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 and Announcements – Marcia Smith

• Contract and Grant Administration – Tracey Fraser
  ◦ NIH: Foreign Component, Subawards, and Disclosures

• Human Research Protection Program – Moore Rhys
  ◦ OHRPP Updates

• Extramural Fund Management – Yoon Lee
  ◦ FY23 Single Audit Report

• Ascend 2.0 – Katie Cadle
  ◦ Award Budget Processes and Project Creation
Topics

NIH Foreign Component And Other Disclosure Requirements

NIH International Subawards

Other Updates
NIH Foreign Component & Disclosures

What constitutes a Foreign Component: Prior approval for Foreign Components: Other Disclosure Requirements
The performance of any significant scientific element or segment of a project outside of the United States, either by the recipient or by a researcher employed by a foreign organization, whether or not grant funds are expended.
The performance of any significant scientific element or segment of a project outside of the United States, either by the recipient or by a researcher employed by a foreign organization, whether or not grant funds are expended

Foreign Component: NIH Definition
2-Step Process

Step 1: Will activities or intellectual contributions in support of the UCLA PI’s NIH funded project be performed outside the US?

- NO
  - No Foreign Component
- YES
  - Move to Step 2 to determine if the activities are ‘Significant’
Step 2: Significance

If the answer to any of the listed questions is yes, then there is a Foreign Component

Will the foreign activity or contribution involve human subjects or animals subjects?

Will there be extensive foreign travel by recipient project staff for the purpose of data collection, surveying, sampling, and similar activities?

Will any activity of the project have an impact on U.S. foreign policy through involvement in the affairs or environment of a foreign country?

Will the contribution or activity abroad include direct and significant intellectual contributions to design, conduct or analysis of research in pursuit of specific aims included in the NIH proposal or RPPR?

Will the contribution or activity abroad be considered fundamental or essential to the completion of the proposed aims/scope of work on a specific NIH funded project?
Prior Approval

NIH Foreign Component

The inclusion or addition of a Foreign Component to a NIH funded project requires NIH Prior Approval BEFORE the activity or collaboration begins.

Obtaining Prior Approval for a Foreign Component

- Disclosure in the proposal application
- Subsequent addition requires a Prior Approval request
Example 1

The UCLA PI of a NIH-funded grant has a collaborator outside the U.S. who performs experiments in support of the PI’s NIH-funded project, but there is no subaward of NIH funds from UCLA to the foreign collaborator.

Foreign Component

- Outside of USA.
- Performing experiments in support of the NIH project.
- NIH definition does not require grant funds to be expended for a foreign component to exist.

Reportable as Other Support?

- If it supports the current project, it should be included as part of the Facilities and Other Resources or Equipment section of the application. It is not reportable as Other Support for this project.
- It should be included as an in-kind contribution in Other Support (C&P) for reporting the PI must do for any other projects that don’t directly benefit from the activity.
Example 2

A UCLA PI with an active NIH funded research project plans on taking a four-month sabbatical. He will be based in Italy while on sabbatical. Is this a foreign component requiring NIH prior approval?

Yes?

- Is the PI going to spend most of the time in Italy collecting data or samples pertinent to the NIH project?
- Is the PI going to be working with collaborators at an Italian research institution on activities directly related to the NIH project, using their facilities and equipment?
- Will the activity abroad include direct and significant intellectual contributions to research design, conduct, or analysis of research in pursuit of specific aims included in the NIH proposal or RPPR?

No?

- Is the PI not going to work on the NIH research while in Italy? If so, is prior approval for a reduction in effort required?
- Is the PI going to discuss potential future research opportunities with colleagues at an Italian research entity?
Example 3

A NIH funded UCLA PI has a visiting postdoctoral fellow (a UK citizen) from the University of Oxford (United Kingdom) in her lab. The fellow performs research activities on the NIH funded project while doing all his work at UCLA. The fellow's salary is paid for by the University of Oxford.

Foreign Component?

- If all the fellow’s work on the NIH project is being conducted in the US, there is no foreign component.

Reportable as Other Support?

- If the post-doc is performing research activities in support of the UCLA PI’s research endeavors, then the postdoc’s salary support funded by an external entity must be reported by the UCLA PI in her Other Support as an in-kind resource.
Example 4

A UCLA PI has a NIH grant received through UCLA. The PI also has an appointment and a lab at a university in Singapore. The research being done at the Singapore lab is unrelated to the PI’s NIH project.

### Does this qualify as foreign component?
- No, the foreign work is not part of the NIH-funded project. BUT....

### Does it require UCLA Prior Approval?
- Yes, it’s an APM 025 Category 1 activity requiring an OATS disclosure and prior approval.
- There may be additional internal COI / COC considerations.

### Is it reportable as in-kind Other Support?
- Yes, because it is a resource made available to the researcher in support of their research endeavors, but not directly supporting the NIH project.
- An English translation of the contract between the PI and the foreign institution must be included at JIT (or afterwards if the appointment occurs after the NIH award is made).

