Welcome and Reminders

• This is NOT being recorded

• We will answer questions at the end of each segment as time permits

• Submit questions via Zoom Q&A window

• Use the “raise hand” option to ask a question verbally. You will be allowed to unmute.

• Slides will be posted on ORA website following the meeting
Agenda

• Welcome & Announcements – Marcia Smith

• Extramural Fund Management – Yoon Lee
  ◦ Appropriation for Award Payment Bases
  ◦ Invoicing and Reporting for Awards Received in Foreign Currency
  ◦ Effort Reports

• Foreign Engagement: Disclosures to UCLA and Research Sponsors – Ann Pollack and Marcia Smith

• Q&A – Open Forum
Agenda

• ORA Procedures
  ◦ Appropriation for Award Payment Bases
  ◦ Invoicing and Reporting for Awards Received in Foreign Currency

• Effort Reports
  ◦ Current Release Certification Status
  ◦ Next Release Plan
All RAF presentations are available at https://ora.research.ucla.edu/raf/

“Question and Answer” is posted in addition to the presentation.
ORA Procedure:
Appropriations for Award Payment Bases
Invoicing and Reporting for Awards Received in Foreign Currency

Yoon Lee
ORA Procedures

- **ORA procedures effective 2/01/21:**
  1. Appropriations for Award Payment Bases
  2. Invoicing and Reporting for Awards Received in Foreign Currency

- Procedures were vetted amongst the 3 offices involved in processes: OCGA, ORDM, and EFM.

- Procedures can be found on the EFM website under “Policies and Procedures” section. [https://efm.research.ucla.edu/policies-and-procedures/](https://efm.research.ucla.edu/policies-and-procedures/)
Purpose of Procedure

• To describe how appropriations are processed to the general ledger (GL) based on the payment bases for sponsored research awards. The payment basis determines how UCLA will earn and record revenue. The three payment bases are Cost Reimbursement, Firm Fixed-Price, and Firm Fixed-Rate.

Definitions

• **Cost-Reimbursement**: Payment is based on actual costs incurred. Revenue is earned when allowable and applicable costs are incurred up to the total approved budget. Unspent cash balance must be returned to the sponsor.

• **Firm Fixed Price**: Payment is based on a fixed specified amount, regardless of costs incurred. Revenue is earned as milestones are completed. Unspent cash balance can be retained by the University in accordance with UCLA Policy 913.

• **Firm Fixed Rate**: Payment is based on a fixed rate applied to the number of units performed up to the total approved budget. An example is a clinical trial where funding is based on the number of patients participating in the trial and payment is received incrementally up to the maximum amount indicated in the award. Unspent cash balance can be retained by the University in accordance with UCLA Policy 913.
Appropriations for Award Payment Bases

OCGA (Office of Contract and Grant Administration)

1. At the time of award execution, OCGA completes the internal form, Award Data Coding Sheet (ADCS), and indicates the payment basis and budget amount for the award. Awards with multiple payment bases will have the budget for each payment basis on the ADCS.

ORDM (Office of Research Data Management)

1. ORDM posts the appropriation to GL for the awarded amount indicated in the ADCS.

2. If the budget is cost reimbursement or firm fixed price, the appropriation is posted to GL for the awarded amount.

3. If the budget is firm fixed rate, the quantity of the units to be completed for the project is unknown at the time of award execution. Although the sponsors provide an awarded amount “not to exceed”, it is not uncommon to complete a far less number of units than what was projected in the maximum amount. As appropriating the maximum amount can be misleading as available budget to spend, the appropriation will not be posted to GL.

4. If the budget has multiple payment bases, a separate expense account and cost center will be designated for each payment basis and the appropriation to each expense account and cost center will follow the steps above.
EFM (Extramural Fund Management)

1. When the financial deliverable is due, EFM prepares it, working with the department as needed, based on the appropriation in GL to submit it to the sponsor except for industry sponsored clinical trials.

