



# Research Administration Forum

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June 13, 2024

# Welcome and Reminders

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- 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

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- **Welcome & Announcements** – *Marcia Smith*
- **Human Research Protection Program**
  - OHRPP Updates – *Moore Rhys*
- **Contract and Grant Administration** – *Tracey Fraser*
  - Sponsor Updates
  - Research Security
  - Uniform Guidance Revisions
- **Extramural Fund Management**
  - FY24 Fiscal Closing Schedule – *Val Gomez*
- **Ascend 2.0** – *Katie Cadle*
  - FAU Project and Source Fields
  - Appropriation for the awards with fixed rate including Clinical Trials

An aerial photograph of Los Angeles, California, showing the city skyline with several skyscrapers in the center. In the foreground, the UCLA campus is visible, featuring various academic buildings, a large green field, and a swimming pool. The image is used as a background for a presentation slide.

# OHRPP UPDATES

JUNE 13, 2024

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# OHRPP UPDATES



## ELECTRONIC IRB SUBMISSION SYSTEM TRANSITION UPDATE (BRUINIRB)



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**:

***Applications currently submitted through BruinIRB***



***All other submissions (exempt, expedited and full board) should continue to be submitted in webIRB for now.***



The following types of applications will be moved to BruinIRB in the coming months:

**SEPTEMBER 2024**  
NEW SUBMISSIONS  
(EXEMPT, EXPEDITED &  
FULL BOARD) IN  
BRUINIRB



**OCTOBER 2024**  
AMENDMENT  
APPLICATIONS FOR  
MIGRATED STUDIES  
AND NEW STUDIES  
APPROVED IN BRUINIRB



**JANUARY 2025**  
ALL NEW SUBMISSIONS  
AND SUB-APPLICATIONS  
(PARS, AMS, CRS,  
CRAMS) MUST BE  
SUBMITTED IN BRUINIRB

***Migration of webirb studies will begin in September 2024. Studies will be migrated in batches. For more information on Migration, please come to the Learn at Lunch on 6/25 (link on slide 10)***



OHRPP will communicate through the usual channels if there are adjustments to the timeline:



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



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



**UPCOMING R.A.F.**



*What can study teams do now to set themselves up for success in the transition?*



Best practice is to download approval memos, study snapshots, and approved consents, as IRB applications are approved, but if you haven't kept up, this summer would be a great time to get your study binder in order.

# OHRPP LEARN AT LUNCH

- We have scheduled a number of Learn at Lunch presentations through the end of summer to prepare researchers for the transition. Save the dates!
- All sessions will be recorded and posted on the [OHRPP Youtube channel](#)
- Additional campus-wide and department/research team-specific trainings may also be scheduled, based on demand

## OHRPP LEARN AT LUNCH

### ***“BruinIRB Phase 2 Roll-out Timeline”***

Presented by Rebecca Flores Stella, OHRPP

This session will cover the timetable for transition from webirb to BruinIRB including resources for researchers in the process

*Already presented.* [Recording available](#) on OHRPP's YouTube Channel

# OHRPP LEARN AT LUNCH

## “*BruinIRB Protocol Uploads*”

Presented by Moore Rhys, OHRPP

This session will describe the key difference between webirb and BruinIRB: the ***use of protocol uploads to provide the bulk of information to the IRB***. We'll review the different IRB submission protocol template documents (and how to select which one to use) and supplements for specific types of research and what to do if you have a scientific protocol already created for the research.

*Already presented. [Recording available](#) on OHRPP's  
YouTube Channel*

## OHRPP LEARN AT LUNCH

### *“Migration of Existing Studies from webIRB to BruinIRB”*

Presented by OHRPP BruinIRB Transition Team

This session will discuss how the migration will happen, what notice you'll receive when your study is migrated, and next steps for the research team to complete their applications in BruinIRB

Date: **Tuesday June 25, 2024**

Time: **Noon-1pm**

Location: **Zoom** ([Register](#) for this meeting)

# OHRPP LEARN AT LUNCH

## ***“CRs, CRAMs and AMs in BruinIRB”***

Presented by OHRPP BruinIRB Transition Team

This session will discuss how to submit progress reports (CR), amendments (AM), and “CRAMs” (CR + AM)

Date: **Tuesday July 9, 2024**

Time: **Noon-1pm**

Location: **Zoom** ([Register](#) for this meeting)

# OHRPP LEARN AT LUNCH

## *“How to Submit New Studies in BruinIRB”*

Presented by OHRPP BruinIRB Transition Team

This session will discuss how to submit a new application for IRB/OHRPP review in BruinIRB.