### Should it be referenced in his bio-sketch?
- Yes, it’s an affiliation or appointment with a foreign entity.
• Prior NIH approval is always required before work can start on a foreign component.

• Even if a foreign collaborator is not funded by NIH, prior approval by NIH may still be required. This will depend on:
  ◦ The geographic location of where an element / segment of the work is being performed, and
  ◦ The ‘significance’ of the work to the NIH supported project.

• A foreign component does not need to involve a foreign collaborator. The threshold can be met if:
  ◦ The NIH funded project involves extensive foreign travel by UCLA project staff for the purpose of data collection, surveying, sampling, and similar activities, or
  ◦ If significant intellectual contribution to project aims are being conducted at a foreign location (for example when a PI is on sabbatical but is maintaining effort on research projects).

• A foreign national performing work on NIH funded activities at UCLA is not a foreign component.
  ◦ However, depending on how their salary is funded, there may be an Other Support reporting requirement.

• A foreign component may, but does not have to, involve a subaward to the foreign entity / collaborator.

• Inclusion of a future foreign component in an RPPR is an opportunity to obtain approval.
• Reviewing whether a foreign activity meets the threshold for Foreign Component is a good opportunity to also consider the foreign activity in relation to other internal and external approval, disclosure, and reporting requirements.

• Generally, (non-fCOI) disclosure requirements will be fulfilled if a Foreign Component:
  ✓ Has received NIH prior approval, and
  ✓ Is underscored by a UCLA subaward agreement flowing NIH funds to the foreign subawardee (including data sharing and review obligations- see next section), and
  ✓ The NIH funded project is included in the UCLA PIs Other Support reporting.

• If a foreign activity or funding does not meet the threshold for Foreign Component there may still be internal and/or external mandatory prior approval and disclosure requirements. The extent of the approvals and disclosures will depend upon the nature of the activity/funding but could include:
  ◦ Internal UCLA review and approval such as APM 025 Category 1 activity or an approved exception from UCLA Policy 909: Requirement to Submit Proposals and to Receive Awards for Grants and Contracts through the University allowing the PI to submit proposals through an entity other than UCLA.
  ◦ External reporting in Bio sketches, Other (Current & Pending) Support, including in-kind contribution reporting.

• Always check disclosures for consistency and completeness. For example, if the PI reports external employment or a foreign (or domestic) research appointment or affiliation with another entity, it will need to be reported in the PI’s biosketch and will likely need to be included as an in-kind contribution in Other Support.

• Reach out to OCGA leadership if you have questions.
Resources: NIH Foreign Component & Other Disclosures

• **UCLA Resources**
  ◦ OCGA Other Support webpages
  ◦ UCLA Policy 909
  ◦ UC APM 025

• **NIH Resources**
  ◦ NOT- OD-19-114
  ◦ Frequently Asked Questions (FAQs) | grants.nih.gov
  ◦ NIH Disclosures Table (June 2, 2022)
  ◦ NIH GPS
    ◦ Foreign Component Definition
    ◦ Prior Approval Requirement
NIH International Subawards

New Requirements

Process Overview & Resources
Prior Approval for NIH Subawards

Reminder

(Unlike most other sponsors) if a subaward was not included in the original NIH proposal, we generally do not need to request prior approval from NIH to add one later unless:

• Adding the subaward indicates a potential change in scope, OR
• The proposed subawardee is an international entity
NIH International Subawards New Requirements

Enhanced monitoring, documentation and reporting requirements for NIH subawards to international entities, effective January 1, 2024.

UCLA PIs need to ensure they have continued access to their international subrecipient’s lab notebooks, data and documentation supporting the research outcomes described in Research Performance Progress Reports (RPPR) submitted to NIH. Access may be electronic.
• UCLA’s subrecipient **Letter of Intent (LOI)** has been updated to include a section for the international subrecipient institution’s confirmation of the new NIH policy
  ◦ Before submitting to OCGA, please be sure this section is completed if applicable.

• In addition, NIH expects **Letters of Support** from the international subrecipient PI acknowledging awareness of, and agreement to comply with, the requirement. The following language is recommended for inclusion:

  *I agree to provide UCLA access to copies of all lab notebooks, all data, and all documentation that supports the research outcomes as described in the progress report, with a frequency of no less than once per year, in alignment with the timing requirements for Research Performance Progress Report submission. I will work with the UCLA PI before commencing work on the project, to agree to details of how information will be shared, including format, access and frequency.*
Submit required paperwork to OCGA OST, including the OCGA Subaward checklist.

On page 2 of the checklist, be sure to complete the (new) section titled: NIH International Subrecipient Data Collection requirement.

OCGA OST will add terms to the subaward agreement requiring that the subawardee provide access to data and records, but without going into the specific details of how that will occur.
‘When, what and how’ details related to support documentation should be agreed between the UCLA PI and the subawardee PI before the international subawardee efforts commence.

A list of considerations the UCLA PI may want to discuss and agree with the subawardee PI is available on the OCGA OST webpages.

UCLA PI should document details of the ‘when, what and how’ agreement and share it with the subaward PI (e.g., email confirmation between PIs).

