OCGA’s Outgoing Subawards Team (OST): Upcoming Form and Website Changes

Research Administration Forum
September 14, 2023
OST: Upcoming Changes

Upcoming Outgoing Subawards Team (OST) changes, to take effect **October 2nd**:

- **Forms**
  - Consolidation of OST forms required at proposal stage
  - Streamlining of form questions
  - Subrecipient information now required at award stage (to help streamline and minimize collection volume)

- **EPASS ‘Subawards’ Tab**
  - Submission of subaward proposal documents via a new EPASS Subawards tab

- **Website**
  - Overall reorganization and redesign to be more customer-focused

- **NIH Policy**
  - New NIH reporting requirements for international subrecipients
OST: Form Changes

Proposal Stage Forms *(Current)*

- FDP LOI
- MCA Commitment
- Subrecipient Commitment & related docs
- Determination Checklist
- Fair & Reasonable
OST: Form Changes

Proposal Stage Forms – *Upcoming Changes Effective October 2nd*

- **FDP LOI**
- **MCA Commitment**
- **Subrecipient Commitment & related docs**
- **Determination Checklist**
- **Fair & Reasonable**

- **‘Universal’ Letter of Intent (Proposal Stage)**
- **Institutional Information Form (Award Stage)**
- **Fair & Reasonable (For-Profit Entities only)**
Proposal Stage Forms – **Effective October 2\textsuperscript{nd}**

- **‘Universal’ Letter of Intent**
  - REQUIRED at proposal stage
  - Project information only
  - ‘Smart’ form for FDP expanded clearinghouse members and sister-UC campuses
    - Alternatively, the OST can accept the Multi-Campus Commitment form, if a sister-UC campus prefers to use it

- **Institutional Information Form**
  - Can be collected at proposal stage, but is not required until award stage
  - FAMQ consolidated into this form, removed when Audit question answered ‘yes’

- **Fair & Reasonable Cost Analysis**
  - Determination consolidated into this form (not required in any other situation)
OST: Proposal Stage Forms

**Required Proposal Documents for all Subrecipient entities:**

- 'Universal' Letter of Intent \((Site)\)
- *For-profit entities only:* Fair and Reasonable Cost Analysis Form \((UCLA)\)

**Plus**

- Site’s Detailed SoW \((Site)\)
- Site’s Detailed Line Item Budget-Justification (including Cost share Budget/Just. if app.) \((Site)\)

**Required Award Documents for Subrecipients who ARE NOT FDP Expanded Clearinghouse Members or Sister-UC campuses:**

- Subrecipient Institutional Information form \((Site)\)
OST: ‘Universal’ Letter of Intent

‘Universal’ Letter of Intent

- Selecting FDP Expanded Clearinghouse Member or Sister-UC Campus will remove the indirect cost rate agreement and FCOI policy questions from the forms – the OST already has access to that information for FDP Expanded Clearinghouse Members and Sister-UC Campuses.
- Selecting Sister-UC Campus will also add a campus drop down and auto-fill the unique entity identification (UEI) number and award e-mail address for the selected campus.
OST: Institutional Information Form

Subrecipient Institutional Information Form

Institutional Information Form

Address:

City:

State:

Postal Code:

Principal Investigator:

Title:

Institution:

Federal and Accountability Transparency Act (FACTA)

Federal funding and Accountability Transparency Act (FACTA) (or equivalent) is applicable to projects funded by the U.S. Federal government.

Yes ☑ No ☐

During the previous fiscal year, the subrecipient organization/institution received 20% or more of its annual gross revenues from Federal awards.

Yes ☑ No ☐

Federal awards were 20% or more of the public non-health gross gross of $5 million or more in annual gross revenues from Federal awards.

Yes ☑ No ☐ (or equivalent) is applicable to projects funded by the U.S. Federal government.

Yes ☑ No ☐

The subrecipient organization/institution has an in compliance with the Uniform Guidance (2 CFR Part 200) and must provide a complete Federal Financial Management Transparency Report (FFMTR) (or equivalent) is applicable to projects funded by the U.S. Federal government.

Yes ☑ No ☐

If "Yes" to all three answers above, provide the name and total compensation of the five (5) most highly compensated officers of the subrecipient entity:

Name

Salary

Total Compensation

Comments (please add additional pages if necessary)

Subrecipient does not have a responsible conduct of research training program.

