

# Compliance at the Proposal Stage: Prepare Now to Avoid Headaches Later

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# Our Presenters

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# Presentation Overview

- This session will provide a basic overview of how compliance is a key factor in submitting a proposal
- This session will cover the **Who, What, When, Why** and **How** compliance is a key part at the proposal stage
- We will discuss the steps that we can take to not only ensure that a proposal submission is successful, but to make sure that pre-award and award acceptance run efficiently

# Compliance - What is it?

- The act of conforming to a rule, specification, policy, standard or law
- UCLA makes an effort to certify that we are abiding by federal/regional regulations, government legislation, prescribed rules and regulations, specified standards, or the terms of a contract
- Series of directives United States federal agencies established that summarize hundreds of laws and regulations applicable to federal assistance

# Compliance - What is it?

- Certification of a proposal:
  - That the information submitted within the application is true, complete and accurate to the best of their knowledge
  - That any false, fictitious or fraudulent statements or claims may subject the Investigator(s) to criminal, civil or administrative penalties
  - Agree to accept responsibility for the scientific conduct of the project and to provide the required progress reports if a grant/contract is awarded as a result of the application
  - Not currently debarred, suspended or ineligible to receive federal or non-federal funds

# Compliance – When is it done?

U. of Washington:



<https://www.washington.edu/research/wp/wp-content/uploads/2017/04/MyResearch-Project-Lifecycle-01.24.17.jpg>

# Compliance – Who is responsible?

- Principal Investigator/PI
- Department Chair/Director
- Dean
- OCGA - Authorized Official
- Other Offices
  - OHRPP
  - RSAWA
  - RPC

# Compliance – Who is responsible?

- Principal Investigator/PI
  - Responsible for ensuring the preparation, conduct, and administration of the project is in accordance to sponsor and institutional policies and federal law and regulations
  - When multiple investigators are named, each investigator is responsible and accountable for the project
  - Certification is required by the Principal Investigator prior to submission



# Compliance – How do we comply?

- PI Eligibility
- Sponsor Guidelines
- Budget
- Subawards
- COI
- Human/Animal Subjects
- Biosafety
- Export Control
- Tools: EPASS and Sponsor Checklists

# Compliance – How do we comply?

- PI Eligibility
  - Policy driven, outlining different categories of employees that are authorized to serve as PI on extramurally funded projects
  - Per **UCLA Policy 900**: Eligibility to act as a PI with primary responsibility for the scientific, technical, and fiscal direction of the project resting with that individual; may be contingent upon continuation of employment or other status under which eligibility was initially determined; and compliance with all applicable policies of the University and the funding agency
    - <http://www.adminpolicies.ucla.edu/pdf/900.pdf>

# Compliance – How do we comply?

- PI Eligibility
  - What is required if individual does not fall under the policy but want to serve as PI?
    - Request for PI Exception:
      - Submitted through a form or letter and is signed by a delegated authority
      - Acknowledge space and facilities are available for the PI
      - Supports that the proposal meets the best interest of the University
      - **Approval for individual to serve as PI on a per project basis should accompany each proposal**
      - Policy 900 lists officials with authority to approve exceptions

# Compliance – How do we comply?

- Sponsor Guidelines
  - General sponsor proposal requirements
    - Specific instructions for formatting and required attachments, which forms to use, etc.
    - NIH: SF424 (R&R) Application guide
    - NSF: Proposal & Award Policies & Procedures Guide (PAPPG)
  - Specific program announcements/solicitations
    - May provide additional instructions supplanting general sponsor requirements

# Compliance – How do we comply?

- Tools: Sponsor Checklists
  - Sometimes included by sponsors to ensure that all required components are present
  - NSF:

**Project Description:**

- The Project Description must not exceed the 15-page limitation, the limit specified in a specific program solicitation, or the limit provided in the instructions for types of proposals (e.g., RAPID, EAGER and Ideas Lab).
- Project Description contains, as a separate section within the narrative, a section labeled "Broader Impacts".
- Project Description is self-contained, and Uniform Resource Locators (URLs) have not been included.
- Results from Prior NSF Support have been provided for PIs and co-PIs who have received NSF support with a start date in the past five years. Results related to Intellectual Merit and Broader Impacts are described under two separate, distinct headings, and are limited to five pages of the Project Description.

# Compliance – How do we comply?

- Tools: Sponsor Checklists

- NASA:

NSPIRES cover pages: Table 1 lists the few aspects that most commonly cause difficulties to proposers. There are many required parts to the cover pages, see the NSPIRES instructions.

Team	All investigators must indicate participation via NSPIRES, except proposals submitted via grants.gov. If any team member doesn't confirm their participation the AOR will get an error that prevents submission.
Team	Paid team members may not be collaborators, they should be given a role permitted to receive funds, such as Co-I.
Team	A critical partner with a sustained, continuing role is a Co-I, not a collaborator, even if unpaid.
Project Summary	Project Summary (abstract) must be in the text box in the cover pages, not the main body of the proposal. It has a built in 4000-character limit
DMP	For most programs, the Data Management Plan (DMP) or explanation of why it is not needed must be provided in the 4000-character text boxes in the cover pages, unless otherwise stated in the program element. See <a href="#">Section II(c)</a> and the <a href="#">ROSES FAQ</a> for important information.
Budget	List all costs. Include all salary and indirect costs in the NSPIRES cover page budgets.

# Compliance – Why is it necessary?

- **Federal Policies**
- Proposal submission to Federal agencies are assurances of compliance
- Certifying to agencies that we have verified accuracy of statements in application and current compliance with Federal regulations

# Compliance – Why is it necessary?

- **Internal Compliance**
- Delay of proposal submission
  - Missing signatures
  - Missing COI forms
  - Missing/incomplete proposal forms
  - Revisions to proposal documents
    - Can be time-consuming
- Front line of protection
  - Identify compliance risks and take action before they become compliance violations



# Compliance – Why is it necessary?

- **Consequences**

- Proposal rejection
- Delays in award acceptance and set up
- Negative impact of PI and/or institution's reputation and professional standing
- Suspension of the project indefinitely or until corrective actions are in place.
- Termination of award
- Repayment of funds/ Re-budgeting
- Audit issues and/or disallowances.
- Debarment/suspension
- Violations of federal regulations and University policies (civil, criminal disciplinary, and administrative penalties)
- Fines, criminal charges and/or other penalties

# Any Questions?



# Master Training session

Wednesday, January 17, 2018

9:30am – 11:00am

UCLA Wilshire Glendon

Conference Room 820-20

10899 Wilshire Blvd.

Los Angeles, CA 90095

RSVP: <http://ora.research.ucla.edu/OCGA/Pages/Training-Resources/training-calendar.aspx>