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 orally. You will be allowed to unmute.
• Slides will be posted on the ORA website following the meeting
Agenda

• Welcome & Announcements – Marcia Smith

• Special Guest Researcher – Nina Harawa, Ph.D., M.P.H.

• Research Policy and Compliance Hot Topics
  ◦ Russia Sanctions – Ann Pham

• Contract and Grant Administration Hot Topics
  ◦ Subawards – Tracey Fraser and Kristin Lund
  ◦ COVID Certifications from Sponsors – Jim Fong and Flora O’Brien
  ◦ OS Report Refinements, 700U Certifications – Tracey Fraser

• Open Forum – Questions, Discussion – All
Presented by Nina T. Harawa, PhD, MPH
Professor of Medicine and Epidemiology

Who Am I?
Scholar, Educator, Epidemiologist, Mother, Patient
Black woman, both an immigrant and citizen by birth.
Director, Policy Core, UCLA Center for HIV Identification, Prevention, and Treatment Services (CHIPTS)
Carceral populations

Mass incarceration: 200,000 to 2.2 million

People Serving Life Exceeds Entire Prison Population of 1970

FEBRUARY 20, 2020

In this report, we present a closer look at the rise in life sentences amidst the overall expansion.
The UCLA Department of Medicine currently spearheads two research studies to **test the effectiveness of community-based interventions in improving health outcomes** among populations at-risk or currently living with HIV. A third observational study called **BARS**, involves one-time qualitative interviews.

This consortium of studies includes:
- **LINK2**
- **MEPS**
- **BARS**

Both **LINK2** and **MEPS** studies include **navigation principles and cash incentives to facilitate access to services upon release from jail or prison** in order to support, linkage, retention, stability, and harm reduction. **LINK2** also works with people who have other risk factors for poor engagement in care.

The findings from these studies seek to **build on current best practices using a collaborative approach** between the study team and direct service providers.
PI: Harawa (UCLA), Belzer (CHLA)
Collaboration between UCLA, CHLA, U Chicago and LAC DHS (Wolchok)
NIH-funded
08/08/2017 - 03/31/2023

GOALS:
• To adapt the LINK LA peer navigation intervention for adults to create a Youth Service Navigation (YSN) intervention to guide youth to needed services along the continuum of HIV care. This intervention combines medical, substance use and mental health care with comprehensive reentry support.

• To test the effectiveness of the new YSN intervention compared to standard of care services.

ELIGIBILITY CRITERIA (Community Recruits):
• Diagnosed HIV+
• Ages 16-25
• Not assigned female at birth
• English language fluency
• Has experienced any of the following:
  • criminal-justice involvement in prior 12 months,
  • parents ever incarcerated,
  • involvement in child protective services ever,
  • current housing instability,
  • current food insecurity, OR
  • recent use of illegal substances.
• Resident of Southern California or State of Illinois

Enrollment goal: 142
Length of follow-up: 12 months
Compensation: Up to $260

Contact: dahernandez@mednet.ucla.edu; 213-587-1525
WHY DOES THIS STUDY MATTER?

• HIV prevalence among incarcerated youth living with HIV (YLWH) is three times that of the general population.

• Less than half of YWH achieve HIV viral load suppression due to poor retention and adherence to anti-retroviral therapy (ART).

• Existing linkage and retention services are insufficient to meet the needs of criminal justice-involved (CJI) YLWH and those with other risk factors that may increase their risk of poor engagement in care.

GOALS: To test the effectiveness of the Mobile Enhanced Prevention Support (MEPS) intervention:
1. To improve engagement in PrEP
2. To encourage regular screening for HIV, STIs, and hepatitis C
3. To encourage linkage to and retention in treatment for substance use disorders
4. To reduce recidivism
MEPS

ELIGIBILITY CRITERIA

- HIV negative/unknown status
- 18-49 of age
- Transgender woman or cis-gender man
- Has sex with men
- Housed in LA County MCJ K6G unit OR living in the community less than 12 months post-release from incarceration
- Has sought help for substance use disorder
- Resident of LA County

Enrollment goal: 300
Length of follow-up: 9 months
Compensation: $260 and up

Contact: GVictorianne@mednet.ucla.edu; 424-501-4829

MEPS

WHY DOES THIS STUDY MATTER?

- Many people are contracting HIV even though we have the tools to prevent it.
- Minoritized populations (race, sexuality, gender), people with substance use disorders, and people who have been incarcerated are at greater risk for HIV and other STIs.
- Reentry is a particularly risky time for substance use-related harms.
- Prevention case management and patient navigation are often not available for people at risk for HIV.
The BARS Study: Building Agent Based Models of Racialized Justice System Study in Black MSM

BARS Study (NIDA funded)

- **FOCUS: OPIOID USE AMONGST RECENTLY INCARCERATED BLACK MSM**

- The **primary goal** of this qualitative interview protocol is to examine institutional and social network contributors to opioid use (including prescription opioids, heroin, and synthetic opioids such as fentanyl), opioid use disorder, and opioid-related harms among younger Black men who have sex with men (YBMSM) who have been involved with the criminal justice/corrections system.

