
OCGA UPDATES

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UCLA Research
Administration

OCGA UPDATE TOPICS

01

SUBAWARD PROCESS

Updated process for
requesting POs for
subawards

02

SPONSOR UPDATES

Common Disclosures
SciENCv
Miscellaneous

03

RESEARCH SECURITY

New Review Process
Research Security
Training

Subaward Process

This is a transitional
short- term process

SUBAWARD PROCESS

Requesting a PO for an amendment to a subaward that was transitioned into BB+

1. Dept submits a purchasing requisition to BB+ **NEW**
 - Include subaward checklist
2. Purchasing will review and issue a PO # to OCGA Outgoing Subs Team (OST) only **MODIFIED**
3. OST will draft amendment
4. OST will send a copy of the Fully Executed amendment, incorporating the new PO number to the PI/ dept

SUBAWARD PROCESS (DRAFT FINAL)

Requesting a PO in BB+ for new subaward

1. Department submit a purchase requisition in BB+
 - Include the award snapshot and subaward checklist
2. Purchasing will review and, if needed, work with the dept to correct
3. The requisition is then moved to on-hold status by Purchasing MODIFIED
4. Separately / simultaneously dept submits required subawardee paperwork (including the req #) directly to OST to request drafting of subaward agreement.
5. OST sends Purchasing and dept the executable subaward referencing the NEW
 - Usually, no additional action required by the department
6. Purchasing issues a PO number to OCGA MODIFIED
7. OCGA finalizes the agreement with the sub and then sends the fully executed agreement to the dept

Sponsor Updates

SPONSOR UPDATES: NSF

- NSF PAPPG 24-1
 - Released January 22, 2024
 - Effective Date May 20, 2024
- Common Forms for the Biographical Sketch and Current and Pending Support
 - NSF has required use of SciENCv since October 2023
- Malign Foreign Talent Recruitment Program Certification

SPONSOR UPDATES: NIH

- Forms I and Grants Policy Manual Update
 - Awaiting finalization of Uniform Guidance updates
- Implementing the Common Forms (Biosketch and Current and Pending (Other) Support) in a phased approach
 - Estimating January 2025 for new forms
- SciENCv
 - Forms available in SciENCv – estimating May 2025
 - Will not mandate until SciENCv is more user friendly / institutions can automatically upload their own information

SPONSOR UPDATES: NIH

Reminder:

- Until the Common Forms are fully adopted by NIH, NIH requires applicants and recipients to use the current NIH:
 - Biosketch and Other Support formats for applications,
 - Just-in-Time (JIT) Reports, and
 - Research Performance Progress Reports (RPPRs)
- Electronic signatures and supporting documentation are required
- Failure to follow the appropriate formats may cause NIH to withdraw applications from or delay consideration of funding

SPONSOR UPDATES: OTHER

- DOD working on finalizing arrangements for deployment of Common Forms
 - Anticipating minimal or no customization
- DOE also in mid-review of the Common Forms

Research Security:

UCOP Enhanced Review & Approval Process

“In an era defined by rapid technological advancements and an increasingly interconnected world, the landscape of research security has undergone a profound transformation and continues to evolve. The federal government has prioritized protecting the U.S. research enterprise, issuing new legislation, policies, and regulations”