Date: **Wednesday July 24, 2024**

Time: **Noon-1pm**

Location: **Zoom** ([Register](#) for this meeting)

# OHRPP LEARN AT LUNCH

## ***“CRs, CRAMs and AMs in BruinIRB” (live repeat)***

Presented by OHRPP BruinIRB Transition Team

This session will discuss how to submit progress reports (CR), amendments (AM), and “CRAMs” (CR + AM)

Date: **Wednesday August 7 2024**

Time: **Noon-1pm**

Location: **Zoom** ([Register](#) for this meeting)

# OHRPP LEARN AT LUNCH

## *“How to Submit New Studies in BruinIRB” (live repeat)*

Presented by OHRPP BruinIRB Transition Team

This session will discuss how to submit a new application for IRB/OHRPP review in BruinIRB.

Date: **Wednesday August 21, 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:

- June 20, 2024, at 2pm
- June 27, 2024, at 2pm

# OHRPP CONTACT INFORMATION

Presenter Moore Rhys: [moore.rhys@research.ucla.edu](mailto:moore.rhys@research.ucla.edu)

Requests for trainings: [ohrppeqi@research.ucla.edu](mailto:ohrppeqi@research.ucla.edu)

Technical assistance for BruinIRB: [BruinIRB@research.ucla.edu](mailto:BruinIRB@research.ucla.edu)

Requests for specific study consultations:

- For studies already submitted: the OHRPP staff assigned to your protocol or the administrator for the committee to which your study has been assigned
- For studies not yet submitted:  
<https://ohrpp.research.ucla.edu/ohrpp-staff-consults/>

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# OFFICE OF CONTRACT & GRANT ADMINISTRATION UPDATES

JUNE 13<sup>TH</sup>, 2024

RESEARCH ADMINISTRATION FORUM

TRACEY FRASER, SENIOR DIRECTOR, OCGA

**UCLA** Research  
Administration

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# OCGA UPDATE TOPICS

01

## SPONSOR UPDATES

Misc. Updates  
Common Forms  
Implementation

02

## RESEARCH SECURITY

MFTRP UC Resources  
DOD Risk Matrix  
NSF TRUST Program

03

## UNIFORM GUIDANCE

REVISIONS TO  
2 CFR



**SPONSOR UPDATES**

**MISCELLANEOUS**



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# NIH: REPORTING DATA MANAGEMENT AND SHARING (DMS) PLAN ACTIVITIES IN THE RPPR

NIH will issue new DMS RPPR questions that align with the [NIH Final Policy on Data Management and Sharing](#), to include updates on the status of data sharing, repositories and unique identifiers for data that have been shared.

Updated NIH RPPR Instruction Guide will be posted to the [Research Performance Progress Report \(RPPR\)](#) page upon approval from OIRA.

NIH plans to implement the changes for RPPRs submitted on or after October 1, 2024.

[NOT -OD-24-123](#)

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# PROGRAM OFFICIAL OBSERVATIONS

NIH – DMS Plan Content

Often unclear which data will be generated versus shared.

Plans lack important details: species/source, formats shared, amount, metadata.

All data proposed in the Research Plan of the grant applications should be discussed in the DMS plan - not always the case.

When multiple data types are proposed, certain elements for each data type were often missing.

Data should be shared at the time of publication or at the end of the grant period, whichever comes first (many only mentioned one or the other).

Many plans do not name an established repository, or state that data will be shared only through “publication” and “conferences” or “by-request.”

Often, limitations on sharing data are not well-justified and vague reasons are provided (e.g., “ethical issues”, “privacy”, “sufficient quality”).

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## DOJ / HHS AND CLEVELAND CLINIC FOUNDATION (CCF)

### NIH – Recent Settlement Agreement

#### \$7.6M Settlement

- Alleged conduct included:
  - Failure to declare foreign sources of income in JIT and RPPRs.
  - CCF falsely certified to NIH that Other Support was true and accurate.
  - NIH policies prohibit users from sharing passwords / allowing others to make entries on their behalf. Despite this, CCF employees shared eRA Commons passwords and ***at least some of the false submissions were made by CCF employees using the PIs username and password.***



# SPONSOR UPDATES

## COMMON FORMS IMPLEMENTATION



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## WHAT ARE THE COMMON FORMS?

