January 2024 Research Administration Forum Q&A

Contents

Human Research Protection Program

Q1: Just to confirm the submission deadlines: if an industry-sponsored study that would previously have been reviewed by MIRB2 is submitted after January 16th and before January 25th, would that submission be returned to the study team with directions to proceed with reliance on a commercial IRB?

A1: The varying meeting submission deadlines for each of the medical IRBs will impact how each committee will handle the transition.

The implementation date was set to fall after the submission deadline for the 1st February meeting for each of the MIRBs. The first February meeting for each MIRB will be the last meeting at which affected submissions are guaranteed to be reviewed by a UCLA MIRB. Because MIRB2 meets earlier in the month- the cut off is a week earlier, however, we can consider honoring the January 25th date for MIRB2 new and affected studies submitted BEFORE January 25th.

Our intent is to be as supportive as possible to study teams during this change in process.

January 25th is the date we will begin to redirect affected studies to a commercial IRB submission for all medical UCLA IRBs.

Q2: If the sponsor of a trial that would be affected (industry-sponsored, multi-site, etc.) is not using a commercial IRB, will the UCLA IRB still review the study?

A2: At this time, UCLA will not review. The rationale for the proposed FDA-rule change, as well as the revised DHHS Common Rule (45 CFR 46) is to facilitate the conduct of clinical trials and minimize administrative burden and duplication of efforts. The UCLA Human Research Policy Board (HRPB) recommendation to defer review of industry-sponsored, multi-site studies is to place the responsibility for the simplification of the regulatory oversight of the clinical trial on the Sponsor. The affected studies are often those where UCLA IRBs will have limited input, so it makes sense to defer to sIRB. The UCLA Letter to Sponsors is being revised to note this change and will be posted by the implementation date.

Q3: Are there templates or FAQ information on using DocuSign as a tool for consent forms?

A3: Guidance for remote consent is included in a guidance memo developed by the Office of Clinical Research and posted on ResearchGo and under the section, Documenting Informed Consent, pages 6-9, of the IRB guidance on Informed Consent.

Contract and Grant Administration

Q1: Does this new NIH requirement also apply to International SERVICE CONTRACTS (not Subawards)?

A1: From NIH NOT-OD-23-182: “The following highlights several areas within the consortium relationship that the recipient needs to address with consortium organizations receiving subawards...Note that most of these requirements only apply to a recipient's consortium relationships with sub-recipients. When the relationship is with a vendor that is providing routine goods and services within normal business operations that are ancillary to the operation of the research program, the public policy requirements listed below do not apply. The vendor must also be providing similar goods and services to many different purchasers and provide them in a competitive environment."

Q2: Does the foreign subaward require to send a letter of support (LOS) within the application agreeing to the conditions?

A2: This is still under discussion. We will communicate once a decision is made.

Q3: Can OCGA provide template language/emails that have been sent to the foreign subs regarding this new NIH requirement, that they can provide the departments to use to follow up with the PIs with foreign subs?

A3: This is an extract of the email that went to PI's and fund managers:

NIH recently issued new procedural requirements for international subrecipients. Effective January 1, 2024, NIH is requiring that international subrecipients under NIH funded awards 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." International subrecipients must provide this information to the UCLA PI at least once per year, usually prior to submission of the RPPR. NIH has confirmed that electronic access is acceptable, however we are required to have full access to the information listed above for three years after submission of UCLA's final financial report to NIH. Additionally, as part of its oversight responsibilities, NIH may request UCLA to provide some or all of the information.

Over the course of the next few weeks OCGA will begin contacting active international NIH funded subrecipients to inform the relevant contracting official of this new requirement and to issue a subaward amendment incorporating these mandatory requirements. We also encourage you to discuss this with your international subrecipient counterparts to ensure they are aware of the new requirements and to work together to establish a process to meet the new requirement.

Principal Investigators are responsible for documenting receipt of, and ensuring access to, the information listed above and retaining it for three years after submission of UCLA's final financial report to NIH.