- Our approach is informed by the **risk environment framework** and a **life course perspective**. The risk environment framework recommends targeting an environment which creates risk for drug misuse and abuse, and then working with a community as a whole rather than with individuals.
Project Initiatives

- Book drive for Men's Central Jail
- Health talks at residential recovery facilities, led by UCLA MD/PhD student
- Activism – L.A. Regional Reentry Program
- Development of community staff members
From Our Team to Yours:
THANK YOU!
**WHAT ARE EXPORT CONTROLS?**

The *federal laws and regulations* that have been established by the U.S. government to control:

- The **export** of sensitive equipment, software, and technology
- Trade and financial transactions

These controls are in place to promote national security interests and foreign policy objectives.

*export* the shipment, transmission, or transfer of items, information, and software to foreign countries, persons, or entities

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**IMPACT ON UCLA**

- Research
- Teaching
- Services
- Financial Transactions – payments, purchases
- Travel
- Shipment of tangible items
- Visa beneficiaries
- Violations and reputational risk
UPDATE Russia Sanctions & Export Controls

**U.S. DEPARTMENT OF COMMERCE**
Bureau of Industry and Security ("BIS")

- Severely restrict Russia’s access to technologies and items that sustain military capabilities
- Target Russia’s defense, aerospace, and maritime sectors
- Policy of denial on items that were not previously subject to controls: *semiconductors, computers, telecommunications, information security equipment, lasers, sensors*

**U.S. DEPARTMENT OF THE TREASURY**
Office of Foreign Assets Control ("OFAC")

- Target Russia’s two largest financial institutions and other major ones
- Require all U.S. financial institutions to close any correspondent or payable-through accounts and to reject any future transactions
- Russian and Belarus individuals sanctioned

**WHAT DOES THIS MEAN FOR UCLA?**

- Fundamental Research are not subject to export controls
- Deemed exports are excluded
- License may be required for:
  - Shipping and exchange of information
  - Travel
  - Services
  - Financial Transactions
QUESTIONS & COMMENTS

export.controls@research.ucla.edu

Ann Pham
Export Control Officer

Aaron Taber
Senior Export Control Analyst
OCGA’s Outgoing Subaward Team (OST)

Research Administration Forum

March 10, 2022
OCGA OST Metrics: Open Agreements

- # of Open Agreements: 334
- Ave Age: 40 Days
OCGA OST Metrics: Fully Executed Agreements

YTD Completed
1307

Ave. TAT
42 days

Ave. OCGA TAT
28 Days
OCGA OST Metrics: Fully Executed

New Subaward

- Ave Total Turnaround time: 66 days
- OCGA Turnaround Time: 33 days

Subaward mod

- Ave Total Turnaround time: 41 days
- OCGA Turnaround Time: 27 days
### OCGA OST Metrics: Fully Executed

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</tr>
<tr>
<td>Ave OCGA / TAT (Subaward mod)</td>
<td>26 days</td>
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</table>
Opportunities to Improve Turnaround Times

• Submit paperwork for subawards timely, ideally when the main agreement has been fully executed
• Don’t wait until after the subaward period of performance starts
• Submit complete paperwork package
  ◦ Kristin will discuss in more detail
OST: Updates

Kristin Lund, Assistant Director, kristin.lund@research.ucla.edu
Mary Haskins, Contract & Grant Officer, mhaskins@research.ucla.edu
Shawn Hoffman, Senior Contract & Grant Analyst, shawn.hoffman@research.ucla.edu
Kim Smith, Senior Contract & Grant Analyst, kimberly.smith@research.ucla.edu
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Ashley Severa, Contract & Grant Analyst, ashley.severa@research.ucla.edu
Jesus Reyes, Contract & Grant Analyst, jesus.reyes@research.ucla.edu
Jarelye Picado, Contract & Grant Specialist, jarelye.picado@research.ucla.edu
Communications:

OST Automated E-mails

- E-mail notifications to let you know when your subaward request has been assigned to an OST negotiator
OST: Updates (Cont.)

OST Information: FAQs update

- The Outgoing Subaward Team’s questions and answers on OCGA’s FAQs page are being updated
OST: Updates (Cont.)