### Update on Agency Implementation of Common Forms

Implementation of NSPM 33 related to Disclosure Requirements and Standardization

Objective is to, "Provide clarity regarding disclosure requirements (e.g., who discloses what, relevant limitations and exclusions), disclosure process (e.g., updates, corrections, certification, and provision of supporting documentation), and expected degree of cross-agency uniformity"

- [Biographical Sketch](#)
- [Current and Pending \(Other\) Support](#)

Forms were developed by National Science and Technology Council ([NSTC](#)) [Research Security Subcommittee](#)

The National Science Foundation (NSF) is the [steward for these common forms](#)

NSF is also responsible for posting and maintaining the table entitled, [NSPM-33 Implementation Guidance Pre- and Post-award Disclosures Relating to the Biographical Sketch and Current and Pending \(Other\) Support](#).

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## PLANNED NIH IMPLEMENTATION



Must use the Common Forms for both Biographical Sketch and Current and Pending (Other) Support for all applications and RPPRs submitted on or after **May 25, 2025**



Will be required to obtain an ORCID ID and enter it in the Persistent Identifier (PID) section of the Common Forms.



Must also link ORCID ID to eRA Commons Personal Profile.



No deviations from the common forms BUT... NIH will have a separate supplement form to collect required agency specific data elements (i.e. Personal Statement, Contributions to Science and Honors)

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# PLANNED NIH IMPLEMENTATION

## Use of SciENcv

Applicants/Recipients will be required to use Science Experts Network Curriculum Vitae (SciENcv) for completing and certifying the Common Forms.

SciENcv will generate a digitally certified PDF for use in application submission.

NIH OPERA is working with SciENcv to develop compatibility features [e.g., Application Programming Interface (API)] to assist entities with full implementation in May 2025.

- External API will assist applicants with populating data from internal systems into SciENcv
- Internal API will allow NIH to capture structured data from the Common Form

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# SUBMITTING PROPOSALS, JIT AND RPPRS BEFORE ADOPTION OF COMMON FORMS

## NIH Reminder

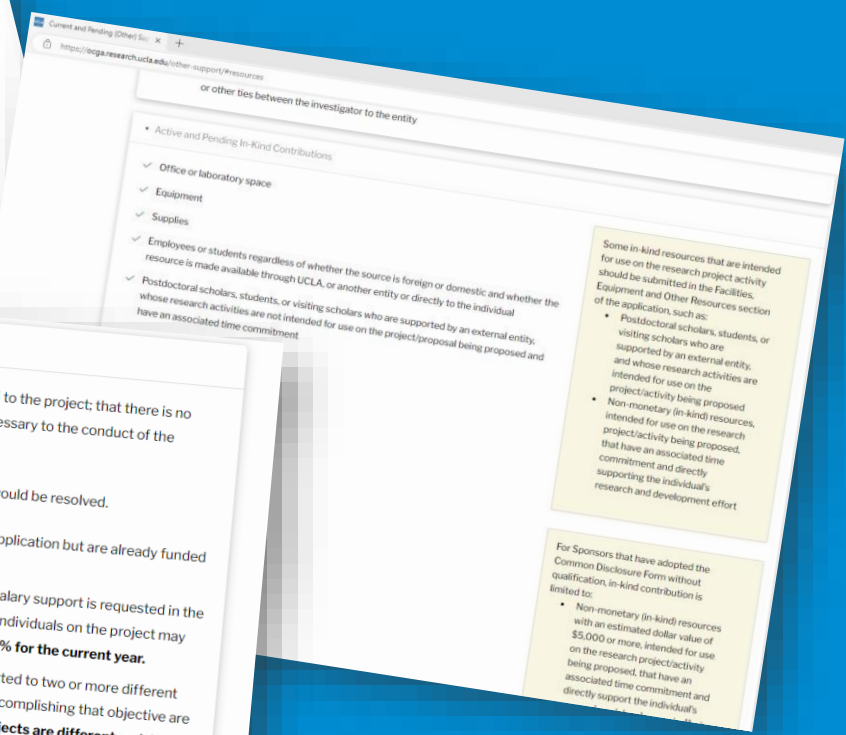
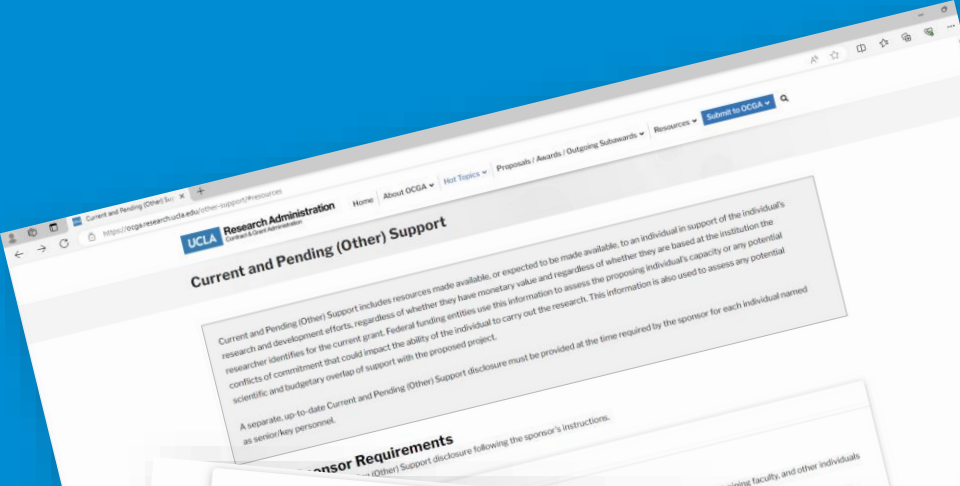
Until the Common Forms are fully adopted, NIH requires applicants and recipients to use the current NIH Biosketch and Other Support formats for applications, Just-in-Time (JIT) Reports, and Research Performance Progress Reports (RPPRs).