Additional NIH resources and FAQs are available here.

Q4: Is there any way to remove submitted-but-not funded proposals from the ORA Portal database (the NIH Other Support tool)?

A4: Please send an email (including the **lead** PI) to myocgadata@research.ucla.edu confirming the 'not funded' status of the project and we can update the PATS record - which is where the NIH tool pulls its info from.

Q5a: UCLA letter of intent is updated with the new language of the new requirement, but on the proposal, is the foreign sub PI required to send a LOS agreeing to the terms and conditions? Since the LOI is generally signed by the business office, at application stage PI is aware of this requirement and included in the submitted proposal.

A5a: This is still under discussion. We will communicate once a decision is made.

Q5b: To put this from the perspective of a reviewer: When we see a proposal with a foreign subaward, do we need any written document within the proposal (ie. letter of support)? Or is the signed letter of intent that is included in the submitted proposal to NIH sufficient?

A5b: At this time a signed LOI will work. As noted above we will communicate when a final decision is made.

Q6: For foreign subawardees, are there any guidelines for the non-physical sciences? Often, there is very little in terms of "lab notebooks" or new data, and it's more of a shared collaboration analyzing existing data. Should we just consider email communication to be the data that they provide? Or should we collect something that attests that there is nothing additional to share?

A6: If NIH is funding a scope of work, including work to a foreign sub then there should be something from the sub to support the results or outcome of the work reported in the RPPR. The support documentation will be dependent upon the scope of work being funded.

Q7: Is it okay to include on C&P that award that expired by date but has an ongoing NCTE approval that has not been entered or updated in the system?

A7: If OCGA is the approver it should be in the system already. If it's a second request or it's related to an incoming subaward it is reasonable to include that comment on the C&P.

Q8: Can we have a similar Table as presented by Rebecca on when Reviewing Committee is reviewing imminent Awards; nowadays it looks that OCGA is taking much longer than before to issue a new award. sometimes, months.

A8: OCGA turnaround times are reviewed and remain consistent. However, at individual awards, may be delayed because of outstanding paperwork or compliance approvals. If you are not aware of any of those issues, contact your OCGA POC.

Q9: What is the definition of "any source"? Department funding, gift funding, FTE, practice plan.... Does "any source" mean specific projects that were applied for? What about directorships, vice chair, chiefs?

A9: Here is the link to the federal definitions. It does not include UCLA start-up funds provided to the PI or gift funds as long as there is no associated time commitment.

Q10: This isn't really a question, but just something that I found helpful, and it isn't in the standard NIH Other Support guidance (it's only in the FAQs): if a project crosses over calendar years, the budget period listed should be the year that the budget period ENDS. So even if it is a Feb 2024-Jan 2025 budget period, the year should be 2025 for that period.

A10: Please see NIH FAQ # 25: "The New Other support format page includes a chart that asks for the Year (YYYY). Is that calendar year or fiscal year: It is calendar year (e.g., the grant budget period). If PD/PI's are reporting person-months that span two calendar years, they should enter the latter year. For example, if the budget period runs from June 2019 through May 2020, the PD/PI should enter "2020" for the year and include the corresponding person months."

Q11: For the current and pending support, to report the effort by year, is the year when the budget period starts, when the budget period ends, or the year when the PI plans to take summer ninth? Also, is the effort to be reported the effort level awarded or the effort PI plans to take which could be different?

A11: Effort in OS and C&P should be the effort the PI plans to expend on the project in the current and future years. It is actual effort, not budgeted effort or effort for which salary is requested. So, if I plan to charge 1 month salary to a project but work 2 person months on it, I report 2 months in the C&P.

Ascend 2.0

Q1: How can fund managers and PIs view subaward/subcontract invoices if they are sent to a centralized email address (noreply@invoices.ucla.edu)?

A1: After the invoice is sent to the centralized email address, it will enter BruinBuy *Plus* workflow. Fund managers and PIs will automatically receive a notification when an invoice tied to a fund for which they are an approver requires their approval.