Next steps:

◦ Forms review
  ◦ Streamlining of current OST required forms

◦ Additional training
  ◦ Video training on OST forms

◦ System changes
  ◦ Fully moving into OCGA’s PATS system
**OST: Standard Processes**

- Initially reviewed by OST's Intake
- OST Intake may request additional information or clarification

- OST Negotiator reviews Subaward Checklist and Backup Documentation along with the overall project documents

- If any additional information or clarification is needed, the OST Negotiator will contact the Department
OST Negotiator conducts review of the subaward entity to determine risk
Review of the entity is based on documents submitted by the Department and online profiles and information

OST Negotiator uses the entity review, the review of subaward documents and review of the overall UCLA project, to determine overall project risk
Negotiator begins to draft the Subaward Agreement, overall project risk assessment may necessitate additional subaward requirements
# OST: Department Review of Proposal Stage Documents

## Proposal Documents required for Subrecipients who ARE FDP Expanded Clearinghouse Members:

- Sub vs. Contractor Determination Checklist *(UCLA)*
- Letter of Intent *(Sub)*

**Plus**
- Subrecipient's Detailed SoW *(Sub)*
- Subrecipient's Detailed Line Item Budget-Just., (including Cost share Budget/Justification *if app*) *(Sub)*

## Proposal Documents required for Subrecipients who ARE NOT FDP Expanded Clearinghouse Members:

- Subrecipient vs. Contractor Determination Checklist *(UCLA)*
- Subrecipient Commitment Form *(Sub)*, and, if applicable:
  - U.S. Federal IDC/Fringe Rate agreement(s) *(Sub)*
  - PHS Financial Disclosure Form *(Sub)*
  - Fair and Reasonable Cost Analysis Form *(UCLA)*
  - Certificate of Compliance - Audit *(Sub)*
  - Financial Audit Management Questionnaire (FAMQ) *(formerly known as A-133 Mini Audit)* *(Sub)*
  - FFATA most highly compensated officers list *(Sub)*

**Plus**
- Subrecipient's Detailed Scope/Statement of Work (SoW) *(Sub)*
- Subrecipient's Detailed Line Item Budget-Justification, (including Cost share Budget/Justification *if applicable*) *(Sub)*

## Proposal Documents required for sister UC campuses:

- MCA Commitment or LOI *(Site)*

**Plus**
- Campus’ Detailed SoW *(Site)*
- Campus’ Detailed Line Item Budget-Justification, (including Cost share Budget/Just. *if app.*) *(Site)*
Proposal Stage Documents

- Please be sure to review forms that are received from your subrecipients
  - Review is necessary to ensure completeness

- Subrecipient Commitment Form items that are generally missed:
  - F&A Rate Agreement
  - Fair and Reasonable Cost Analysis
Proposal Stage Documents

▪ Subrecipient Commitment Form items that are generally missed (cont.):
  ◦ FAMQ

### Section C: Audit Status

1. Does the subrecipient receive an annual audit in accordance with OMB Circular A-133/Uniform Guidance? **YES** [ ] **NO** [ ]
   
   If **YES**,
   
   a) A complete copy of subrecipient’s most recent audit report, or the Internet URL link to a complete copy, must be furnished to UCLA OCGA before a subaward will be issued.
   
   b) Has the audit been completed for the most recent fiscal year? **YES** [ ] **NO** [ ]
   
   c) Were there any audit findings reported? **YES** [ ] **NO** [ ]

   If **YES**, UCLA requires that the entity complete the [Certificate of Compliance](#).

   If **NO**, UCLA requires that the entity complete a [Financial Audit Management Questionnaire](#) and may require a limited-scope audit before a subaward can be issued.
Subrecipient Commitment Form items that are generally missed (cont.):

- SAM Registration

6. Is subrecipient currently registered in System for Award Management (SAM)? (www.sam.gov)  YES □ NO □

If NO, organizations that have not registered with SAM will need to obtain a DUNS number first and then access the online registration through the SAM (System for Award Management) home page at https://www.sam.gov (U.S. organizations will also need to provide an Employer Identification Number from the Internal Revenue Service that may take an additional 2-5 weeks to become active). Completing and submitting the registration takes approximately one hour to complete and your SAM registration will take 3-5 business days to process. Subrecipient must have a current SAM registration and maintain their current information in SAM prior to issuance of a Subaward.
Submitting your Subaward Checklist package to the OST

- Please review your package beforehand
  - Make sure that everything requiring signature is signed
  - Make sure that all documents meant to be included are included
- No piecemeal submissions with multiple e-mails
- If your subrecipient will be working with human or animal subjects, the OST will need approvals for that work prior to finalizing the agreement
- REDUCE processing times by submitting complete Subaward Checklist packages to the Outgoing Subaward Team (OST) at ocgasubawards@research.ucla.edu.
OST: Submitting Your Subaward Request Package (cont.)

REDUCE processing times by submitting complete Subaward Checklist packages to the Outgoing Subaward Team (OST) at ocgasubawards@research.ucla.edu.

The current Subaward Checklist form (version dated 4/15/2021) with all items answered. This includes answering the Conflict of Interest question and the PI/Authorized Representative signature on page 2.

OST: Submitting Your Subaward Request Package (cont.)