ENHANCED REVIEW AND
APPROVAL PROCESS



INVENTORY OF INTERNATIONAL
COLLABORATIONS



ROUTINE COMPLIANCE
REPORTING

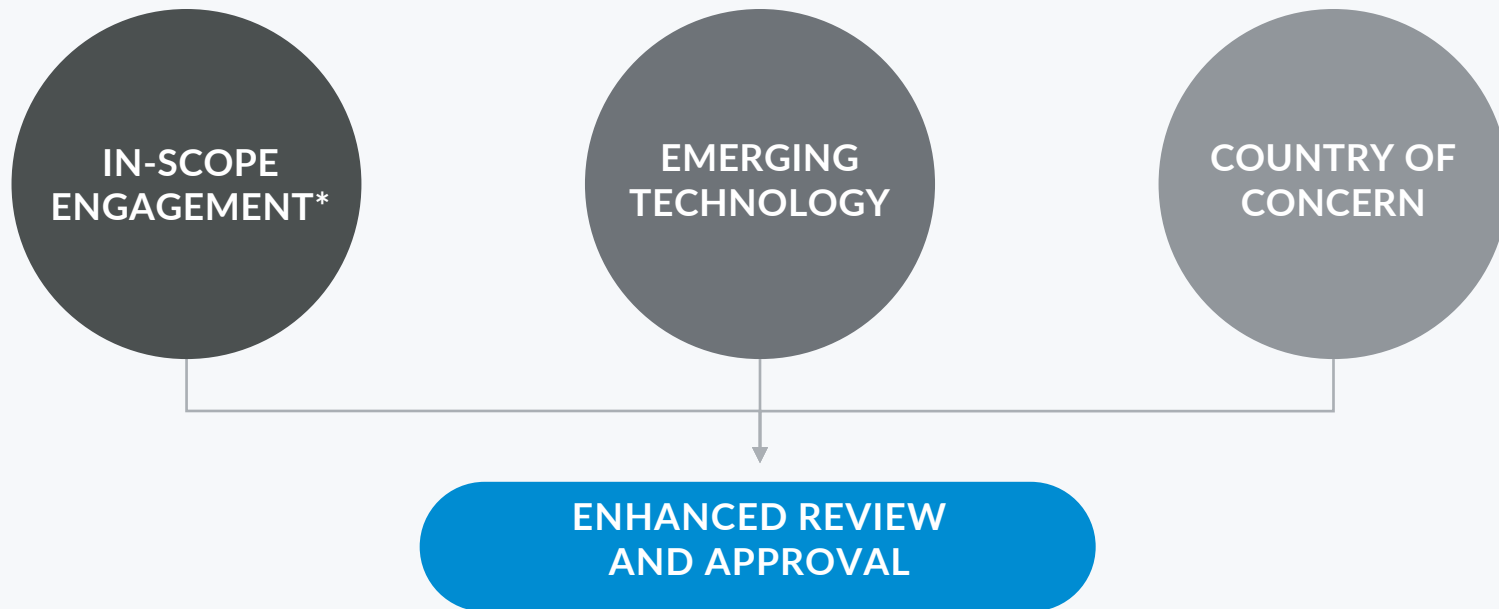
Comprehensive
Framework for UC
international
engagements involving
emerging technology
and countries of
concern

WHAT IS AN ENHANCED REVIEW & APPROVAL PROCESS?

- A review of an in-scope engagement that involves emerging technology and a country of concern
 - Involves identifying and mitigating any relevant legal, compliance, financial, or reputational risks
- Initially vetted by campus then routed to UCOP for evaluation and endorsement
- Continued monitoring after initial approval

WHEN IS AN ENHANCED REVIEW & APPROVAL PROCESS REQUIRED?

**Engagement encompasses engagements, affiliations, agreements and collaborations*



UCOP review is required for projects involving in-scope activities, an emerging technology and a country of concern.



IN-SCOPE ENGAGEMENTS

Engagements, affiliations, agreements and collaborations involving:

- Non-federal sponsored research
- Gifts
- International agreements
- Degree-granting programs
- MOUs



OUT-OF-SCOPE ENGAGEMENTS

- **Federally sponsored:**
 - **Grants and contracts**
 - **Research with foreign subawards**
 - **Research with foreign-located collaborators**

Other out of Scope Activities include:

- Non-Disclosure Agreements, Confidentiality Agreements, Sales & Service Agreements, Material Transfer Agreements, Data Use Agreements, Patents, and IP Licensing, purchasing or procurement, gifts <\$50k from a foreign source associated with a country of concern, degree granting programs without a research component or exchange

UCOP review is not required for out-of-scope engagements even if the activities involve countries of concern and emerging technologies

Still need local (UCLA) research security review to identify and mitigate any relevant legal, compliance, financial, or reputational risks.

ENHANCED REVIEW AND APPROVAL

UCOP is required for projects involving in-scope activities, an emerging technology and a country of concern.