Q2: If the vendor submits their invoices directly to me, can I submit them to noreply@invoices.ucla.edu myself, or does the vendor need to submit them themselves?

A2: You can submit the subaward invoice directly to noreply@invoices.ucla.edu. There is no need to go back to the vendor.

Q3: According to information on the BruinBuy *Plus* Hub, invoices must be submitted by vendors directly to the centralized email address. Are subaward invoices managed differently?

A3: No - all invoices need to be submitted to noreply@invoices.ucla.edu email address to enter BruinBuy *Plus* workflow.

Q4: Do PIs and fund managers get notifications that an approval of a subaward/subcontract invoice is required?

A4: Yes, they get a notification when there is an invoice pending their approval.

Q5: What happens if a fund manager for a certain PI changes?

A5: You can let us know via the Help Desk at help@it.ucla.edu. Alternatively, when an amendment takes place against that sub, you can indicate the fund manager change while filling out the amendment in BruinBuy *Plus*.

Q6: Can you please confirm where to upload invoices?

A6: Please send invoices to noreply@invoices.ucla.edu.

Q7: Moving forward, do subaward invoices still require PI signatures?

A7: PIs are still required to review and approve the subaward invoices; however, the approval will take place in the system, BruinBuy *Plus*. Putting a signature on the invoice copy is no longer needed as the PI's approval will be tracked in the system.

Q8: Is what the PI sees in BruinBuy *Plus* when approving invoices the same view that a fund manager sees? I want to show a PI where to complete this approval.

A8: Yes, PIs and fund managers see the same thing in the system.

Q9: What is the turnaround time from when invoices are submitted to when they need be approved in BruinBuy *Plus* by the fund manager and PI?

A9: Right now, since the system is so new, we are unable to project or indicate turnaround times.

Q10: Is there a way to find PANs that need to be reviewed? Does the system generate a notification when a PAN is read?

A10: There are no notifications and there is no automatic way to know if you have reviewed a PAN. You will review the reporting dashboard, and then filter by Requisitions, POs, or invoices to review the transactions you need to review. Additional information can be found in the [PAN Reviewer Quick Reference Guide].

Q11: Does the new invoice submission process apply to existing (old BruinBuy) subaward POs or only new subaward POs?

A11: The new invoice submission process (sending the invoice to noreply@invoices.ucla.edu) is the only way that any invoice can be received.

Q12: We used to submit a subaward amendment for each year to release funds to the subawards. Will we need to request a new PO for the amendments in BruinBuy *Plus*?

A12: No, you can create a change request against the original PO. Navigate to the Research Subcontract/Subaward form and under the questions "New Subaward or Subcontract Amendment," select "amendment."

Q13: A subaward invoice was sent to the invoice submission email and we can see it in BruinBuy *Plus*, but no approval email was generated. How do we approve if nobody has received an email?

A13: There was a glitch with the workflow for invoices against subs. As of week of 1/15/24, invoices will now prompt notification emails. If invoices were received prior to week of 1/15/24, AP may reach out for manual approval.

Q14: If a migrated PO is still open, how will it be closed if a new PO will be created for that transaction?

A14: All migrated POs were automatically closed in legacy BruinBuy and the encumbrances released. If you are seeing a migrated PO not closed in legacy BruinBuy, email the PO number to the Help Desk.

Q15: After a subaward invoice is submitted to the appropriate email address, I assume the fund manager and PI receive an email to log in and review/approve, is that correct? Can we get a screenshot or example of what that looks like? There is nothing on the Hub. How is Receiving handled? Is it incorporated into the fund manager invoice approval process, or is it a separate action that must be taken after approvals are received? If the latter, is there an email/notification that goes out to the fund manager to inform them that Receiving can now be done? It would be great if we could see a how-to or guide for this process.

A15: A notification is sent via email, to the PI and fund manager. The eLearning courses show what the notification looks like. For a screenshot, send a ticket to the Help Desk and we can supply that image for you. The Receiving step is separate from approval. See [receiving instructions in a QRG] or [receiving instructions in a video].