Review your Subaward Checklist against your OCGA Award Snapshot.

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**Section III: Award Demographics**

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<td>Program Type:</td>
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<td>Award Status:</td>
<td>Awarded/Fully Executed</td>
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<th>Total</th>
<th>F&amp;A Rate</th>
<th>F&amp;A Base</th>
<th>Award Status</th>
<th>Action Type</th>
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<td>$198,765</td>
<td>$107,333</td>
<td>$306,098</td>
<td>0.000 %</td>
<td>MTDC</td>
<td>Awarded/Fully Executed</td>
<td>New</td>
</tr>
<tr>
<td>04/01/2013 - 03/31/2014</td>
<td>$198,765</td>
<td>$107,333</td>
<td>$306,098</td>
<td>0.000 %</td>
<td>MTDC</td>
<td>Anticipated/Committed</td>
<td>Continuation</td>
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<tr>
<td>04/01/2014 - 03/31/2015</td>
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<td>$107,333</td>
<td>$306,098</td>
<td>0.000 %</td>
<td>MTDC</td>
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<td>Continuation</td>
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<td>MTDC</td>
<td>Anticipated/Committed</td>
<td>Continuation</td>
</tr>
</tbody>
</table>

**Section IV: Subawards**

- Proposed Subawards
  - University of Southern California, UC San Diego

- Named Subawards
  - University of Southern California

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A complete Subaward package includes:

- All corresponding Attachments

VII. REQUIRED DOCUMENTS

*Required documents that are incomplete or missing WILL DELAY review and processing.*

<table>
<thead>
<tr>
<th>Required for All Subawards</th>
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<tbody>
<tr>
<td>Completed UCLA Subaward Checklist (this form)</td>
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<tr>
<td>UCLA Subrecipient Commitment Form OR UCLA Letter of Intent (LOI to be used for FDP Expanded Clearinghouse Members only)</td>
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<tr>
<td>UCLA Subrecipient vs Contractor Determination Form</td>
</tr>
<tr>
<td>Subrecipient Statement of Work</td>
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<tr>
<td>Subrecipient Line Item Budget and Justification</td>
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<tr>
<td>Applicable UCLA OCGA Award Snapshot</td>
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<table>
<thead>
<tr>
<th>Required as Applicable</th>
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<tbody>
<tr>
<td>Subrecipient IRB Approval (if working with human subjects)</td>
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<tr>
<td>Subrecipient IACUC Approval (if working with animal subjects)</td>
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<tr>
<td>Subrecipient Stem Cell Approval (if working with stem cells)</td>
</tr>
<tr>
<td>Subrecipient Line Item Cost Share Budget and Justification (if cost share indicated in Section V above)</td>
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<tr>
<td>If indicated by Subrecipient Commitment Form:</td>
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<tr>
<td>Subrecipient Federal Indirect Cost Rate Agreement</td>
</tr>
<tr>
<td>Subrecipient Federal Fringe Benefits Rate Agreement</td>
</tr>
<tr>
<td>PHS Financial COI Disclosure Form (if no PHS FCOI policy)</td>
</tr>
<tr>
<td>Subrecipient Most Recent UG Audit (copy of or hyperlink to) Certificate of Compliance</td>
</tr>
<tr>
<td>Subrecipient Financial Audit Management Questionnaire (if no UG audit)</td>
</tr>
<tr>
<td>UCLA Fair &amp; Reasonable Cost Analysis (For-Profit subrecipients)</td>
</tr>
</tbody>
</table>

*New: Required Documents were submitted complete to OCGA at proposal stage. There are no changes or updates, except as attached (for example, if applicable: revised scope of work and/or budget; subject use approvals; Financial Audit Management Questionnaire; etc.). *

*Amendment: Required Documents were submitted to the OST for a previous action. There are no changes or updates, except as attached (for example, if applicable: revised scope of work and/or budget; subject use approvals; etc.).
OST: Subaward Request Receipt Dates

- Within 30 days of start
- Between 30 and 60 days of start
- Between 60 and 120 days of start
- More than 120 days after start
When you receive an OCGA e-mail Notification confirming the setup of your award, if a subaward or subaward amendment needs to be issued, please be sure to submit your Subaward Checklist package as soon as you are able.
Questions?

• For questions regarding specific subawards, contact the OCGA Outgoing Subaward Team member named in your subaward agreement or send an email to ocgasubawards@research.ucla.edu (for Multi-campus Awards: outgoingMCA@research.ucla.edu). Your question will be forwarded to the Subaward Team member assigned to that Subaward or MCA.

• The e-mail addresses ocgasubawards@research.ucla.edu and outgoingMCA@research.ucla.edu are only for communications regarding outgoing subawards (awards in which funding will flow from UCLA to the subrecipient)

• For quick reference on Outgoing Subaward Required Forms visit our website at: https://ocga.research.ucla.edu/required-forms/

• General questions?