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.

*Reminder:  
RPPRs must now  
include pending  
proposals in OS  
(previously only  
active OS was  
required for  
RPPRs)*

# Current and Pending (Other) Support | UCLA Office of Contract and Grant Administration



## Current and Pending (Other) Support

Current and Pending (Other) Support includes resources made available, or expected to be made available, to an individual in support of the individual's research and development efforts, regardless of whether they have monetary value and regardless of whether they are based at the institution the researcher identifies for the current grant. Federal funding entities use this information to assess the proposing individual's capacity or any potential conflicts of commitment that could impact the ability of the individual to carry out the research. This information is also used to assess any potential scientific and budgetary overlap of support with the proposed project.

A separate, up-to-date Current and Pending (Other) Support disclosure must be provided at the time required by the sponsor for each individual named as senior/key personnel.

## Sponsor Requirements

### Overlap Statement

The goals in identifying and eliminating overlap are to ensure that sufficient and appropriate levels of effort are committed to the project; that there is no duplication of funding for scientific aims, specific budgetary items, or an individual's level of effort; and that only funds necessary to the conduct of the approved project are included in the award.

Identify any scientific, budgetary, or effort overlap that would occur if the current proposal were funded. Then state how it would be resolved.

- Budgetary overlap occurs when duplicate or equivalent budgetary items (e.g. equipment, salary) are requested in an application but are already funded by another source. **Explain how the projects are different and do not represent overlap.**
- Effort overlap occurs when a person's time commitment exceeds 100 percent (i.e. 12 person months), whether or not salary support is requested in the application. While information on other support is only requested for Senior/key Personnel (excluding consultants), no individuals on the project may have commitments in excess of 100 percent or 12 person months. **Explain how effort will be adjusted to be below 100% for the current year.**
- Scientific overlap occurs when: (1) substantially the same research is proposed in more than one application or is submitted to two or more different funding sources for review and funding consideration, or (2) a specific research objective and the research design for accomplishing that objective are the same or closely related in two or more applications or awards, regardless of the funding source. **Explain how the projects are different and do not represent overlap.**

# OTHER FEDERAL SPONSORS IMPLEMENTATION

## DOE

- Anticipated implementation date of the Common Forms is May 2025
- No deviations to the Common Form except for the certification statement
- Beginning May 2025 ORCID will be required (optional until then)
- Exploring SciENcv as an option for electronic implementation