2. For Industry Sponsored Clinical Trials, departments invoice the sponsor and EFM will appropriate budget to GL as payments are received.

3. EFM de-obligates unused appropriation balance in GL when submitting the final financial deliverables based on what UCLA has earned (revenue).

4. For cost reimbursement awards, EFM will return unspent cash balances to the sponsor.

5. For fixed rate or fixed price awards, EFM will transfer unspent cash balances per PI’s request in accordance with UCLA’s Policy 913.
**Purpose of Procedure:** To standardize invoicing and financial reporting for awards received in foreign currency.

**OCGA and ORDM**

- Before execution of an agreement, OCGA intends to negotiate the award in US dollars.
- If the sponsor requires foreign currency, then OCGA converts the awarded amount to US Dollars and ORDM appropriates the budget to GL.
- A note is added in the award snapshot, *Section II: Special Attention Needed*, that serves as a notification to the administering department that awarded amount is subject to change depending on foreign currency conversion rate.
- The foreign currency conversion rate information is included in the “*Actions*” section on the second page of the award snapshot.
Example of award snapshot

Section I: Award Summary

Principal Investigator:
Sponsor:
Administering Unit:
Project Title:
Current Budget Period:
Project Period:

Current Action:
Funds Awarded this Action:
Total Funds Awarded to Date:

See Section VII for Other Investigators.
For a History of Actions on this award, refer to the Award Snapshot Attachment.

Section II: Special Attention Needed

1. This award is paid in foreign currency. The actual amount of funds received over time from the sponsor may differ from the awarded amount due to fluctuating exchange rates. The departmental fund manager should monitor exchange rates and review payments received to project the true fund balance available for spending.
2. Review the Award Snapshot Attachment and the Award document for additional terms and conditions.

Action(s)

1. Sponsor award agreement dated and signed 6/21/16 provides funding in the amount of 116,000 € EURS for the period of 07/01/16 through 06/30/18. The estimated dollar amount of $132,240 is based on the conversation rate of 1 EUR = 1.14 USD on May 12, 2016. Please review your General Ledger receivables for converted payment amount. Date of payment receipt will determine the conversion rate used.

2. Allocating Year 2’s funds of $66,120 for the project period of 07/01/2017 to 06/30/2018. The estimated dollar amount of $66,120 is based on the conversation rate of 1 EUR = 1.14 USD on May 12, 2018. Please review your General Ledger receivables for converted payment amount. Date of payment receipt will determine the conversion rate used.

3. Sponsor modification dated 07/01/18 provides funding in the amount of 57,000 € EURS for the period of 07/01/18 through 06/30/2019. The estimated dollar amount of $66,388 is based on the conversation rate of 1 EUR = 1.16 USD on June 26, 2018. Please review your General Ledger receivables for converted payment amount. Date of payment receipt will determine the conversion rate used. Sponsor modification also extends the end date to 06/30/2019.
Invoicing and Reporting for Awards Received in Foreign Currency

**EFM (existing procedure)**

1. When the sponsor requires invoicing or reporting in the sponsor’s currency, EFM converts the total costs in the UCLA dollar in GL to a foreign currency applying the conversion rate at the time invoice or report is prepared.
   - EFM uses foreign currency conversion rates published on Bank of America, UCLA’s major bank: [https://www.bankofamerica.com/foreign-exchange/foreign-currency-exchange/](https://www.bankofamerica.com/foreign-exchange/foreign-currency-exchange/)
   - EFM includes the conversion rate information as supporting documentation to the invoice or financial report.