UCLA must put a plan in place to retain access to the documentation throughout the life of the award and for three years after the submission of the final financial report.
Guidance for PI Review of Research Records of International Subawardee

Consider the following questions when discussing data access with your subrecipient:

- What types of files does your subrecipient expect to be providing?
  - Hardcopies?
    - How will hardcopies be digitized?
  - Electronic?
    - What type of electronic file?
- What software is used to create the records?
- Will software be needed to read the records?
- What are the expected sizes of files?
- What is the preferred method of access?
- Are there any third-party data licensing requirements?

- Will files include personally identifiable information (PII)?
- PII may need to be removed and information de-identified prior to sharing.
- Should a data repository be setup?
  - Ex. SharePoint, Dropbox, Box, Google Drive, etc.
- When will access be needed?
- How far in advance of the RPPR?
- How often will access be needed?
- How will the UCLA PI document review of the subawardee’s research records?
After Subaward Setup

- Confirm setup of the data repository
- Confirm access to data
- Review data at least annually to confirm that it is properly reflected in the RPPR. Every time the UCLA PI reviews the records, they should document the review.
- NIH will require an attestation in the RPPR, confirming the subrecipient records have been received and reviewed.
- Monitor compliance with the RPPR due date/notice
- Ensure that data and documents collected from the subrecipient are retained on UCLA servers for at least 3 years following submission of the project’s final financial report to NIH.
Resources: NIH Funded International Subawards

• OCGA / OST Resources
  ◦ UCLA Guidance on NIH Foreign Subawards
  ◦ Subrecipient LOI
  ◦ Subaward Checklist

• NIH Resources
  ◦ Policy FAQs: https://grants.nih.gov/faqs/#/subawards.htm?anchor=4304
  ◦ NIH Subawards Page: https://grants.nih.gov/policy/subawards
  ◦ Open Mike blog post: https://nexus.od.nih.gov/all/2023/09/15/further-clarifying-nihs-foreign-subaward-agreement-policy-addressing-community-feedback/
Other Updates

Uniform Guidance

Timeline for Updates?
Pushed back until October 2024

Proposed changes include:

- Increasing subaward MTDC threshold from $25,000 to $50,000
- Increasing equipment threshold from $5,000 to $10,000
- Increasing de minimis F&A rate for a subawardee from 10% to 15%

NSF PAPPG

Effective May 2024
All senior / key personnel must certify that they are not a party to a Malign Foreign Government Talent Program (MFGTP)

GPS March 2024
Roll out of Common Disclosure forms delayed until January 2025
SciENcv target May 2025

OCGA Monthly Training

Completing the EPASS
March 20 @ 9:30am

Electronic EPASS System
March 27 @ 9am
Registration
OHRPP UPDATES

- ELECTRONIC IRB SUBMISSION SYSTEM TRANSITION UPDATE (BRUINIRB)
- SUPPORT FOR SIRB SUBMISSIONS
As a reminder, UCLA is transitioning from webIRB to BruinIRB as our IRB submission system. This transition is using a staged approach. Currently, only the following types of submissions are accepted in BruinIRB:

- **EMERGENCY USE**
- **EXPANDED ACCESS AND RIGHT TO TRY**
- **H.U.D. - HUMANITARIAN USE DEVICE (CLINICAL USE)**
- **RELIANCE STUDIES (WHERE UCLA RELIES ON AN OUTSIDE IRB)**

All other submissions (exempt, expedited and full board) should continue to be submitted in webIRB.
OHRPP will communicate at the earliest possible time when we know when next stages in the transition will take place.

SUBSCRIBE TO HUMAN RESEARCH NEWS (ON THE ORA NEWS SUBSCRIPTION PAGE)

CHECK OHRPP’S ELECTRONIC SUBMISSION SYSTEMS PAGE FOR CURRENT STAGE OF THE TRANSITION

OHRPP WILL BRING A TIMELINE (ONCE AVAILABLE) TO A FUTURE R.A.F.
SIRB/RELIANCE SUPPORT FOR RESEARCHERS

NEW/UPDATED TRAINING MATERIALS

- FAQs for Commercial IRB Review (updated)
- Steps to Serve as the Relying IRB (new)
- Consent Form Checklist for Reliance on External IRBs (updated)

RECORDED TRAINING PRESENTATIONS

- Preparing a Request to Rely on a Commercial IRB (Presenter: Rebecca Flores Stella)
- Preparing Submissions to Advarra (Presenter: Andrew Saunders)
- Preparing Submissions to WCG (Presenter: Andy Parkhurst)

THE RELIANCE TEAM

The OHRPP reliance team is available for consultation and trainings specific to research teams. Please email: irbreliance@research.ucla.edu
"The meaning and limits of IRB approval"
Presented by Moore Rhys, OHRPP

This session will cover what it means (and doesn’t mean) to receive IRB approval. Topics include review of policy 991 which authorizes the IRB to conduct human subjects review and other university policies and practices that may limit the conduct of research, regardless of IRB approval.

