



Office of Contract and Grant Administration Miscellaneous Updates

August 12, 2021

Miscellaneous Updates

- PI/Key Personnel Leave of Absence
- Temporarily Teleworking from Overseas
- DoD Contracts & Subcontracts: New IT Security Requirements

PI/Key Personnel Leave of Absence

- Sponsors typically expect that PIs are engaged in conducting and overseeing research projects and personnel at UCLA facilities
- When PIs are away from these facilities or absent from a project for a period of time, the sponsor needs to know of and approve the absence and any plan to address it
- Generally, all federal sponsors require approval of at least an absence of three months

PI/Key Personnel Leave of Absence

- Non-federal sponsors do not typically call out a specific period of time, other than when a PI leaves UCLA; however, an absence of more than three months should be a basis of discussion with the sponsor, including a plan as to how the work will proceed during the absence
- For temporary absences where the PI wishes to continue to oversee the project (e.g. off campus sabbatical, FMLA, etc.), a request should be submitted to the sponsor, seeking approval for the PI to remain on the project despite the absence and describing how the PI will remain engaged in the project. Such requests must originate with the PI and be endorsed and submitted by OCGA as the Institute's Authorized Representative

If the PI wishes to continue to oversee the project, the following information should be provided:

- The nature of the leave
- If there will be any change in scope of the project due to the leave
- The location from which the PI/key personnel will perform the work (USA or abroad, if abroad what country)
- How the PI will continue to direct the work remotely (e.g., how will they communicate with and supervise those still at UCLA, including methods of communication and frequency)
- If human subjects or animals research is involved, how will that work be managed in the PIs physical absence
- Whether the level of effort the PI will spend on the project will be reduced
- How financial oversight will be managed

Regulatory and Sponsor Requirement

Uniform Guidance 2 CFR § 200.308

For non-construction Federal awards, recipients must request prior approvals from Federal awarding agencies for the following program or budget-related reasons... The disengagement from the project for more than three months, or a 25 percent reduction in time devoted to the project, by the approved project director or principal investigator.

NIH Grants Policy Statement

[Section 4 8.1.2.6](#) Change in Status, Including Absence of PD/PI and Other Senior/Key Personnel Named in the NoA

The recipient is required to submit a [prior approval](#) request to the GMO if:

- There is a significant change in the status of the PD/PI or other [Senior/Key Personnel](#) specifically named in the [NoA](#) including but not limited to
 - withdrawing from the project entirely,
 - being absent from the project during any continuous period of 3 months or more, or
 - reducing time devoted to the project by 25 percent or more from the level that was approved at the time of initial competing year award (for example, a proposed change from 40 percent effort to 30 percent or less effort or in calendar months a change from 4.8 to 3.6 calendar months)
- [NOT-OD-18-172](#)
- [NOT-OD-20-124](#)

NSF PAPPG

VII Grant administration

B. 2. a. Long-Term Disengagement of PI/PD or co-PI/co-PD

In the event the PI/PD or co-PI/co-PD will be disengaged from the project for a period greater than three months (e.g., sabbatical leave) but intends to return, arrangements for oversight of the project must be signed and submitted by the AOR via use of NSF's electronic systems.

This request must be submitted at least 30 days before departure or as soon as practicable after the prospective disengagement is known.

The cognizant NSF Program Officer will provide written approval to the grantee if the arrangements are satisfactory, but no formal amendment to the grant will be made.

If the arrangements are not satisfactory to NSF, the grant may be terminated.

Temporarily Teleworking from Overseas

- Need to inform sponsors and / or request prior approval if personnel working on contracts and grants are temporarily working abroad
- APO and Grad Office have implemented review processes that include OCGA if C&G are involved
- Sponsor approval should be obtained prior to commencement of overseas activities

Temporary Overseas Telework Exceptions

UCOP Academic Personnel and Programs

The following academic appointees are permitted to temporarily telework from overseas if they are, by exception, approved to do so by a central campus office and the appointee's supervisor/department head, and in accordance with their campus approval protocols and procedures.

1. Academic appointees (including student employees) who have a visa but are subject to a travel restriction and cannot enter the U.S.;
2. Newly appointed academic appointees (including student employees) who have been unable to obtain their visa to enter the U.S.; and
3. Current academic appointees (including student employees) who have been unable to renew their visa to enter the U.S.

DoD Contracts & Subcontracts: New IT Security Requirements

- DoD recently implemented additional IT security requirements and reporting to comply with the National Institute of Standards and Technology, NIST 800-171 in the protection of unclassified federal information in nonfederal systems and organizations
- Before any new DoD award, task order, modification or no cost extension can be issued, each project is required to develop a system security plan (SSP), perform a detailed self-assessment and create a plan of action (PoAM) to implement any missing controls

DoD Contracts & Subcontracts: New IT Security Requirements

- Initially we are only required to develop a plan and submit a score, but eventually (by 2025) all recipients of DoD contract funding must demonstrate that they have achieved an acceptable score
- David Shaw, UCLA's Chief Information Security Officer is working with consultants to support SSP development and self-assessments, and PoAMs for PIs with DoD contracts/ subcontracts
- A heads up has been sent to all PIs with active DoD contracts & subcontracts

Any Questions?