2. EFM records revenue and accounts receivable (A/R) in US dollars in GL based on the invoice amount issued to sponsor.

3. Payment the sponsor sends in a foreign currency is converted into US dollars when it is deposited to UCLA’s bank. The payment received in US Dollars may be less or more due to different conversion rates at the time of invoicing and receipt of the payment and a wire fee for EFT.
   - EFM adjusts revenue and AR amounts based on the actual payment value deposited in US dollar to UCLA’s account.
   - At the fund closeout, the department will receive either the gain or need to cover for the loss of payment as a result of currency conversion and the wire fee.
4. EFM evaluates the award amount every 6 months from the award begin. If a significant change to the exchange rate results in the anticipate total award amount to be greater or lesser than the total awarded amount on the award snapshot by 25%, EFM will adjust the appropriation in GL accordingly to reflect the current fair value of the amount in the US dollar to spend.

- Semi-annual financial deliverables are added in PAMS (category = Internal Financial Reports) to trigger evaluation of the award amount. Comments to this financial deliverable will say “Foreign Currency 6-month review”.
- EFM documents the assessment in the comments section of the PAMS deliverable.
- EFM emails the PI and Department Fund Manager about the appropriation adjustments made in GL.
- The award amount in the award snapshot will remain same.
Effort Report Certification

Yoon Lee
Effort Report Status

- Effort Report Certification Progress as of March 11, 2021 (released on September 24th)

<table>
<thead>
<tr>
<th>Reporting Period</th>
<th>Summer 2018</th>
<th>Fall 2018 (Modified)</th>
<th>Winter 2019</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Certified</td>
<td>348</td>
<td>4,696</td>
<td>4,032</td>
<td>9,076</td>
</tr>
<tr>
<td>Open</td>
<td>86</td>
<td>1,363</td>
<td>1,098</td>
<td>2,547</td>
</tr>
<tr>
<td>Total</td>
<td>434</td>
<td>6,059</td>
<td>5,130</td>
<td>11,623</td>
</tr>
<tr>
<td>Certification rate</td>
<td>80.18%</td>
<td>77.50%</td>
<td>78.60%</td>
<td>78.09%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>As of 2/11/21</th>
<th>Increase (decrease)</th>
</tr>
</thead>
<tbody>
<tr>
<td>8,754</td>
<td>322</td>
</tr>
<tr>
<td>2,869</td>
<td>(322)</td>
</tr>
<tr>
<td>11,623</td>
<td>0</td>
</tr>
<tr>
<td>75.32%</td>
<td>2.77%</td>
</tr>
</tbody>
</table>

- Reports flagged as “Under Prelim Review” in ERS due to unresolved UCPath defects.

<table>
<thead>
<tr>
<th>Issue description</th>
<th>Affected reports</th>
</tr>
</thead>
<tbody>
<tr>
<td>Incorrect effort percent for effort bearing payroll line</td>
<td>269</td>
</tr>
<tr>
<td>Pending mass leave correction</td>
<td>518</td>
</tr>
<tr>
<td>Missing payroll records</td>
<td>386</td>
</tr>
<tr>
<td>Missing Y-OTC or N-OTC lines</td>
<td>231</td>
</tr>
<tr>
<td>Total effort reports with errors</td>
<td>1,404</td>
</tr>
<tr>
<td>Total number of effort reports</td>
<td>11,623</td>
</tr>
</tbody>
</table>

Adjust and certify!

1,135: Pending resolutions for certification.

- Thank you for the progress!

https://portal.research.ucla.edu/EffortReportingCertification

- Status Reports

<table>
<thead>
<tr>
<th>Status</th>
<th>Reports</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of effort reports</td>
<td>11,623</td>
</tr>
<tr>
<td>Total pending UCPath resolution</td>
<td>- 1,135</td>
</tr>
<tr>
<td>Total ready for certification</td>
<td>10,488</td>
</tr>
<tr>
<td>Total certified</td>
<td>- 9,076</td>
</tr>
<tr>
<td>Remaining for certification</td>
<td>1,412</td>
</tr>
</tbody>
</table>
EFM plans to generate effort reports soon in April/May 2021 to bring it all up to current.

More details on the release date and certification due dates will be shared soon.

In the meantime, certify effort reports currently released as soon as possible.