DEBARMENT AND SUSPENSION

By signing, Subrecipient certifies that:

- Subrecipient, any of its employees or subcontractors in this project, are not debarred, suspended, or otherwise disqualified from participation in Federal assistance programs, Federal contracts, or subcontracts.
- Subrecipient, any of its employees or subcontractors in this project, are not debarred, suspended, or otherwise disqualified from participation in Federal assistance programs, Federal contracts, or subcontracts.
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U.S. Public Health Service (PHS)/National Institutes of Health (NIH) Recipient Agreement

Applicable to projects funded by PHS/NIH:

- The subrecipient organization/institution has satisfied all applicable institutional policies and procedures.
- The subrecipient organization/institution will not have a responsible conduct of research program.
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University of California, Los Angeles (UCLA) Office of Contracts & Grants Administration

Institutional Information Form

Subrecipient Institutional Information Form

Subrecipient does not have a responsible conduct of research training program.

UCLA does not have a responsible conduct of research training program.

Subrecipient does not have a responsible conduct of research training program.

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Subrecipient does not have a responsible conduct of research training program.
OST: Website Changes

OST Website changes:
- More customer focused
- Ease departmental access to OST information, processes and form requirements
OST: EPASS tab

EPASS – Subawards *(Currently)*

Currently all information is gathered in one free text field and one document upload table.

- **Outgoing Agreements?** If yes, attach Subrecipient/MCA Commitment Form(s) or FDP Expanded Clearinghouse Subrecipient Letter(s) of Intent with applicable attachments, and Subrecipient vs. Contractor Determination Checklist for each subaward. See Outgoing Subawards Form for details and forms.
  - Yes
  - No

*List the name of each subaward entity*

- Maximum 500 characters.

*For each subaward entity, attach a single, combined, PDF with the applicable documents for that entity.*

**Upload Outgoing Subaward Documents**

- **File Type:** pdf
  - The individual file sizes cannot exceed 25MB.

*Click the button below to attach a new file.*
OST: EPASS tab

EPASS Subawards Tab – Effective October 2nd
OST: EPASS tab

EPASS Subawards Tab – *Effective October 2nd*

REMINDER: For 325 (Grants) proposals, please contact e4Help@research.ucla.edu if any information in a subrecipient’s institutional profile needs to be updated.

- Subrecipient Legal Name
- Subrecipient PI Name

Is the subrecipient a for-profit entity?
- Yes
- No

Subrecipient Central Administration Contact

- Attach Project/Work Plan

Attachments

- Type
- Files
- Mark for deletion

Does the proposed subaward involve any of the following?
- Human Subjects (HRRP)?
- Embryonic Stem Cell Research Oversight (ESCOR)?
- Genomic Data Sharing?
- Animal Subjects (ARC/ACUC)?
- Dual Use Research of Concern (DURC)?

Subrecipient PI

- Fast Eicher [esx3@uw.edu]
  - Hans-Peter Klein
  - Hans-Peter Klein [hienn@berkeley.org]
  - James De Moor [jamesddemoire@penn.gov]
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  - Lynette Atlas [stap@uw.edu]
OST: New NIH Reporting Requirements

**NOT-OD-23-133** released May 19, 2023 – Notification of new NIH reporting requirements for international subrecipients

- Effective October 1st
- NIH GPS Section 15.2.1 will be updated to include the following (highlights added):
  - For foreign subrecipients, a provision requiring the foreign subrecipient to provide copies of all lab notebooks, all data, and all documentation that supports the research outcomes as described in the progress report. These supporting materials must be provided to prime recipient with each scientific update (no less than once every three months) in line with the timelines outlined in the agreement.
- NIH is encouraging PTE’s to address this compliance requirement with our international subrecipients at proposal stage; it also recommends language in Subrecipient letters of support indicating their awareness of these requirements and the subrecipient’s willingness to abide
- If a subrecipient cannot comply with this new reporting requirement, we will not be able to proceed with the subaward
- “…all lab notebooks, all data and all documentation that supports the research outcomes…”
  - Updated guidance notes documentation should be received at least every 6 months
  - Further information is expected from NIH, updates will be provided as they are received
- NIH oversight: NIH is reserving the right to request copies of UCLA’s subaward agreement and relevant supporting documentation to confirm UCLA’s compliance with this reporting requirement
OST: New NIH Reporting Requirements

• ‘Universal’ Letter of Intent has been updated to include a reference/confirmation to this new NIH reporting requirement

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<tr>
<th>NIH International Subrecipient Reporting Requirements (For non-U.S. Subrecipients only.)</th>
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<td>If the prime sponsor is the U.S. National Institutes of Health (NIH), Subrecipient is aware of the provisions of NIH GPS 15.2.1 requiring that international subrecipients provide copies of all lab notebooks, data, and documentation that support any resulting research outcomes and Subrecipient confirms that it is able to comply with the regular submission of these materials to UCLA (i.e. every 6 months) for the life of the subaward.</td>
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Questions?

• For questions regarding specific outgoing 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 outgoing from UCLA to the subrecipient)

• General questions?

Thank you!