EMERGING TECHNOLOGY

[Sec 1758 of the Export Control Reform Act \(ECRA\)](#)

- Biotechnology
 - Nanobiology
 - Synthetic biology
 - Genomic and genetic engineering
 - Neurotech
- Artificial intelligence (AI) and machine learning
- Positioning and navigational technology
- Microelectronics or Semiconductors
- Advanced computing
- Data analytics technology
- Quantum information and sensing
- Additive manufacturing
- Robotics and autonomous systems
- Brain-computer interfaces
- Hypersonics



COUNTRY(IES) OF CONCERN

Includes more countries that Export Control list

- Qatar
- Saudi Arabia
- United Arab Emirates
- China, including Hong Kong & Macau
- Russia
- Iran
- North Korea

ENHANCED REVIEW AND APPROVAL PROCESS

Detailed process in development

LOCAL (UCLA) REVIEW

Coordination, consultation and input between Academic Leadership, OCGA*, Export Controls, Campus Counsel, Research Compliance and other campus leadership, including the Chancellor

PI/department will be notified that Presidential approval is required prior to submission

UCOP REVIEW AND APPROVAL

If a decision is made to proceed, information will be sent to UCOP detailing the proposed engagement, the review process, the risks identified and an outline of the mitigation steps that have, or will be, taken to address risks

UC ECAS, in consultation with RPAC and UC Legal will review before forwarding for the President's review and approval

CONTINUED MONITORING

Approved engagements will be monitored for:

- Potential material changes
- New regulatory requirements or enforcement priorities, or
- Other changes that might occur as the engagement progresses.

Updated information will be provided to UCOP as necessary

01

02

03

PROPOSAL SUBMISSION

If a proposal is submitted to a funding entity prior to review and approval by the President, the sponsor and proposer (i.e., principal investigator or responsible party) will be notified that approval by the President must be secured before the location can accept a subsequent agreement or support.

Enhanced Review & Approval Process Key Takeaways

- Comments here are limited to sponsored research going through OCGA
- Non-federal research + emerging technology + country of concern
- Contact OCGA / Export Controls Office as early as possible so that we can:
 - Assess if a review will be needed, and
 - Co-ordinate with the parties who may need to be involved

Research Security: Training Videos

RESEARCH SECURITY TRAINING

- **NSPM-33**
 - In an effort to mitigate risks to the nation's research enterprise, universities and research institutions awarded \$50M or more annually in federal sponsored research funding annually must develop Research Security Programs that include research security training
 - Covered research organizations must annually certify their training meets requirements
- **Chips & Science Act**
 - Federal agencies must establish a requirement that each covered individual listed on an award application completes research security training and that institutions certify that this training has been provided

RESEARCH SECURITY TRAINING

Resources

- UCOP Ethics, Compliance and Audit Services – Video Shorts
- NSF – Training Modules
- Links to UCOP and NSF training are UCLA's RPCs [Foreign Engagement webpage](#)

RESEARCH SECURITY TRAINING: UC VIDEO SHORTS

1. Disclosures: Conflicts of Interest and Conflict of Commitments
2. Talent Recruitment Programs
3. International Collaborations
4. Data Security

RESEARCH SECURITY TRAINING: NSF TRAINING MODULES

Four [interactive online research security training modules](#) designed to:

- *‘Facilitate principled international collaboration in an open, transparent and secure environment that safeguards the nation's research ecosystem’.*
- *‘Provide researchers with clear guidelines and effective strategies to protect against existing and emerging research security threats.’*

RESEARCH SECURITY TRAINING: NSF TRAINING MODULES

NSF was tasked with the development of the modules, but they are for the research community at large

- Not limited to NSF funded projects
- Supported by funding from NSF, NIH, DOE and DOD

RESEARCH SECURITY TRAINING: NSF TRAINING MODULES

1. Introduction to Research Security
2. The importance of Disclosure
3. Manage and Mitigate Risk
4. The importance of International Collaboration

Research Security Training: Key Takeaways

- Message today is that videos are available
- Not mandatory ...Yet
- Not limited to NSF funded projects
- More information should be available in the coming months on **who** needs to take **what** training and **when** to meet the new NSPM33 and Chips Act research security training requirements.

Thank You