- Be prepared for single audit for FY20-21.
- Certification of next effort reports will coincide with fiscal closing period.
- Catch up with the current open effort reports now!

**Effort Report: Next Release**

<table>
<thead>
<tr>
<th>Reporting Period</th>
<th>Non-Academic and 11/12 Academics</th>
<th>9/12 Academics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Summer 2019</td>
<td>July – September 2019</td>
<td>June – September (*)</td>
</tr>
<tr>
<td>Fall 2019</td>
<td>October – December 2019</td>
<td>July – October 2019</td>
</tr>
<tr>
<td>Summer 2020</td>
<td>July – September 2020</td>
<td>June – September (*)</td>
</tr>
<tr>
<td>Fall 2020</td>
<td>October – December 2020</td>
<td>July – October 2020</td>
</tr>
<tr>
<td>Winter 2021</td>
<td>January – March 2021</td>
<td>November 2020 – February 2021</td>
</tr>
</tbody>
</table>

(*) Additional Compensation DOS codes only
Any Questions?

Contact Information

EFM Website
https://efm.research.ucla.edu

ERS Help Desk
Email: ershelp@research.ucla.edu

Yoon Lee
Phone: X40375
Email: yoon.lee@research.ucla.edu
Foreign Engagement: Disclosures to UCLA and Research Sponsors

Ann Pollack, Associate Vice Chancellor - Research
Marcia Smith, Associate Vice Chancellor for Research Administration

March 11, 2021
Purpose and Goals of Briefing

- To provide information to help faculty comply with UC, UCLA, and federal grant policies in areas related to foreign engagement.

- Issues:
  - Increased sponsor concerns, requirements and scrutiny.
  - UCLA and PI responsibilities.
  - Guidance for faculty.
UCLA Research and Foreign Engagement

- Foreign engagement is of fundamental importance to UCLA.
- Affiliations with foreign institutions, collaborative research, and scholarly exchanges are an essential part of the academic community.
- UCLA is committed to continuing and strengthening these relationships.
- We must recognize and address the U.S. government’s increased focus on foreign involvement in university research.
Key Concerns

- U.S. research institutions are sometimes unaware of individual faculty member’s and other researcher’s foreign engagements.

- In submitting proposals for research support, investigators sometimes fail to disclose:
  - Foreign resources to be used in the project.
  - Foreign employment arrangements and affiliations.
  - Foreign research funding: overlap, duplication, over-commitment.
  - Foreign financial interests.
Response to Concerns by Federal Research Sponsors

- Since 2018, U.S. government agencies have publicly expressed concerns that foreign entities may be using their financial support and interactions with the academic community to compromise U.S. economic competitiveness and national security.

- To address these concerns, new policies and regulations have been issued by federal research sponsors. Existing policies and regulations are being clarified and enforced more actively.

- Disclosure of foreign involvement by individual investigators in applications for research support is an area of special focus.
Sponsor Requirements

- Certain collaborations and/or affiliations with foreign entities or individuals must be disclosed in proposals and reports. Such collaborations may include exchanges of staff, materials, data, funding, or other significant activity which could be considered a "foreign component" or could result in joint authorship.

- Failure to fully disclose foreign/domestic collaborations, affiliations and resources in funding applications and other documents can have serious consequences for the individuals and the university.
In August 20, 2018, Dr. Francis Collins, NIH Director, issued a letter reminding the research community of the requirement to disclose "all forms of other support and financial interests, including support coming from foreign governments or other foreign entities" in funding applications and progress reports.

NIH investigated ~ 399 scientists at 189 institutions (June 2020).

NIH confirmed violations of agency policies by >150 investigators at 87 institutions (July 8, 2020 blog posting by Michael Lauer, M.D.)
National Science Foundation (NSF)

- On July 11, 2019, NSF Director, Dr. France Cordova issued a Dear Colleagues Letter commenting on an increase in "the scope and sophistication of the activities threatening our research community" and outlining NSF’s plans to address this situation, including a renewed effort "to ensure that existing requirements to disclose current and pending support information are known, understood, and followed."