Date: Wednesday March 20, 2024
Time: Noon-1pm
Location: Zoom (Register for this meeting)
OHRPP ZOOM DROP-IN

Quality Improvement Unit staff hosts half-hour open Q/A sessions every other week to answer your OHRPP-related questions

Register once to join any session

Upcoming Office Hours:
➢ March 14, 2024, at 2pm
➢ March 28, 2024, at 2pm
FY23 SINGLE AUDIT REPORT
Yoon Lee
PwC started single audit for the fiscal year ended June 30, 2023 in July 2023 and completed in February 2024.

**Overview**

UC receives two audits every year by independent auditors besides numerous audits by sponsoring agencies. These two audits are conducted on parallel leveraging certain audit procedures for both.

**Financial Statement Audit**
- Independent, objective evaluation of financial reports and financial reporting processes to obtain reasonable assurance that financial statements are free from material misstatement.
- In accordance with Generally Accepted Accounting Principles (GAAP) and standards established by Governmental Accounting Standards Board (GASB).

**Single Audit (Uniform Guidance Audit)**
- Independent examination of an entity that expends $750,000 or more of federal assistance to ensure that appropriate internal controls over compliance are in place and that federal funds are spent in compliance with the federal program’s requirements in accordance with Uniform Guidance.
- Single audit is conducted in accordance with Uniform Guidance (2 CFR 200, Subpart F)
SINGLE AUDIT: COMPLIANCE TESTING

- UCLA receives federal funding in various clusters in Research & Development, Student Financial Assistance, and others.

- For FY22-23, PwC focused on the Research & Development clusters and UCLA, UCSF, UCB, and UCSB were selected for full scope testing.

- Compliance testing areas:
  - Allowable costs / Cost principles
  - Cash Management
  - Equipment and Real Property Management
  - Period of Performance
  - Procurement, Suspension and Debarment
  - Reporting
  - Subrecipient monitoring
  - Special Tests and Provisions: Key personnel
SINGLE AUDIT REPORTS

• As part of the Single Audit, the auditor prepares three following reports.
  • The first report provides auditor’s opinion on whether the University’s financial statements are presented in accordance with US Generally Accepted Accounting Principles (GAAP).
  • The second report describes the scope of auditor’s testing of internal controls and compliance and the results of testing in accordance with Generally Accepted Government Auditing Standards (GAGAS).
  • The third report provides auditor’s opinion on compliance with requirements that could have a direct and material effect on each of the selected major federal programs on internal control over compliance in accordance with Uniform Guidance.

• Audit results including auditor’s opinion are summarized in “Schedule of Findings and Questioned Costs” in the report.

• The entire audit report has not been published yet but will be available at:
  • Federal Audit Clearing House
  • University of California UCOP Single Audit reports
SINGLE AUDIT: TERMINOLOGY

A deficiency in internal control exists when:
- The design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct noncompliance on a timely basis.

Significant deficiency:
- A deficiency, or a combination of deficiencies, in internal control over compliance that is less severe than a material weakness in internal control, yet important enough to merit attention by those charged with governance.

Material weakness:
- A deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented or detected and corrected on a timely basis.
# SINGLE AUDIT SUMMARY OF RESULTS

## Financial Statements

<table>
<thead>
<tr>
<th>Type of auditor’s report</th>
<th>Unmodified (clean opinion) “UC Financial statements are presented fairly, in all material respects, in accordance with Generally Accepted Accounting Principles (GAAP)”</th>
</tr>
</thead>
<tbody>
<tr>
<td>Internal control over financial reporting</td>
<td>Material weakness identified? No</td>
</tr>
<tr>
<td></td>
<td>Significant deficiencies identified? Yes</td>
</tr>
<tr>
<td></td>
<td>Noncompliance material to the financial statement? No</td>
</tr>
</tbody>
</table>

## Federal Awards

<table>
<thead>
<tr>
<th>Type of auditor’s report issued on compliance for major programs</th>
<th>Unmodified (clean opinion) “UC compiled, in all material respects, with the types of compliance requirements in accordance with Uniform Guidance”</th>
</tr>
</thead>
<tbody>
<tr>
<td>Internal control over major programs</td>
<td>Material weakness identified? No</td>
</tr>
<tr>
<td></td>
<td>Significant deficiencies identified? Yes</td>
</tr>
<tr>
<td></td>
<td>Any audit findings that are required to be reported in accordance with 2 CFR 200.516(a)? Yes</td>
</tr>
</tbody>
</table>

## Auditee qualified as a low-risk auditee?

Yes
**SINGLE AUDIT: FINDINGS**

- **Financial Reporting Findings:**
  - 2023-001: IT General Controls for Retirement System (Significant Deficiency)

- **Federal Award Findings (No Questioned Costs): UCLA findings are in blue**
  - 2023-002: Transfer of costs from HEERF to FEMA not reported in HEERF quarterly report
  - 2023-003: Equipment and real property management (R&D)
  - 2023-004: Procurement, Suspension and Debarment (R&D)
  - 2023-005: HEERF lack of compliance at one campus - (Significant deficiency)
  - 2023-006: Completeness and accuracy of certain programs on the Prior Year Schedules of Expenditures of Federal Awards (SEFA) - (Significant Deficiency)
  - UCLA BFS submitted management responses for findings 2023-002, 2023-003, and 2023-004 as BFS is responsible for these areas.