## DOD

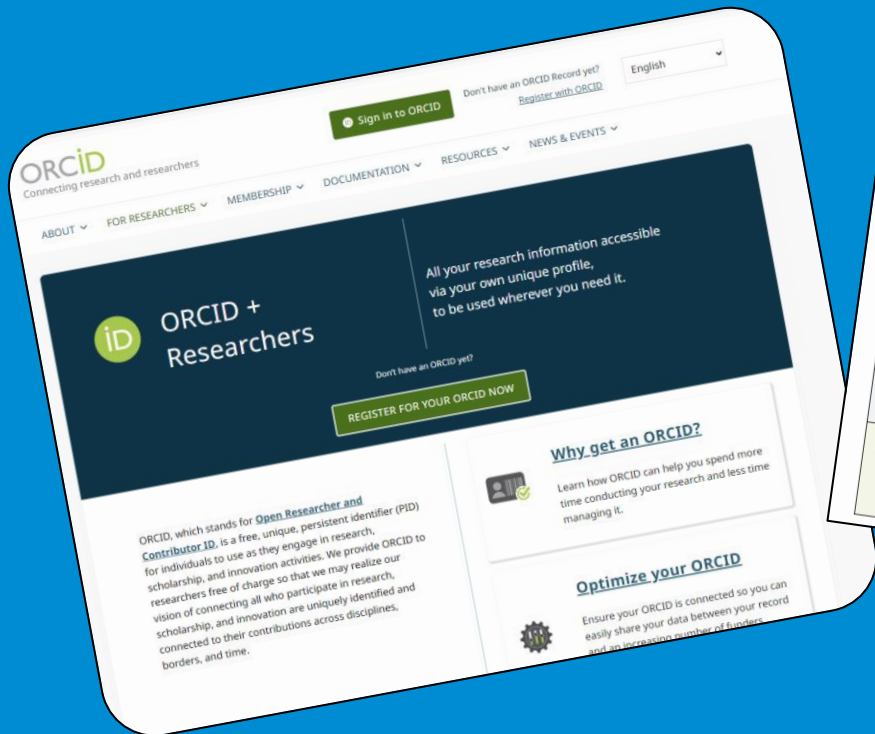
- Anticipated implementation date October 1, 2024\*
- Not asking for any deviations to the Common Form
- Will likely stop requesting information on recently completed awards
- No official policy (yet) on mandatory use of ORCID
- Not using SciENcv for initial roll out

## NASA

- Anticipated implementation date is October 1, 2024
- Anticipated implementation of Common Forms will include deviations

## NSF




- Mandatory use of Common Forms since May 2024
- PAPPG (NSF 24-1) contains NSF's implementation
- ORCID recommended but not mandatory (yet)
- SciENcv mandatory since October 2023
- Senior personnel must certify that they are not a party to a MFTRP
- All federal agencies will ultimately require such a certification



## Our Mission

In order to realize our vision, ORCID strives to enable transparent and trustworthy connections between researchers, their contributions, and their affiliations by providing a unique, persistent identifier for individuals to use as they engage in research, scholarship, and innovation activities.

We do this by providing three interrelated services:

	The <b>ORCID ID</b> : a unique, persistent identifier free of charge to researchers
	An <b>ORCID record</b> connected to the ORCID ID, and
	A set of <b>Application Programming Interfaces (APIs)</b> , as well as the services and support of communities of practice that enable interoperability between an ORCID record and member organizations so researchers can choose to allow connection of their ID with their affiliations and contributions



ORCID – Connecting research and researchers

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# RESEARCH SECURITY UPDATES

**MALIGN FOREIGN TALENT RECRUITMENT PROGRAMS / UC RESOURCES**  
**DOD RESEARCH RISK APPROACH & MATRIX**  
**NSF TRUST PROGRAM**

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# MALIGN FOREIGN TALENT RECRUITMENT PROGRAM

## Prohibition by Federal Agencies

UCOP ECAS recently issued a MFTRP Prohibition [alert](#) for researchers with information on MFTRPs and resources to help mitigate risks.



Key Take Away: Being party to a MFTRP may prevent you from receiving federal funding

Indicators of a MFTRP

- A written or verbal agreement such as an employment agreement or memorandum of understanding.
- Promised compensation that might include such things as cash or in-kind compensation, research support, complimentary travel, and honorific titles.
- An arrangement that typically includes a non-U.S. university and UC researcher, but doesn't always include the UC researcher's institution.
- Support that might be from a non-U.S. government national, provincial, or local sector or include a private entity.
- Requirement that the researcher comply with the laws of the non-U.S. nation.
- Requirement that the researcher commit effort/time in the talent program resulting in conflict of commitment or interest in excess of the standard UC and/or U.S. federal agency requirements.