- NSF has taken action in 16–20 cases in which foreign ties were not properly reported (Nature, July 2020).

- NSF Semi-Annual Reports to Congress in 2019 and 2020 include reports of 5 cases.
On March 20, 2019, DOD issued a memo that outlined disclosure requirements for Key Personnel on research and research-related educational activities supported by DOD grants and contracts.
DOE issued DOE Order 486.1 (June 7, 2019) requiring DOE contractors to exercise *due diligence to ensure that none of its employees or subcontractors "participate in a foreign government talent recruitment program of a foreign country of risk while performing work within the scope of the DOE contract."* It is expected that this requirement will apply to DOE grants and cooperative agreements in the near future.
Foreign Talent Programs: What are they?

- An effort directly or indirectly organized, managed, or funded by a foreign government to recruit science and technology professionals or students (regardless of citizenship or national origin, full-time and part-time).
- Often secret – not principled collaborations.
- Engage investigators under contract and provide:
  - Significant salary.
  - Appointment at a foreign university.
  - Funded “shadow” lab in foreign country.
  - Access to high tech equipment.
Principled Research

As defined by the federal Office of Science and Technology Policy, the values and principles that guide Principled Research include:

- Openness and Transparency
- Accountability and Honesty
- Impartiality and Objectivity
- Respect
- Freedom of Inquiry to allow individual curiosity to guide discovery
- Reciprocity to ensure that scientists and institutions exchange materials, knowledge, data, access to facilities and training that benefits collaborating partners proportionately
- Merit-based competition
Foreign Talent Programs: What are the concerns?

- Commitment to keep the terms of the agreement confidential.
- Promise not to disclose the results of work conducted under foreign patronage.
- Investigator cannot terminate the agreement without permission of the sponsoring government.
- Promise to turn over intellectual property that they develop (in U.S. or in a foreign country).
- Promise to provide appointments in the U.S. lab to foreign collaborators or visitors.
National Aeronautics and Space Administration (NASA)

- C3. By submission of its proposal, the proposer represents that the proposer is not China or a company owned by the People’s Republic of China, and that the proposer will not participate, collaborate, or coordinate bilaterally with China or any Chinese-owned company, at the prime recipient level or at any sub-recipient level, whether the bilateral involvement is funded or performed under a no-exchange of funds arrangement.

- NOTE: Use of NASA funds to support Chinese national students or visiting scholars is not expressly forbidden, but the restriction is focused on the existence of the individual’s affiliation with the government of China or a Chinese-owned company.
Federal Bureau of Investigation (FBI)

- The FBI and U.S. Department of Justice released a white paper in April 2011 on “Higher Education and National Security: The Targeting of Sensitive, Proprietary, and Classified Information on Campuses of Higher Education” to alert universities “about how foreign intelligence services and non-state actors use US colleges and universities to further their intelligence and operational needs.”
- In the fall of 2017, Director Christopher Wray established the Foreign Influence Task Force (FITF) to identify and counteract malign foreign influence.
- In March 2018, the FBI issued a document titled “China: the Risk to Academia.” This document outlines ways for universities to protect themselves from counterintelligence threats.
- On August 30, 2018, the FBI launched a webpage to combat foreign influence.
“None of the Moffitt faculty who were Talents program participants properly or timely disclosed their Talents program involvement to Moffitt, and none disclosed the full extent of their Talents program activities prior to Moffitt’s internal investigation, Moffitt officials wrote on 17 January to state Representative Chris Sprowls (R), who leads a special legislative committee created this month.”
MIT Professor Arrested and Charged with Grant Fraud

BOSTON – A professor and researcher at Massachusetts Institute of Technology (MIT) was charged and arrested today in connection with ... 3 weeks ago

MIT professor charged with hiding work for China

BOSTON (AP) — A Massachusetts Institute of Technology professor was charged Thursday with hiding work he did for the Chinese government ... 3 weeks ago
Performance of a significant scientific element of the NIH-supported project outside of the United States, whether or not grant funds are expended, requires NIH prior approval.