Thank you!
COVID-19 Vaccination Mandates
Certifications to Sponsors
Federal, County of Los Angeles and
City of Los Angeles

Research Administration Forum
March 10, 2022
COVID-19 Vaccination Mandates

The story so far ...

• Executive Order on Ensuring Adequate COVID Safety Protocols for Federal Contractors (EO 14042)
  ◦ Signed by President Biden on 9/9/2021

• Los Angeles County Ordinance 2021-0066U
  ◦ Urgency Ordinance adopted by the Los Angeles County Board of Supervisors on 12/7/2021

• County of Los Angeles Department of Public Health
  ◦ Health Care Work Vaccination Requirement issued 1/12/2022 (revised 2/25/2022)

• City of Los Angeles Ordinance 187134
  ◦ Adopted by the Los Angeles City Council on 8/16/2021
Federal Contractor Vaccination Mandate

Executive Order 14042 Updates

September 9, 2021

**Executive Order 14042**

Federal contracts and contract-like instruments must now include a clause compelling most contractors and subcontractors (at any level) to comply with prescribed COVID-19 workplace safety requirements for the duration of contracted work.

November 30, 2021

**EO Court Challenges**

U.S. District Court in KY rules on a preliminary injunction* that prevents enforcement of the EO in KY, OH and TN

*Federal contractors can voluntarily comply with the EO under preliminary injunctions

December 7, 2021

**EO Enforcement Paused**

U.S. District Court in GA results in a nationwide injunction on enforcing the EO

**Federal government advises it will not enforce the requirements of the EO pending future court decisions**

January 5, 2022

**Appellate Court Ruling**

U.S. Sixth Court of Appeals upheld KY ruling that President exceeded authority under statute by imposing mandate on federal contractors—No change to EO enforcement “Pause”
Los Angeles County Urgency Ordinance 2021-0066U

• Adopted by the County Board of Supervisors on 12/7/2021

• **Mandate:** County contractors to provide vaccinated contractor workers prior to interacting in person with County workforce members and members of the public, or working on County-owned or controlled property.

• Religious and medical exemptions may be granted
KEY DEFINITIONS

Contractor Personnel: All employees of a Contractor, and persons working on its behalf on a Contract with the County, including but not limited to, subcontractors of any tier.

County Workforce Members: The County’s employees, interns, volunteers, and commissioners.

In-Person Services: Contractor Personnel coming into contact with County Workforce Members or the public while performing services under a Contract.

Fully Vaccinated: 2 weeks or more have elapsed since Contractor Personnel received:

1. Second dose in a 2-dose COVID-19 vaccine series (e.g., Pfizer-BioNTech or Moderna);
2. Single-dose COVID-19 vaccine (e.g., Johnson and Johnson's [J&J] Janssen); or
**Los Angeles County Ordinance**

COVID-19 Vaccination Mandate for County Contractors

**Contractual Requirements**

- Full compliance by 1/1/2022 is satisfied by submission to the County, its **Certification of Compliance** (per contract) signed by OCGA.

- OCGA certifies that all UCLA Contractor Personnel who perform *in-person services* in the contract are fully vaccinated or when applicable, provides a list of Contractor Personnel granted a religious/medical exemption.

- UCLA shall maintain records of Proof of Vaccination for Contractor Personnel or exemption status for contract retention period.
• Health Care Worker Vaccination Requirement Order of Health Officer—Issued 1/12/22 (Revised 2/22/2022)

○ Vaccination Requirements for Health Care Workers:
  ◦ Same as LAC Ordinance (Full dose of Pfizer-BioNTech, Moderna, Johnson & Johnson/Janssen, and other specified COVID-19 vaccines)
  ◦ + COVID-19 booster dose
  ◦ Religious and medical exemptions may be granted

○ Contractual Requirements:
  ◦ Full Compliance by 3/1/2022 (extended date)
  ◦ OCGA signs and submits Certificate of Compliance

What are the steps to meet the County’s certification?
PI Responsibilities

- Ensures all Contractor Personnel performing In-Person services complies with LAC Ordinance/County DPH Health Orders vaccination mandate
- Leverages UCLA online COVID-19 Symptom Monitoring and Vaccination Verification System
- Ensures Contractor Personnel granted religious/medical exemptions complies with LAC Ordinance/County DPH Health Orders (mandatory COVID testing enforced)
- Coordinates with UCLA COVID Ctr/HR representative, as needed
- Coordinates consent and other certification documents with OCGA
Adopted by the Los Angeles City Council on 8/16/2021

Mandate: Effective 10/20/21, any new contract executed by the City shall include a clause requiring employees of the contractor and/or persons working on their behalf who interact with City employees, are assigned to work on City property for the provision of services, and/or come into contact with the public during the course of work on behalf of the city to be fully vaccinated. [Religious and medical exemption may be permitted]

