

# **UC Policy: Requirement to Submit Proposals and to Receive Awards for Grants & Contracts through the University**

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Research Policy and Compliance

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# Policy Summary

- *All* employees of the University of California are expected to submit proposals for extramural support through campus contracts and grants office.
- Policy applies to *all* employees who receive any part of their salary through the University, or whose activities use any University resources or facilities.

# Policy Summary (continued)

- Policy is referenced in Academic Personnel Policies – APM 025 (Conflict of Commitment and Outside Activities of Faculty Members) and APM 671 (Conflict of Commitment and Outside Activities of Health Sciences Compensation Plan Participants). Prior approval required as a “Category I” activity – those likely to create conflict of commitment issues.
- APM 025 and 671 apply to faculty appointed at 50% or more.

# Authority to Grant Exceptions

- Authority to grant exceptions at UCLA is delegated to the Vice Chancellor for Research, Roger M. Wakimoto, under Delegation of Authority 258.03.
- Exceptions can be granted in unusual circumstances on a case-by-case basis.
- In most instances approval to serve as PI of a research grant or contract outside the University requires a reduction in UC effort.

# Considerations

- Only allowed under unusual circumstances
- Clear distinction between service to the University and service to the external organization submitting the proposal required
- Must ensure that all relevant personnel policies are followed
- No UC liability for activities
- No UC resources used (without appropriate contractual arrangements and compensation)
- All potential conflict of commitment and conflict of interest issues must be resolved

# Procedures

- UC Policy indicates that each campus should establish local procedures
- Informal process in place
- Review requirements and process at UCLA not widely known or formally promulgated
- Working with Academic Personnel to coordinate reviews for faculty covered by APM 025 and 671
- Beginning discussions about formal guidance/procedure

# Current Review and Approval Process

- Faculty covered by APM 025 and 671 can make requests via prior approval processes. Academic Personnel Office will coordinate review with the Office of the Vice Chancellor for Research.
- All other requests for prior approval should be submitted in writing to Vice Chancellor for Research, Roger Wakimoto but can be directed to Ann Pollack, Assistant Vice Chancellor – Research.

# Other Issues

- Most requests made in conjunction with federal SBIR/STTR programs (Universities not eligible to apply).
- Federal SBIR eligibility requirements require that the PI work at least 51% time for the applicant company and cannot remain at UCLA for more than 49% time.
- Because of effort considerations and conflict of commitment/interest concerns, most requests for approval require a reduction in UC effort for the duration of contract or grant.
- Requests from postdocs typically considered only when the postdoctoral appointment is nearing conclusion. Graduate Division approval to become a part-time postdoc is required.
- Exceptions cannot be made for individuals on H1-B visas because changes in work conditions are not permitted.



# References

- [UC Operating Memo 95-01 – “Requirement to Submit Proposals and to Receive Awards for Grants & Contracts through the University”](#)
- [UCLA Delegation of Authority 258.03](#)
- [APM 025 – “Conflict of Commitment and Outside Activities of Faculty Members”](#)
- [APM 671 – “Conflict of Commitment and Outside Activities of Health Sciences Compensation Plan Participants”](#)
- [Conflict of Interest Issues Related to Participation in SBIR and STTR Programs – FAQ](#)

# Questions

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