- Collaborations with investigators at a foreign site anticipated to result in co-authorship.
- Use of facilities or instrumentation at a foreign site.
- Receipt of financial support or resources from a foreign entity.
Other Agency Policies on Foreign Components

**DOD** may fund collaborations with foreign institutions under certain conditions. Prior approval is required.

**DOE** EERE and ARPA-E do not allow any part of funded research to be performed outside the U.S. without a waiver.

**NASA** does not normally fund research proposals from, or subawards to, foreign organizations, nor research efforts by individuals at foreign organizations as part of U.S. research proposals. Requires prior approval.

**NSF** rarely provides direct funding support to foreign organizations. See NSF Policy and Procedure, [Chapter 1, Paragraph E.6](#). Requires justification and prior approval.
NIH Other Support

Disclose in proposals, just-in-time requests, progress reports, and as requested includes all resources made available to researchers in support of and/or related to all of their research endeavors, regardless of where those resources are located.

Includes, but is not limited to:

- Research support at UCLA and at other institutions, foreign or domestic.
- Financial support for laboratory personnel.
- Access to specialized equipment or facilities at any location.
- Access to materials that are not freely available.
- In-kind support.

Does not include start-up funds from U.S. institutions.

NIH Other Support FAQs
### NIH Matrix – What to Disclose and Where

#### Examples of What to Disclose to NIH about Senior/Key Personnel on Applications and Awards:

**Table 1: Recipients Must Report**

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>All positions and affiliations, including volunteer positions, relevant to the application</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>✓ If personal payments to the individual</td>
</tr>
<tr>
<td>Relevant appointments at foreign institutions – even if labeled as “guest,” “adjunct,” “honorary,” with or without salary support</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The number of person-months devoted to projects, even if there is no salary support or direct personal payments to the scientist</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>✓ If new</td>
<td></td>
</tr>
<tr>
<td>Income, salary, consulting fees, and honoraria in support of an individual’s research endeavors</td>
<td>✓</td>
<td></td>
<td></td>
<td>✓</td>
<td>✓ If new</td>
<td></td>
</tr>
<tr>
<td>Participation in a foreign talent or similar-type programs</td>
<td>✓</td>
<td></td>
<td></td>
<td>✓</td>
<td>✓ If new</td>
<td></td>
</tr>
<tr>
<td>Ongoing and completed research projects from the past three years that the applicant wishes to highlight</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**NIH Protecting U.S. Biomedical Intellectual Innovation**
NSF Current and Pending Support

All resources made available to an individual in support of, or related to, all of his/her research efforts, regardless of whether or not they have monetary value, and regardless of whether or not support is provided through the proposing organization, another organization, or directly to the individual:

- Includes support for the proposed project, ongoing projects, and pending proposals.
- Includes in-kind contributions (such as office/laboratory space, equipment, supplies, employees, students) that are intended for use on the proposed project and that also have an associated time commitment.
- Includes federal, state, local, foreign, public or private foundations, non-profit organizations, industrial or other commercial organizations or internal funds allocated toward specific projects.

NSF Current and Pending Support FAQs
NSF Post-Award Disclosure of Current Support

NSF Research Terms and Conditions (Effective 10/5/2020)

Article 38. Post-award Disclosure of Current Support and In-Kind Contributions

- If an organization discovers that a PI or co-PI on an active NSF award failed to disclose current support or in-kind contribution information in the proposal, the Authorized Organizational Representative (AOR) must submit the information within 30 calendar days of the identification of the undisclosed current support or in-kind contribution.

NSF Updates to RPPR (Effective 10/5/2020)

- Has there been a change in the active other support of the PI/PD(s) since the last reporting period?

- What percentage of the award’s budget was spent in a foreign country?