- **Did either finding 2023-003 or 2023-004 relate to the subawards UCLA received from pass-through entities?**
  - Yes, all exceptions on “Procurement” were on direct federal awards but exceptions on “Equipment” were noted on subawards at UCLA.
  - If you receive an audit related question from the pass-through entities, forward it to RFCHelp@research.ucla.edu. EFM will handle the question.
SINGLE AUDIT: FINDING IN R&D

• **2023-003**: Equipment and real property management (R&D)
  
  • Requirement: 2 CFR 200.313(d) requires that a physical inventory of equipment acquired in whole or in part under a Federal award must be taken and the results reconciled with the property records at least once every two years.
  
  • Finding: PwC selected seven custodians for equipment observation procedures and noted that two custodians with equipment that had not been inventoried within the two-year timeframe (803 out of 1,541 pieces of equipment from two custodian had not been inventoried within the two-year period)
  
  • Cause: The custodians indicated that they completed the inventories; however, due to the volume of assets they either do not update the dates in the equipment management system or update them well after-the-fact due to a manual process.
  
  • Effect: Federal equipment inventories that are not completed in a timely manner, could result in assets purchased with federal funds not being appropriately safeguarded.
  
  • Management response: UCLA BFS submitted the response including corrective actions and they will be completed by April 30, 2024.
SINGLE AUDIT: FINDING IN R&D

- **2023-004: Procurement, Suspension and Debarment (R&D)**
  - Requirement: 2 CFR 200.318(i) notes that non-Federal entities must maintain records sufficient to detail the history of procurement, including rationale for the method of procurement, selection of contract type, the basis for the contract price and etc. Non-federal entities are also prohibited from contracting with or making subawards under covered transactions to parties that are suspended or debarred.
  - Finding: PwC tested 25 procurement selections and noted that 1) the source selection and price reasonableness justification form was not completed for four selections, 2) suspension and debarment checks were not dated for seven selections, as such, PwC was unable to confirm if these checks were completed in a timely manner, 3) suspension and debarment documentation could not be obtained for six selections, and 4) suspension and debarment certification from was dated after posting of the purchase order. This is a repeat finding of 2021-003, which continued to remain open during FY2022.
  - Cause: Buyer’s lack of understanding of the federal purchase requirements and absence of additional levels of reviews required.
  - Effect: The University may not select a vendor in the most efficient manner without following proper federal procurement procedures and may do business with a vendor that is suspended or debarred.
  - Management response: UCLA BFS submitted the response explaining that the new BruinBuy Plus improved the controls and additional training for the buyers will be provided.
SINGLE AUDIT: PRIOR YEAR FINDINGS

• **2021-003**: Suspension and debarment – remained open during FY22 and a repeated finding: **2023-004**

• **2021-004**: Cash Management – **Resolved**: OMB updated the compliance supplement document to be in consistent with Uniform Guidance.
  - UCLA disagreed with the finding. UCLA maintained the position that we were in compliant with Uniform Guidance and expressed that this finding was the result of inconsistency in the UG requirements and audit procedures required in the OMB compliance supplement document and it did not reflect a lack of internal control in UCLA.

From RAF in August 2022

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Finding 2021-004: Cash management

• Why does PwC call out this as a finding?
  - “Compliance Supplement” is 2CFR Part 200, Appendix XI that provides auditors with audit objectives and suggested audit procedures for determining compliance with federal program’s compliance requirements.
  - OMB Compliance Supplement Part 3. Section C. Cash Management: Audit objective #4 says, “For grants and cooperative agreements to non-federal entities that are paid on a reimbursement basis, supporting documentation shows that the costs for which reimbursement was requested were paid prior to the date of the reimbursement request.”

• Why does UCLA have a different opinion?
  - Requesting reimbursement for the costs incurred and recorded in the Financial System on an accrual basis is compliant with the requirements stated in 2 CFR Part 200.305 Federal Payment. “~minimize the time elapsing between the transfer of funds from the United States Treasury or the pass-through entity and the disbursement by the non-Federal entity ~”. It does not require that a payment must be made before requesting a reimbursement.
  - The definition of “Expenditures” provided in 2 CFR Part 200.1 Definitions further supports this, “Expenditures” on an accrual basis include “the net increase or decrease in the amounts owed by the non-Federal entity for: Goods and other property received; and services performed by employees, contractors, subrecipients, and other payees.
  - This finding is the result of policy inconsistency. In October 2017, Council on Governmental Relations wrote a letter to OMB requesting the Compliance supplement to be amended. OMB has not provided a clarification yet.
SINGLE AUDIT: TAKE AWAYS

• **Thank you** for actively monitoring the sponsored project funds that led us to have successful single audit!