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# RESEARCH SECURITY

Other UCOP Research Security Resources



For more detailed information including definitions of a Foreign Talent Recruitment Program and MFTRP visit the [ECAS Foreign Talent Recruitment Program website](#)



Visit the [Research Security Resources](#) website for guidance and information from the federal government and UC.



UC resources include the [Research Security Video](#) series that introduces UC researchers, administrators and others to the four key elements of Research Security Program requirements.

Department of Defense

Risk-Based Security Reviews of  
Fundamental Research

# Policy for Risk-Based Security Reviews of Fundamental Research

Bindu R. Nair  
Director, Basic Research  
OUSD(R&E)

9/12/2023

Controlled by: OUSD(R&E)  
Controlled by: Basic Research Office  
Category: Unclassified  
Distribution: A  
POC: Bindu Nair, (571) 372-6418



Distribution Statement A: Approved for public release; distribution unlimited.

Distribution A



UNCLASSIFIED

## Outline

- Fundamental research and the open research enterprise
- Policy on risk-based security review processes pursuant to National Security Presidential Memorandum-33
  - New risk-based security review policy
  - DoD Component risk-based security reviews
  - Mitigation or rejection decisions
  - Oversight by the Office of the Under Secretary of Defense for Research and Engineering
  - Decision matrix
  - 1286 lists

UNCLASSIFIED/Distribution A

2



## DoD's policy stems from an interagency directive

2021: National Security Presidential Memorandum – 33 (NSPM-33)

- ❑ NSPM-33 is an interagency coordinated activity to address foreign influence at academic institutions
- ❑ One directive is that heads of research funding agencies require disclosure of information related to potential **conflicts of interest & commitment** from participants in Federally-funded R&D
- ❑ 2022 National Science and Technology Council Implementation Guidance states: "Agencies should incorporate measures that are risk-based, in the sense that they provide meaningful contributions to addressing identified risks to research security and integrity and offer tangible benefit that justifies any accompanying cost or burden"

UNCLASSIFIED/Distribution A

*“Every fundamental research proposal selected for award based on technical merit will undergo a risk-based review”*



## Policy for Risk-Based Security Reviews of Fundamental Research Policy

- The Countering Unwanted Foreign Influence in Department-Funded Research Institutions of Higher Education policy and enclosures was publicly released June 30, 2023
- **Policy for risk-based security reviews of fundamental research**
  - Intent is to ensure consistent application of risk-based security reviews for fundamental research project proposals across the DoD
- **DoD Component Decision Matrix to Inform Fundamental Research Proposal Mitigation Decisions**
  - A guide to assist program managers and DoD components in reviewing fundamental research proposals for potential conflicts of interest and conflicts of commitment.
- **FY22 Lists Published in Response to Section 1286 of NDAA 2019**
  - The 1286 List includes foreign institutions that have been confirmed as engaging in problematic activity as described in Section 1286(c)(8)(A) of the NDAA for FY 2019, as amended. It also identifies the foreign talent programs that have been confirmed as posing a threat to the national security interests of the United States as described in Section 1286(c)(9)(A) of the NDAA for FY 2019, as amended. Per the Decision Matrix, certain engagements with these institutions will require mitigation before a proposal can be funded.

UNCLASSIFIED/Distribution A

*“The Department will not discriminate on the basis of race or national origin”*



RELEASE  
IMMEDIATE RELEASE

### Department of Defense Strengthening Efforts to Counter Unwanted Foreign Influence on DOD-Funded Research at Institutions of Higher Education

June 30, 2023 | f t in

The Department of Defense today announced the publication of a list of foreign entities that have been confirmed as engaging in problematic activity as described in Section 1286 of the Fiscal Year 2019 National Defense Authorization Act, as amended. These include practices and behaviors that increase the likelihood that DOD-funded research and development efforts will be misappropriated to the detriment of national or economic security or be subject to violations of research integrity or foreign government interference.

"Protecting and maintaining the integrity of our research enterprise is integral to national security," said Heidi Shyu, Under Secretary of Defense for Research and Engineering (USD(R&E)). "The publication of these foreign entities underscores our commitment to ensuring the responsible use of federal research funding and safeguarding our critical technologies from exploitation or compromise."