- Has there been a change in primary performance site location from that originally proposed?
NIH and NSF Biosketches

- List all positions and affiliations including volunteer positions:
  - NIH instruction to list appointments that are “relevant” to the proposal is being changed. List all appointments and affiliations.
  - Include all appointments at foreign institutions – even if labeled as “guest,” “adjunct,” “honorary” – with or without salary support.
  - Include participation in a foreign talent or similar-type program.
SciENcv: Science Experts Network CV

Benefits per SciENcv

• “Eliminates the need to repeatedly enter biosketch information.”

• “Reduces the administrative burden associated with federal grant submission and reporting requirements.”

• “Provides access to a researcher-claimed data repository with information on expertise, employment, education, and professional accomplishments.”

• “Allows researchers to describe their scientific contributions in their own language.”

SciENcv: Science Experts Network Curriculum Vitae
SciENcv YouTube Videos

**NSF Biographical Sketch**

SciENcv for NSF Users: Biographical Sketches

**NSF Current and Pending Support**

SciENcv for NSF Users: Current and Pending Support
DOD Current and Pending Support

**DOD Memorandum** – “Actions for the Protection of Intellectual Property, Controlled Information, Key Personnel and Critical Technologies” (March 2019)

Requires disclosure of current and pending support in all applications for grants, cooperative agreements, technology investment agreements, and other non-procurement transactions that support research and research-related educational activities.

“This information will be used to support protection of intellectual property, controlled information, key personnel, and information about critical technologies relevant to national security. Additionally, this information will be used to limit undue influence, including foreign talent programs, by countries that desire to exploit United States' technology within the DOD research, science and technology, and innovation enterprise.”
DOE Current and Pending Support

DOE Order 142.3A, Unclassified Foreign Visits and Assignments Program

- Order modified in December 2019 to remove the “fundamental research exception” for universities.
- Current grant terms include controls on unclassified foreign national access to “DOE sites, information, technologies, and equipment.”
- ‘Foreign national’ is defined as any person who is not a U.S. citizen by birth or naturalization.
- Foreign national participation may require DOE prior approval.

Current and Pending Support

- List all current and pending support for the PD/PIs and senior/key persons, including sub-awardees.
- List all sponsored activities or awards requiring a measurable commitment of effort, whether paid or unpaid.
NASA PIs and Co-PIs must list all ongoing and pending projects and proposals in which they are performing or will perform any part of the work.

Disclosure must include the name of the sponsoring organization, including a point of contact with telephone number and email address.

DOD, DOE and NASA have all been directed by the GAO to document procedures, roles, and responsibilities for addressing and enforcing failures to disclose required information, both foreign and domestic.
Changes in Status of PI Require Prior Approval

- Sponsors require advance notification and prior approval of a change in status of the PI. Change in PI status may be:
  - Significant reduction in the PI’s effort commitment.
  - Sabbatical, leave of absence, or administrative leave.
  - Other circumstances that result in absence from the project for 90 days or more.

- Request for sponsor prior approval must include a plan for the ongoing management of the project during the absence, such as temporary appointment of an alternate PI.

- Sponsor prior approval is required for a PI or other project team member to work from a remote location outside of the U.S. (‘foreign component’).
Federal Expectations and Our Challenges

- Federal research sponsors hold institutions responsible for the accuracy and completeness of all proposals, progress reports, and other documentation submitted.

- How can UCLA know the full range of faculty outside activities including membership in foreign talent programs, appointments elsewhere, access to facilities and resources elsewhere, and any other sources of research support?

- How can UCLA ensure that proposals, Just-In-Time documents, and progress reports sent to OCGA for submission to sponsors are accurate and complete?
What has UCLA already done?

