PI notice included in the updated OCGA Subaward Checklist



New Terminology in the subaward

Per NIH GPS 15.2.1, [subrecipient] must provide [UC campus] with access (which may be electronic) to copies of all lab notebooks, all data, and all documentation associated with the research as described in [subrecipient's] progress reports to [UC campus]. This access must be provided at least once a year and at [UC campus's] request. By signing this agreement, your organization certifies that it will comply with this requirement.



Automatic notifications will be sent to the UCLA PI upon full execution of the initial subaward and annually thereafter reminding them of the responsibility to collect, review and maintain the required information



Disclosures

**Bio-Sketch, Other Support and
Current & Pending Reports**

Disclosure Requirements



Prior to sending Other Support / Current & Pending reports to OCGA:

- Review and verify reports for completeness, reasonableness and accuracy
- If you have access, compare against the NIH or NSF reports available on the ORA portal

Common Disclosure Errors



- Listing past awards as current
- Listing received awards as pending
- Including prior period effort data
- Not including current and future effort data
- No overlap statement when there is over 12 months committed effort

Biographic Sketch Reminders



Include all academic, professional or institutional appointments and positions

- Whether or not, remuneration is received
- Full-time, part-time, and voluntary
- Current domestic or foreign professional appointments outside of UCLA

Current & Pending or Other Support Reports Reminders



Include all:

- Projects currently under consideration **from any source**, including the current project
- Ongoing projects from any source
 - Funding awarded through UCLA, another organization, and directly to the individual
 - Monetary and non-monetary support (e.g., even if the support received are in-kind contributions such as office/laboratory space, equipment, supplies, or employees)
- Current or pending participation in, or applications to, programs sponsored by foreign governments, instrumentalities, or entities
 - Including foreign government sponsored talent recruitment programs



Potential Government Shutdown

January 20th

Active Federal Awards



- Can continue as long as there is no:
 - Specific agency approval required by the terms of award to proceed with a project task, or
 - Notice from the awarding agency that specifically orders a work stoppage.
- Notify OCGA immediately If you receive a stop-work notice.
 - Expenses incurred during a Stop Work period are NOT reimbursable, even when the government resumes normal operations, until a written notice to resume work is received.

Federal Proposals



- Each agency will provide guidance on the status of proposal systems and whether submission deadlines will be revised
 - Proposals will likely not be processed by agencies until normal operations resume
- Watch for announcements from agencies for extensions of deadline dates
- Grants.gov Contact Center may remain available. However, it's unclear if all Help Desks systems will remain functional.
- The UCLA S2S Grants (Cayuse) system will remain available for proposal preparation and submission

Other Notes



- PIs should continue to meet all deadlines set forth in their awards and should be able to submit annual and final project reports and Project Outcomes Reports via Research.gov.
- Peer reviews/study sections are not expected to meet
- Federal personnel will not be available.
- For federally funded work that requires access to federal facilities or federal staff affected by a shutdown, the PI should evaluate whether there are portions of the work that can continue.
 - If the work cannot continue without access to federal facilities/staff, or a stop work notice is issued, the department should determine if persons working under the agreement can be redirected to other work and/or fund sources.
- Faculty working at a federal agency on an IPA agreement should immediately contact the agency to determine next steps.

OCGA Monthly Training

Budgets 101

Wednesday, January 17, 2024

9:30 – 11:00 AM

Virtual – Zoom Meeting

This session will cover basic extramural budgeting concepts, including the Federal Cost Principles, distinguishing between direct and indirect costs, and calculating indirect costs.

Thank You

[UCLA Office of Contract and Grant Administration | UCLA Office of Contract and Grant Administration \(OCGA\)](#)