• **Key compliance Requirements applicable to Research and Development**
  • Allowability of costs including cost transfers, cash management, equipment, period of performance, Procurement, suspension and debarment, reporting, subrecipient monitoring, and key personnel effort.

• **Cost Transfers**
  • Process timely. Document answers to cost transfer questions for ALL cost transfers. Auditor's testing is not limited to high-risk cost transfers. Cost transfers without answers indicate lack of basis to support its allowability.

• **Cash Management**
  • All expenses must be recorded in the general ledger before requesting for reimbursement.

• **Period of performance and Reporting**
  • Submit a complete closeout packet timely and maintain documentation for expenses recorded in the general ledger after the project period but reported to the sponsor.

• **Subrecipient expenses**
  • Ensure that the PI's signature is included to indicate the approval of expenses with the date.

• **Key Personnel**
  • Monitor actual effort of key personnel identified in the agreement to ensure that it satisfies the committed effort and certify effort reports on-time.
QUESTIONS?

Contact Information

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

Yoon Lee
Phone: (310) 794-0375
Email: yoon.lee@research.ucla.edu

Audit inquires?
Email: RFCHelp@research.ucla.edu
AGENDA

• Award Budget Process and Project Creation
  • Award and project structure in PPM
  • When a separate project is created
  • Changes to budgeting
  • Introduction to new budget tool
PROJECTS & AWARDS IN THE PPM SUBLEDDER

The graphic below compares Awards, Contracts, and Projects in the future state (PPM Subledger) to their current state equivalents. In future state, separate projects will need to be created when there is a need to track budget and/or expenses separately.

CURRENT STATE (UCLA Financial System)

Today, Fund represents a sponsored award (contract, grant, cooperative agreement, etc.).

Today’s combination of expense account and cost center is a subgrouping of Fund.

FUTURE STATE (Oracle PPM Subledger)

Tomorrow, the equivalent of Fund will be Award.

All billing information will be housed in the Contracts module.

We will budget at the Project level to manage the financial performance of award.
PROJECT CREATION

Certain Awards will require multiple Projects to segregate funding as required by Sponsor terms and conditions or due to requirements of Bruin Finance (Oracle). Projects will be created either through integration from PATS or from the new budget tool.

Central office will set up projects for:
- Multiple Payment Basis
- Concurrent multiple F&A Bases or Rates
- STIP B: for Project use
- Funding restricted by Award terms to be spent for defined purpose (e.g., diversity award)
- Restricted Carryforward
- Funding restricted until certain conditions are met
- Training Grant by Budget Period
- Cost Share*
- Funding restricted for capitalizable Fabrication*
- Program Income*

Departments will set up projects for:
- Multiple Project Owning Organizations
- Multiple PI or Co-Investigators
- Tracking expenses separately as required by terms of award (e.g., reporting by a different task or aim)
- Cost Share*
- Funding restricted for capitalizable Fabrication*
- Program Income*

*Some scenarios may be set up by either Central office or Department. More information will be shared as these business processes are defined.
CHANGES TO BUDGETING PROCESS

The process by which central offices and departments allocate and re-allocate budgets is changing with the transition to Bruin Finance.

CURRENT STATE (UCLA Financial System)

- At inception of Award, ORA allocates the budget at the direct and indirect level
- Departments re-allocate the direct budget based on category as needed

FUTURE STATE (Oracle PPM Subledger)

- ORA allocates the budget by category, in accordance with terms and conditions of Award
- Departments re-allocate awarded budget only when the sponsor restricts re-budgeting
- Re-budget requests require approval

Why are we implementing this change?

- Greater transparency – Allows central offices and departments to see when variances between the awarded budget and actual expenses require a re-budget request to the sponsor
- Alignment with sponsor – Improves compliance to obtain sponsor’s prior approval
- Elimination of non-required transactions – Eliminates re-budgeting activity unless required
- Efficient invoicing – Improves efficiency in invoicing and financial reporting processes
A new budget tool will be leveraged to enable the new process.

**Workflow** will route requests to approvers.

Approved budgets/re-budgets and Projects will integrate to Bruin Finance.

Departments and ORA will use the Budget Tool to enter budgets/re-budgets and create Projects.
WORKFLOW
Budget Tool requests will route to approvers based on the user initiating the change

ORA User
ORA creates project/updates budget & clicks “approve” button ➔ Integrates to Bruin Finance

Project Manager in the CFU that owns the award (Today’s home department fund manager)
Home creates project/updates budget ➔ ORA reviews & approves ➔ Integrates to Bruin Finance

Project Manager in the CFU that does not own the award (Today’s linked department fund manager)
Link creates project/updates budget ➔ Home Project Manager reviews & approves ➔ ORA reviews & approves ➔ Integrates to Bruin Finance
DEPARTMENT USERS – LANDING PAGE

We are going to look at **Create New Project** then **View Project Dashboard**
Users can **search** based on a variety of criteria to identify the Award.
Awards matching the entered criteria will appear in the Results Grid.
DEPARTMENT USERS – CREATE NEW PROJECT

Project List

Upon selecting an Award users will see all Projects on the Award in the Project List.
DEPARTMENT USERS – CREATE NEW PROJECT

New Project Information

Users will enter **demographic information** required to create the Project.