Key Definitions
- Contractor Personnel: Employees of Contractor and/or persons working on its behalf, including, but not limited to, subcontractors
- In-Person Services: Performing services under this Agreement and prior to interacting in person with City employees, contractors, volunteers, or members of the public
- Fully Vaccinated: 14 or more days have passed since Contractor Personnel have received the final dose of a two-dose COVID-19 vaccine series (Moderna or Pfizer-BioNTech) or a single dose of a one-dose COVID-19 vaccine (Johnson & Johnson/Janssen) (Boosters required only for High-Risk Settings—follow County of Los Angeles Health Care Worker Vaccination Requirement (LA County DPH Health Officer Order) issued 1/12/22).
• **UCLA PI Responsibilities (Outlined Informed Consent letter)**

  ◦ PI is responsible for all staff performing/will perform in-person services to comply with the City’s mandate

  ◦ PI should leverage UCLA’s online COVID-19 Symptom Monitoring System for UCLA staff and coordinate with local COVID or HR representative, as needed

  ◦ Notify City and OCGA when Contractor Personnel performing in-person services, test positive or have COVID, immediately remove and shall not assign such personnel to perform in-person services

  ◦ PI shall retain, for the retention period of the contract, proof that such Contractor Personnel (performing in-person services) comply with the City mandate
KEY TAKEAWAYS

• **Dynamic Environment**

• **Federal Enforcement of COVID Vaccination Mandate: “paused”**

• **Compliance Challenges**

• **Key Responsibilities:**

  **PI/Department**
  • Ensures all assigned contractor staff complies with local ordinances/COVID 19 vaccination mandates
  • Coordinates with OCGA in securing all consent and other certification documents (including changes) needed to comply with the local ordinances/COVID 19 vaccination mandates

  **OCGA**
  • Signs the County Certification of Compliance on behalf of University
  • Provides general guidance on certification process
Resources/Links

COVID-19 Vaccination Mandates


• County of Los Angeles Ordinance [http://file.lacounty.gov/SDSInter/isd/dbw/1116588_Ordinance.pdf]

• County of Los Angeles Department of Public Health Order of the Health Officer – Health Care Worker Vaccination Requirement [2022.02.25_HOO_HealthCareWorkers (lacounty.gov)]

• FAQs COVID-19 Vaccinations of County Contractor Personnel [http://file.lacounty.gov/SDSInter/isd/dbw/1116875_Final_Contractor_VAX_Mandate_FAQs.pdf]


• UCLA COVID-19 Symptom Monitoring and Vaccination Verification System [https://uclasurveys.co1.qualtrics.com/jfe/form/SV_3qRItouCYKzBbH7]
Reference Materials

COVID-19 Vaccination Mandates

- LAC Ordinance Certification of Compliance (signed by OCGA)
- City of Los Angeles COVID 19 PSC 44 (Contract Term)
Los Angeles County Ordinance

Certification of Compliance Signed by OCGA

Certification of Compliance
Urgency Ordinance, County Code Title 2 – Administration, Division 4 –
Miscellaneous – Chapter 2.212 (COVID-19 Vaccinations of County Contractor
Personnel)

I, __________, on behalf of The Regents of the University of
California by and on behalf of the Department of __________
(the “Contractor”), certify that on County Contract:

All Contractor Personnel on this Contract are fully vaccinated as required
by the Ordinance.

Most Contractor Personnel on this Contract are fully vaccinated as required
by the Ordinance. The Contractor or its employer of record, has granted a valid medical
or religious exemption to the below identified Contractor Personnel. Contractor will
certify weekly that the following unvaccinated Contractor Personnel have tested
negative within 72 hours of starting their work week under the County Contract, unless
the contracting County department requires otherwise. The Contractor Personnel who
have been granted a valid medical or religious exemption are [LIST ALL
CONTRACTOR PERSONNEL].

________________________________________
Signature

________________________________________
Date

________________________________________
Title

________________________________________
Company/Contractor Name
Employees of Contractor and/or persons working on its behalf, including, but not limited to, subcontractors (collectively, “Contractor Personnel”), while performing services under this Agreement and prior to interacting in person with City employees, contractors, volunteers, or members of the public (collectively, “In-Person Services”) must be fully vaccinated against the novel coronavirus 2019 (“COVID-19”).