- Distributed communications from campus leadership in November 2018 and February 2019.
- Convened a series of Foreign Engagement meetings with vice chancellors, deans and key administrators.
- Organized a campus visit and town hall meetings with Michael Lauer, M.D., deputy director for NIH Extramural Research.
- Created a dedicated “Foreign Engagement” website to provide guidance to the UCLA community.
- Developed a PI Portfolio Report in the UCLA PI Portal to assist in reporting accurate data for grants/contracts processed by OCGA, TDG and DGSOM Clinical Trials office (does not include gifts, awards made to other institutions).
UCLA Policy 910: Management of Sponsored Projects

RESPONSIBILITY FOR COMPLIANCE

- Primary responsibility rests with the principal investigator, and PI’s signature on EPASS is a certification that submitted information is complete and accurate.

- Deans, department chairs and ORU directors provide primary oversight and are responsible for management of sponsored projects in their respective units.

- The ORA Authorized Official’s signature on a proposal, current and pending support page, progress report, or correspondence is a certification and assurance that the documents are complete and accurate.
Deans and Chairs: Sources of information about possible foreign engagement

- Requests for prior approval under Academic Personnel policies on outside activities (APM 025 and 671) start at the department level and are endorsed by deans.
- Leave requests are initiated at the departmental level and endorsed by deans.
- Sabbatical requests are initiated at the department level and approved by deans.
- Development of academic dossiers resides within the schools.
- Departmental support for proposal development and management of awards is overseen by chairs.
- We need your help.

Mike Lauer’s “Open Mike”
"Addressing Foreign Interference and Associated Risks to the Integrity of Biomedical Research, How You Can Help"
Questions?
Q1: Do all UCPath defects need to be resolved before Policy 913 funds can be released to the department? Or can they be addressed with a journal entry?

A1: It depends on which UCPath issue it may be related to. Please contact your EFM accountant. Or feel free to contact your EFM manager or me (yoon.lee@research.ucla.edu) as well.

Q2: We are having trouble with exception effort reports with negative percentages. The issue is we cannot locate the UCPath retro lines to match the GL/payroll lines to move. Can the helpdesk work with us?

A2: Certainly, please contact the ERS helpdesk: ershelp@research.ucla.edu. Val Gomez and Paula Dion in EFM monitor the ERS helpdesk on a daily basis. If you prefer to review cases via Zoom, they can also be reached at valeria.gomez@research.ucla.edu and paula.dion@research.ucla.edu respectively.

Q3: If I understood correctly, conversion will be completed based on the date EFM invoices. Does this mean EFM will be invoicing on a monthly basis to cut down on the liability to the faculty?

A3: EFM prepares invoices and financial reports for all awards including the awards received in foreign currency based on the terms required by the sponsor. Frequency of invoicing/reporting is determined by what is required by the sponsor. If the sponsor requires monthly, EFM submits the invoice/report monthly. If the sponsor requires quarterly, EFM submits the invoice/report quarterly.

Q4: We still have effort reports that have a check mark under prelim review. I'm not sure if they are ready to be certified or not. Are the UCPath defect issues resolved?

A4: Unfortunately, four issues described on the EFM presentation slide 14 are not resolved yet. However, the effort reports flagged “prelim review” and if the comment in the report describes the first issue on the slide, “Incorrect effort percent for effort bearing payroll line,” you can still certify after making adjustments based on the Excel supplementary schedule EFM provided. Effort reports flagged with “Prelim review” and comments describe any other three issues on the slide, these fall into 1,135 reports on the slide and are not ready for certification pending resolution of UCPath issues. You can find more detailed instruction on https://efm.research.ucla.edu/special-instructions-ers-release/. There is a recorded webinar for the instructions on how to certify effort reports flagged with “prelim review” as well.

Q5: We also have two effort reports that the effort is not reported correctly. I have submitted direct retro to make correction and it is posted to the ledger. However, the effort report didn't reflect the change. The effort report last modified date is still 09/21/2020 v1.0, so should we wait until the effort report reflected the changes before certifying?

A5: Please wait until DR gets reflected in the effort report. You will see DR updates when we load payroll data for the next release in April/May.