Q16: Can you please clarify if Receiving for subaward should be done before invoice submission? It seems that way based on the training, but doing Receiving first means the service has been received/approved.

A16: Receiving, by definition, means you are receiving an amount against the PO for services rendered and that amount can be paid by AP towards an invoice. It should be done prior to the invoice approval.

Q17: Do Admins have access to BruinBuy *Plus*? I have completed the Campus Buyer training and am able to log in, but I can't find any of our existing subaward POs or invoices in the system when I search for them. These are POs that should have been migrated.

A17: A known issue has been identified: not everyone can view migrated P, G, S POs because they are "owned by purchasing." The team is working to find a workaround.

Q18: Should receiving for a subaward be done before invoice submission?

A18: You will not be able to do Receiving until the invoice has been sent to the centralized email address, noreply@invoices.ucla.edu, and it's matched in BruinBuy *Plus*.

Q19: Our department discovered that migrated encumbrances no longer include sales tax in the "Encumbrance" column of the ledgers. This has negative downstream impacts for our C&G funds since it gives departments a false sense that there are more funds available in our FAU. We brought this up to BFS and they said that the encumbrance of sales tax will "be implemented in Release 2 of Oracle Cloud". However, they indicated that they don't have a timeline. Is this something that EFM can help us follow up on? This is extremely concerning and would require fund managers to manually calculate sales taxes to be included in their internal projection reports.

A19: That is correct. With R2, that will be brought back in. R1 cannot support the sales tax, technically, in the encumbrance.

Q20: I have a subaward PO that was incorrectly set up by Purchasing. Before the transition to BruinBuy *Plus*, I submitted a POCR to fix this, which hasn't been done yet. Based on the new policy, it sounds like I instead need to request a new subaward PO. What is the new procedure for this?

A20: You will need to click onto the Research Subaward form in BruinBuy *Plus* to create this new PO.

Q21: Do you have any tips for getting assistance from the BruinBuy *Plus* team? Specifically, I'm looking for assistance reviewing PANS. I've taken the training, gone to the BruinBuy *Plus* Hub to look for resources, and created a ticket, but haven't been able to obtain answers to my questions.

A21: Please reach out to the Help Desk at help@it.ucla.edu.

Q22: Since we need to create new POs for amendments (new budget period), do we still select "amendment" and reference the new PO BruinBuy *Plus* provides? Should we include the previous PO in the comments? What is the procedure for the checklist form?

A22: Yes, a new BruinBuy *Plus* PO number will be generated. Then, to make any changes to that PO, you will simply pull up that PO in BruinBuy *Plus*, navigate to the top and click on "Change Requests," and then click on the "+" button. That will start the change request process against that PO number. See the Change Requests and PO Modifications guide on this process.

Q23: I have submitted several invoices on POs that should have been migrated, but when I go into the system, I can't find the invoices or any of our existing subaward POs when I search for them, nor have I received an email notification. This is time sensitive because we are closing Awards this month. Who is the best contact for this issue? I have contacted help@it.ucla.edu but have not heard back.

A23: If you are looking for migrated POs, this may be due to the fact that the PO Owner was a Purchasing Buyer, and not under your name. We are working on updating this and should have it done week of 1/22/24. You can reach out to the [Help Desk]() and indicate the migrate POs you are unable to view, and we can update that for you.

Q24: If we are only requesting to extend the subaward project period and not add additional funds, do we still need to create a new PO in BruinBuy *Plus*?

A24: Yes, our understanding is that a new PO will need to be requested.

Q25: How long does it take for the notification to be sent to fund managers/PIs after the invoice is sent to the centralized email address? I have sent invoices to the centralized email address but have yet to receive any notification.

A25: It takes some time, given we just went live, for invoices to get processed by AP. Also, please note, you will not receive a notification to approve any invoices until that invoice is actually in the PI/fund manager approval workflow step. There could be other workflow steps prior, needing approval, before it gets to a PI/fund manager for approval.