“Fully vaccinated” means that 14 or more days have passed since Contractor Personnel have received the final dose of a two-dose COVID-19 vaccine series (Moderna or Pfizer-BioNTech) or a single dose of a one-dose COVID-19 vaccine (Johnson & Johnson/Janssen) and all booster doses recommended by the Centers for Disease Control and Prevention. Prior to assigning Contractor Personnel to perform In-Person Services, Contractor shall obtain proof that such Contractor Personnel have been fully vaccinated. Contractor shall retain such proof for the document retention period set forth in this Agreement. Contractor shall grant medical or religious exemptions (“Exemptions”) to Contractor Personnel as required by law. If Contractor wishes to assign Contractor Personnel with Exemptions to perform In-Person Services, Contractor shall require such Contractor Personnel to undergo weekly COVID-19 testing, with the full cost of testing to be borne by Contractor. If Contractor Personnel test positive, they shall not be assigned to perform In-Person Services or, to the extent they have already been performing In-Person Services, shall be immediately removed from those assignments. Furthermore, Contractor shall immediately notify City if Contractor Personnel performing In-Person Services (1) have tested positive for or have been diagnosed with COVID-19, (2) have been informed by a medical professional that they are likely to have COVID-19, or (3) meet the criteria for isolation under applicable government orders.
UCLA/OCGA

Website URL
http://ocga.research.ucla.edu

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Assistant Director
Contracts and Incoming Subawards
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Email: jim.fong@research.ucla.edu
Thank You!

March 10, 2022
Agenda

- Clarification on 700-U DocuSign Certificate of Completion
- Refinements to UCLA NIH Other Support Pages
- Recurring Questions / Issues Related to OS
- Reviewing Other Support Pages
Clarification on 700-U DocuSign Certificate of Completion

Confirm the Certificate of Completion PDF box is checked

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Security Level: Email, Account Authentication (None) Login with SSO

Signature Adoption: Pre-selected Style

This may not always appear. Still ok as long as it has the UCLA email address.
Refinements to UCLA NIH Other Support Pages

Subawards table now prompts for required information and populates the name of the prime sponsor

<table>
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<tr>
<th>Project/Proposal Title</th>
<th>The impact of long covid on smell</th>
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<tbody>
<tr>
<td>Major Goals</td>
<td>&lt;Enter Major Goals for the Subaward&gt;</td>
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<tr>
<td>Status of Support</td>
<td>Pending</td>
</tr>
<tr>
<td>Project Number</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Name of PD/PI</td>
<td>&lt;Enter the name of the Prime PI&gt;</td>
</tr>
<tr>
<td>Source of Support</td>
<td>NIH - National Institutes of Health</td>
</tr>
</tbody>
</table>

Primary Place of Performance: University of California, Los Angeles

Project/Proposal Support Start Date: 9/1/2021
Project/Proposal Support End Date: 8/31/2026
Total Project Award Amount (including Indirect Costs): $208,928

Person Months Per Budget Period

<table>
<thead>
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<th>Year</th>
<th>Cal</th>
<th>Acad</th>
<th>Sum</th>
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<tbody>
<tr>
<td>2022</td>
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<td>0</td>
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</tr>
<tr>
<td>2023</td>
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</tr>
<tr>
<td>2026</td>
<td>0.6</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Other revisions:
• Exclude:
  • Individual fellowships and Federal training grants
  • Preliminary proposals
Recurring Questions / Issues related to OS

Reminders

• DocuSign Certificate of Completion should not be submitted with OS (only required for 700-U)
• Do not include effort for prior periods. Effort is only required for current and future periods
• Do not include the project for which Other Support is being reported
• ‘Person months per budget period’ refers to time actually spent supporting the project NOT the salary charged (same for NSF C&P)
• Support documentation must be included for appointments and employment that a PI has with a foreign entity (i.e., agreement or arrangement is between the PI and the foreign entity)
• Support documentation is not required for agreements that UCLA has entered on behalf of the PI (i.e., when the agreement is between UCLA and the foreign entity)
  ◦ Should still be reported in OS
• Review OS pages before submitting to OCGA
Reviewing Other Support Pages

- Are all active and pending projects included?
- Are there any project types that should be removed? (e.g., institutional training grants)
- Are total costs (direct + indirect) appropriately included?
- Has effort been included for active and pending projects?
- Have subaward details been appropriately included?
- Has potential overlap (scientific, budgetary, commitment) been identified and addressed?
<table>
<thead>
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<th>1</th>
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</thead>
<tbody>
<tr>
<td>Reviewing Other Support Pages</td>
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</tr>
<tr>
<td>If an overlap statement has been included, does it seem reasonable?</td>
<td>1</td>
</tr>
<tr>
<td>Do active and pending in-kind contributions have a $ or effort value?</td>
<td>1</td>
</tr>
<tr>
<td>Has in-kind support been correctly included as OS vs. Facilities,</td>
<td>1</td>
</tr>
<tr>
<td>Other Resources or Equipment</td>
<td>1</td>
</tr>
<tr>
<td>If foreign appointments or employment are referenced, are appropriate</td>
<td>1</td>
</tr>
<tr>
<td>support documents attached?</td>
<td>1</td>
</tr>
<tr>
<td>Has the report been electronically signed (DocuSign)?</td>
<td>1</td>
</tr>
<tr>
<td>Is the signature date current?</td>
<td>1</td>
</tr>
</tbody>
</table>
Thank You
March 2022 Research Administration Forum Q&A

Contract and Grant Administration

Q1: When forms are missing and gets sent back to the departments for additional documentation, does it go back to the bottom of the worklist?