Certain demographics will **automatically populate** based on built in logic.
DEPARTMENT USERS – CREATE NEW PROJECT

New Project will appear for users to **allocate budget** in accordance with terms and conditions.

User can **attach documents** as needed.

### Project Budget

**Create New Project**

**Award Number 9782498 - Project Budget**

<table>
<thead>
<tr>
<th>Item Description</th>
<th>Current Budget</th>
<th>Change in Budget</th>
<th>Updated Budget</th>
<th>Budget</th>
<th>Current Budget</th>
<th>Change in Budget</th>
<th>Updated Budget</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equipment</td>
<td>$40,000.00</td>
<td>-10,000.00</td>
<td>$30,000.00</td>
<td>$30,000.00</td>
<td>$40,000.00</td>
<td>-10,000.00</td>
<td>$30,000.00</td>
</tr>
<tr>
<td>Travel Expenses</td>
<td>$20,000.00</td>
<td>-5,000.00</td>
<td>$15,000.00</td>
<td>$15,000.00</td>
<td>$20,000.00</td>
<td>-5,000.00</td>
<td>$15,000.00</td>
</tr>
<tr>
<td>Materials &amp; Supplies</td>
<td>$10,000.00</td>
<td>-2,000.00</td>
<td>$8,000.00</td>
<td>$8,000.00</td>
<td>$10,000.00</td>
<td>-2,000.00</td>
<td>$8,000.00</td>
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<tr>
<td>Publications</td>
<td>$5,000.00</td>
<td>-1,000.00</td>
<td>$4,000.00</td>
<td>$4,000.00</td>
<td>$5,000.00</td>
<td>-1,000.00</td>
<td>$4,000.00</td>
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<tr>
<td>Consultants</td>
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<td>-1,000.00</td>
<td>$6,000.00</td>
<td>$6,000.00</td>
<td>$7,000.00</td>
<td>-1,000.00</td>
<td>$6,000.00</td>
</tr>
<tr>
<td>Computer Hardware</td>
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<td>-500.00</td>
<td>$2,500.00</td>
<td>$2,500.00</td>
<td>$3,000.00</td>
<td>-500.00</td>
<td>$2,500.00</td>
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<tr>
<td>Subcommittees</td>
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<td>-200.00</td>
<td>$800.00</td>
<td>$800.00</td>
<td>$1,000.00</td>
<td>-200.00</td>
<td>$800.00</td>
</tr>
<tr>
<td>Space Rental</td>
<td>$5,000.00</td>
<td>-1,000.00</td>
<td>$4,000.00</td>
<td>$4,000.00</td>
<td>$5,000.00</td>
<td>-1,000.00</td>
<td>$4,000.00</td>
</tr>
<tr>
<td>Equipment Related to Participant Support Costs</td>
<td>$2,000.00</td>
<td>-400.00</td>
<td>$1,600.00</td>
<td>$1,600.00</td>
<td>$2,000.00</td>
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<td>$1,600.00</td>
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<tr>
<td>Patient Care</td>
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<td>$800.00</td>
<td>$1,000.00</td>
<td>-200.00</td>
<td>$800.00</td>
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<tr>
<td>Other Direct Costs</td>
<td>$2,000.00</td>
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<td>$1,500.00</td>
<td>$1,500.00</td>
<td>$2,000.00</td>
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<tr>
<td>Total Direct Costs</td>
<td>$35,000.00</td>
<td>-5,000.00</td>
<td>$30,000.00</td>
<td>$30,000.00</td>
<td>$35,000.00</td>
<td>-5,000.00</td>
<td>$30,000.00</td>
</tr>
<tr>
<td>F&amp;A Rate Included</td>
<td>$5,000.00</td>
<td>-500.00</td>
<td>$4,500.00</td>
<td>$4,500.00</td>
<td>$5,000.00</td>
<td>-500.00</td>
<td>$4,500.00</td>
</tr>
<tr>
<td>F&amp;A Rate Excluded on Direct and Indirect Costs</td>
<td>$3,000.00</td>
<td>-600.00</td>
<td>$2,400.00</td>
<td>$2,400.00</td>
<td>$3,000.00</td>
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<td>$2,400.00</td>
</tr>
<tr>
<td>Grand Total</td>
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<td>-5,000.00</td>
<td>$35,000.00</td>
<td>$35,000.00</td>
<td>$40,000.00</td>
<td>-5,000.00</td>
<td>$35,000.00</td>
</tr>
</tbody>
</table>

**Documents**

- Attach
After entering the new Project budget the user will be routed to the **Award Summary** which will show all Projects on the award broken down between **Sponsored Funding** and **Other Funding sources**.
DEPARTMENT USERS – CREATE NEW PROJECT

Award Summary

Sum of all Project Types will appear on the right.