Q26: If we submit an amendment PO, what happens if the subaward has not reached the $25K F&A? If did, does the new PO show the correct object code?

A26: You will need to communicate this in the requisition and cross reference the original PO. If the original did not hit the $25K, then you will need to create a new PO in BruinBuy *Plus*. The first line should carry the balance of the first $25K, with the 7310 object code, then any additional lines should carry any extra funding, using the object code 7300.

Q27: For changes to migrated POs, do we need to submit a new subaward checklist too, or just create a new PO?

A27: If it was attached to the legacy PO, they can pull it up in legacy BruinBuy.

Q28: Regarding the creation of a new PO in BruinBuy *Plus* for amendments to existing subawards, does that require going through the whole forms procedure in BruinBuy *Plus* to create a new PO? It was mentioned in the trainings, but they did not go into greater detail about the process, except in the full day-long Campus Buyers class, so do we need to ask our Campus Buyers to do that process? Or can we request a new PO from Purchasing by submitting the amendment paperwork to OCGA?

A28: All transactions need to be processed in BruinBuy *Plus*. That is how the PI/fund manager gets assigned to the invoice approval process and how you get the PO number. PO numbers need to be requested from BruinBuy *Plus* - OCGA cannot submit requests for PO.

Q29: Do we need to close out the subaward PO created in BruinBuy and create a new PO through BruinBuy *Plus*?

A29: If a PO is migrated to BruinBuy *Plus*, that PO was closed out in legacy BruinBuy - there is nothing for you to do in legacy BruinBuy. You can find the migrated PO in BruinBuy *Plus*, and invoices can be processed against it.

Q30: Rather than assigning a specific fund manager to approve a subaward invoice, can a general shared email address that a department uses be listed in the system?

A30: No, a specific fund manager must be assigned, because that is uniquely tied to an individual's login and DACSS profile.

Q31: Where should I reach out for PAN-related questions?

A31: Please direct your questions to the Help Desk at help@it.ucla.edu.

Q32: We are not able to backdate for period of performance and project period when creating a subcontract. How do we proceed with subcontracts with a 1/1 start date?

A32: On the calendar, select today's date. In the line details or in the internal notes section, type the full period of performance.

Q33: Can you provide a sample timeline of subaward invoice processing? I submitted an invoice to the noreply@ address on Tuesday, but haven't received any notifications yet.

A33: It takes some time, given we just went live, for invoices to get processed by AP. Also, please note, you will not receive a notification to approve any invoices until that invoice is actually in the PI/fund manager approval workflow step. There could be other workflow steps prior, requiring approval, before it gets to a PI/fund manager for approval.

Q34: Is there some sort of training on how to complete (and cancel) Receiving for invoices?

A34: Please refer to this resource on Receiving.

Q35: Do subawards now need a new PO for each budget year? If yes, that would be unfortunate, since it adds an unnecessary administrative complication vs. having a single PO for the entire sub.

A35: No, they do not. Once a PO is created in BruinBuy *Plus*, you just need to amend it, and can add lines to it. To create a change order, pull up the BruinBuy *Plus* PO number, navigate to the "Change Request" tab, and click on the "+" sign. That will start the change request process against that PO. Additional information can be found in the Change Requests and PO Modifications guide.

Q36: If a PI is unsure about what to do if a notification was sent to him/her, can a fund manager help by directing the PI where to go in BruinBuy *Plus*?

A36: Yes. They can also reference training material found on the BruinBuy *Plus* Hub

Q37: How do we upload subaward invoices?

A37: Invoices must be emailed to noreply@invoices.ucla.edu.

Q38: We have an IARPA grant which we created a requisition for a subaward, and a subaward PO was issued via the legacy BruinBuy. The subaward PO was not migrated. We were asked to create a new PO. We are not sure why the subaward PO was not migrated. During the transition, the subaward agreement was submitted to the subaward with the PO # via the legacy BruinBuy system. The downside is that we will need to resubmit an amendment or change to the subaward agreement to the new PO #. Is it possible to submit a case and have the legacy BruinBuy subaward PO be migrated to BruinBuy *Plus*?