A1: Marcia's opinion: I don't know the answer, but I think they SHOULD go to the bottom of the worklist. Otherwise, we would be encouraging people to submit incomplete packages just to get a place in line. That would increase OCGA workload and would be unfair to those who submit a complete package.

Q2: Is it possible for the team to extend the length of time in the online EPASS system before you get timed-out/kicked off?

A2: I will ask ORIS to extend the time. -Marcia

Q3: After a Subaward is executed by OCGA, can a copy of the Subaward Checklist be forwarded to UCLA Purchasing? Sometimes the Checklist contains specific instructions on the FAUs to use. If this information does not get transmitted to Purchasing, then sometimes Purchasing processes the Subaward using wrong FAUs, which takes additional time to correct.

A3: OST used to do this; however, OST has transitioned to include the FAU on the actual agreement/amendment so that it is right there on the document for Purchasing.

The OST has worked with Purchasing to address this issue. The OST communicates the FAU information, which was provided by the Dept on the Subaward Checklist, to Purchasing via the Subaward Agreement or Amendment (the FAU is usually included on the Subaward Agreement or at the bottom of the amendment). If you see issues with the listed FAU, please do let us know.

Q4: Have there been any thought to create an EPASS like electronic routing for OST to streamline the process and ensure forms are provided upfront?

A4: An electronic form is something that we would like to develop, but this is still something for the future. We might be more able to develop an electronic form once we move into OCGA's internal system.

Q5: I thought for continuation and also new subaward, we have to include the current/updated award synopsis, since the delay in submitting the complete continuation subaward packet. Is the current/updated award synopsis no longer required for continuation? I had a case in which the updated award synopsis was delayed due to CIRC review, hence delay in sending the continuation subaward packet.

A5: The award synopsis is included as a required document in the Attachments section on page 2. But we also encourage the review of the snapshot prior to the submission of your checklist. The snapshot for the current period, along with the award notification e-mail, both are good ways to know when your award is setup. CIRC review is something that needs to happen prior to award setup.
Q6: For Subaward team: AP and Purchasing are really pushing Transcepta on everyone, and a lot of our subawardees have therefore signed up for it. But when they do, we at the department level are not able to see invoices and or certify them in a timely manner. There is no system that updates us when an invoice is uploaded. Right now the average turn-around time for my department to be notified that there is an invoice that they are waiting for a Sub Cert Form is 3 MONTHS, which is unacceptable.

A6: We can share this comment with Purchasing and see if they have a solution.

Q7: For Subaward team: With the new changes that are going to happen with subaward management, is there a way to make MCA’s viewable in the financial system? To either have them show up like a TOF does where we can see ledger detail, or have those invoices routed to us for review and certification before they’re paid, like any other subward? As it is now, we at the department level cannot see ledger detail for any MCA’s, and any sister UC campus gets their invoices paid automatically, without the PI reviewing and certifying their invoices like we have to do with other subs.

A7: I can address your invoice question. UC MCA process under RPAC memo 14-08, the default under that process is for IRRs to be submitted directly to EFM. If you'd like any further detail to be submitted directly to you in addition to the IRRs, let us know on the MCA Checklist in the text box on page 2. In that text box you can add any additional reporting that you'd like to have added.

Q8: Just to confirm that this certification is only if staff or subcontractors have direct contact with county staff. If not, do we need to keep any records for this county requirement?

A8: When LA County requests it, UCLA submits a Certification of Compliance for a specific contract. UCLA certifies that "ALL" or "MOSTLY ALL" Contractor Personnel assigned to a contract are vaccinated. When "MOSTLY ALL" is selected, UCLA is required to provide names of individuals who are not vaccinated and will perform work on County owned, County-controlled property and/or have or will have in-person contact with County Workforce. The County expects all COVID records to be retained for the retention period of the contract.

Q9: Can you please clarify if the COVID vaccine mandate for County and City of LA is applicable only for City or County grants?

A9: Yes, it is specific to City and County contracts and personnel working under them.

Q10: If the title of the project changes after we submit the 700U, do we have to get a new one re-signed in DocuSign?

A10: Yes, if the title changes the form must be updated and signed via DocuSign, otherwise we wouldn’t have any other identifying information to clearly match the signed form with the project.

Q11: What about project number of an active subward? Will that auto-populate?

A11: The parent subaward project number may need to be entered, if not captured due to missing information on the received subaward documentation.
Q12: Clarification needed on this: Do not include the project for which Other Support is being reported. So if this is JIT, we should remove the project from Pending and if this is for RPPR, we should remove it from Active?

A12: For JIT, the project under which the OS is being submitted, does not need to be included on the OS. For the RPPR all items should be included.