Users enter justification for the creation of the Project which will be used during the approval process.
DEPARTMENT USERS – LANDING PAGE

Now we will look at the View Project Dashboard
DEPARTMENT USERS – DASHBOARD/WORKLIST

Project Dashboard

Dashboard contains a Worklist with demographics on the Award including the status of the Project creation or rebudget.
Users can update the search fields to customize the results.
DEPARTMENT USERS – DASHBOARD/WORKLIST

Worklist Results

The **Status** column will show where the request is in the approval process.

The **Oracle Transfer Status** will show if the request has been integrated to Oracle.
CONTACT INFORMATION

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ASCEND 2.0 RESEARCH WEBSITE
https://ascend.ucla.edu/research/overview
Contract and Grant Administration

Q1: Can the campus create some sort of program, similar to eDGE, to have specific questions that PIs need to read/complete on a minimum of annual basis in regard to foreign components? If it is a smart form, I think it would greatly help PIs understand what they need to report.

A1: OCGA continues to issue guidance for C&P (Other) support as sponsor requirements evolve. If and when sponsor requirements become more aligned, it will be possible to streamline guidance.

Q2: Will a new letter of support, with the language you provided, be required for a subaward on an administrative supplement, if that entity is already a subaward on the parent grant? And what if the entity is not on the parent grant? I'm referring to foreign subawardees.

A2: While language regarding NOT-OD-23-182 is not being required for Letters of Support from international subrecipients, OCGA does recommend that the language be included for any proposal requests that represent scope of work changes (ie. additions to or new scopes of work under the parent project).

Q3: Do you suggest that we use $50k MTDC for the subaward on proposal start on Oct. 2024 and forward?

A3: We'll issue guidance nearer the time.

Q4: Is it possible to share the slides after presentations?

A4: The slides for each RAF in 2024 are posted here: https://ora.research.ucla.edu/raf/raf-2024/

Extramural Fund Management

Q1: Will expenses still post to the subledger even if there are no available funds in expense categories?

A1: Yes, expenses will still post to the subledger even if the budget available is insufficient to cover the expenses. We will set the budgetary control in Oracle PPM at the advisory level, which means, the user will get a warning message when trying to make a purchase if sufficient funding is not available, but the user will not be prohibited from proceeding.

Ascend 2.0

Q1: Is there anything ORA can do to help us at the department level to navigate the continuing challenges of BB+? We have wrong faculty members receiving PI notifications to approve subaward invoices that don't belong to them. This is an ongoing problem that hasn't been resolved despite months of emails, tickets, and BB+ office hours. Now there is a big backlog of unpaid subaward invoices, and it is negatively affecting our ability to close out funds in a timely
manner. There are dozens of other issues as well. Can ORA host a joint meeting with the BB+ team to help us address these? Or can they help advocate for us to see improvements in a more timely manner? We would appreciate anything you could do.

A1: We understand the challenges experienced by campus and will take this feedback to the Project Team overseeing the implementation and hypercare.

Q2: Will the project list show the sponsor award number? The current screen copy looks difficult to identify if there are awards by the same sponsor.

A2: Yes, the award search and results grid will contain a variety of demographic details to allow users to distinguish awards by the same sponsor. This will include sponsor award number. Similarly, the project list will include demographic details for each project within a single award.

Q3: Is Project in A2 actually a different concept? B4, Project at Department level is meant to differentiate Expenses. In A2, it is for Budget purposes, correct?

A3: Project represents the P in the POETAF chartstring and is similar to the account-CC concept in current state. Users will both budget and charge expenses at the Project level in PPM.

Q4: When searching from the initial screens, what is the definition of Award Number? Right now, campus uses Fund Number to search and OCGA uses PATS Number to search different systems.

A4: Award number in Oracle PPM will be the same 8 digit number in PATS. The award number in Oracle PPM will be equivalent to the fund number in today's financial system for most single fund number cases. This means in future state there is one less number to remember, as the PATS number = PPM award number (no separate fund number in the financial system).

Q5: If a request is denied, I'm assuming it will be sent back to the preparer with the denial reason. Can the original transaction be amended? Or will the end user need to recreate a new request from scratch?

A5: When an approver returns a request, it will be sent back to the initiator. They have the option to update and re-route through the approval workflow or the ability to withdraw a request if it is no longer needed.

Q6: Regarding the new budgeting tool, would inputting separate projects into this budgeting tool replace the need for doing TOFs? In other words, is this a planning tool, or is this how we will physically transfer funds into different pots?

A6: The budgeting tool will replace the need for doing TOFs by departmental users and will serve both purposes mentioned. Department users will use the tool to reallocate budgets across categories only when sponsors restrict rebudgeting.

Q7: Who approves Project creation?

A7: Most project creation requests initiated by departmental users will be approved by EFM within ORA.

Q8: If we create a new project, or move funds to a new category, and the change is outside the sponsor guidelines (such as greater than a 25% change for the NIH), would ORA review this, and deny the request? Say we move too much money from salary to supplies, or vice versa?
A8: ORA will review all requests to create new projects or rebudget between existing projects to ensure they are in alignment with the sponsor budget. If a rebudget requires sponsor approval and was approved by the sponsor, the request will ultimately be denied by ORA.