A38: What was this PO number? It may have been migrated and you just are unable to view it. See the [list of migrated subs](#).

Q39: Should the subject line or the body of the email have reference to the Subaward?

A39: If this question is referring to the invoice submission process to noreply@invoices.ucla.edu, no, the subject line is not read by digital capture.

Q40: There are a lot of BruinBuy *Plus* activities that affect C&G funding, and many of us are unable to get questions answered via procurement, Ascend 2.0, or BruinBuy *Plus* teams. Marcia and/or Yoon, can you please advocate to have them work on some sort of open house sooner than later for subawards, PANS, expense encumbrances, etc. that affect our PI's C&G funds?

A40: We will communicate the need for these types of events and keep the Research community informed of relevant dates, times, and details.

Q41: O.T. Wells is listed as the owner of our subaward PO. Is he receiving our approval emails for invoices?

A41: Yes, he is. Can you please reach out to the Help Desk to indicate the migrated POs that need to be switched to you? If you are looking for migrated POs, this may be due to the fact that the PO Owner was a Purchasing Buyer, and not under your name.

Q42: When I search in the system for POs on our subawards, I am unable to find them. Nothing populates when I search the PO. These are POs that should have been migrated, but now seem not to exist.

A42: If you are looking for migrated POs, this may be due to the fact that the PO Owner was a Purchasing Buyer, and not under your name. We are working on updating this and should have it done week of 1/22/24. You can reach out to the Help Desk and indicate the migrated POs you are unable to view and we can update that for you.

Q43: Can we submit multiple invoices in one email to the centralized email address?

A43: Yes, as long as each invoice is a unique PDF within that email.

Q44: I have not received any notifications to review submitted orders. I know our Purchasing team has already submitted several orders in the new BruinBuy *Plus*.

A44: There are no notifications for reviewers to review orders. You will review the reporting dashboard, and then filter by Requisitions, POs, or invoices to review the transactions you need to review. Additional information can be found in the PAN Reviewer Quick Reference Guide.

For subawards, notifications will be sent once the PI/fund manager workflow step is triggered. A notification will not be sent prior.

Q45: The training guidance available to us at this point in time is insufficient. We all have so many questions and it is very hard to get answers. A lot of us are creating our own groups to find answers. Can we request more help/guidance/training from BruinBuy *Plus* leadership?

A45: Please come to our Office Hours or reach out requesting Procurement to host a Q&A session with your specific group. Everyone, including central Procurement, is enduring all the changes with learning the new tool.

Q46: Is there a set of instructions we can send to PIs that show them how to do the approval process?

A46: They should have taken the PI training - you can refer them to the eLearning on the [BruinBuy *Plus* Hub].

Q47: Will EFM continue to allow to bill for subaward invoices that have not posted to the ledger? I am anticipating that there will be a backlog due to the transition to BruinBuy *Plus*.

A47: EFM will continue to follow the current business process for outstanding subaward invoices that have not been processed and posted to the General Ledger as expenses. Please include such subaward expenses in the Closeout Packet as an adjustment so it is included in the final expenses. As long as a copy of the subaward invoice is included that EFM can review to verify that service period is applicable to the project period and to confirm the amount, EFM will include subaward expenses in the final to submit to the sponsor so we can recover costs in full.

Q48: For subaward continuation/modification in BruinBuy *Plus*, do we need to close the migrated PO even though there are still balances left, and then include the carryover balance in the new PO?

A48: Migrated POs were closed out in legacy BruinBuy, and the encumbrances were released. The balance migrated over to BruinBuy *Plus*, which reflects that encumbrance now.

Q49: We are in need of more immediate help. The assistance available is either not clear or unresponsive altogether. Would be grateful for further guidance.

A49: The BruinBuy *Plus* team would be happy to hold a Q&A session with your group, if desired. You can email the Help Desk at help@it.ucla.edu - let them know Genelle Vinci referred you and indicate proposed dates.