<https://www.defense.gov/News/Releases/Release/Article/3445601/department-of-defense-strengthening-efforts-to-counter-unwanted-foreign-influen/>

<https://media.defense.gov/2023/Jun/29/2003251160/-1-1/1/COUNTERING-UNWANTED-INFLUENCE-IN-DEPARTMENT-FUNDED-RESEARCH-AT-INSTITUTIONS-OF-HIGHER-EDUCATION.PDF>

# DOD Matrix Considers Four Areas

## Foreign Talent Recruitment Programs

- A way a Foreign Country of Concern (FCOC) corrupts the open research enterprise is by conducting secretive dealings between recipients and the FCOC, including transfer of knowledge and personnel outside of norms.

## Funding Sources

- Accepting funding from FCOCs may create a conflicting obligation to that FCOC

## Patents

- Patents arising from US-funded research filed in a foreign country before being filed in the U.S. can be an indicator of undisclosed agreements with a foreign country

## Entity Lists

- Problematic actors that affiliation or association with could create a conflict of interest or conflict of commitment

**ARO has focused on co-authorship with other researchers that list a FCOC entity as an affiliation**



## Mitigating potential risks

- Mitigation is the preferred option for Components to take concerning any risks uncovered
- Mitigation measure examples:
  - Require the covered individual(s) to complete insider risk awareness training;
  - Require increased frequency of reporting by the covered individual(s) through the Research Performance and Progress Report (RPPR);
  - Replace individuals listed in the fundamental research project proposal who are deemed a research security risk;
  - Provide DoD the covered individual's(s') contracts for review and clarify relationships, affiliations, and/or associations considered risky; and
  - Require the covered individual(s) to resign from positions deemed problematic by the risk-based security review.

# National Science Foundation

Risk-Mitigation Process

- Announced by NSF June 5<sup>th</sup> 2024
- Pilot goes live October 1<sup>st</sup>, 2024 (FY25)

“Avoid the targeting of individuals based on nationality or country of origin. Protect core values of fairness and due process throughout.”

## TRUST Trusted Research Using Safeguards and Transparency

### Legislative Requirements

#### Section 10331 of the CHIPS and Science Act of 2022

- *Perform risk assessments [...] of Foundation proposals and awards using analytical tools to assess nondisclosures of required information;*
- *Establish policies and procedures for identifying, communicating, and addressing security risks that threaten the integrity of Foundation-supported research and development; and*
- *Conduct or facilitate due diligence with regard to applications for research and development awards from the Foundation prior to making such awards.*

#### Section 10339 of the CHIPS and Science Act of 2022

- NSF to *identify research areas [...] that may involve access to controlled unclassified or classified information* and exercise due diligence in granting access to individuals working on such research who are employees of the Foundation or covered individuals on research and development awards funded by the Foundation

#### FY23 Appropriations Report

- Directs the NSF to collaborate with the Secretary of Defense and the Director of National Intelligence to *compile and maintain a list of all NSF-funded open-source research capabilities that are known or suspected to have an impact on foreign military operations*
- The list shall be reviewed and updated at least annually by the NSF in collaboration with the Secretary of Defense and the Director of National Intelligence, and subsequently shall be reported to the Committee

“Avoid curtailing beneficial activities due to risk aversion or overly broad interpretation of policy”



# TRUST: "Trusted Research Using Safeguards and Transparency"

Evaluate Three Criteria, with transparent step by step process:

- 1) Appointments and positions w/ U.S. proscribed parties and are not a party to a malign foreign government talent recruitment program (MFTRP)
  - U.S. Bureau of Industry and Security Entity List
  - Annex of Executive Order (EO) 14032 or superseding EOs
  - Sec. 1260H of the National Defense Authorization Act (NDAA) for FY2021 - Sec. 1286 of the NDAA for FY2019, as amended
- 2) Nondisclosures of appointments, activities and sources of financial support (current research security policy)
- 3) Potential foreseeable national security applications of the research

OCRSSP will confirm that senior personnel have no **active appointments and positions with U.S. proscribed parties**, and that they are not **a party to a malign foreign talent recruitment program**

Undisclosed information will be examined from the time NSPM-33 Implementation Plan was released (Jan 2022)



# TRUST Process

Appointments and positions w/  
U.S. Proscribed Parties and  
MFTRPs



OCRSSP conduct analytics



Research Security Review Team  
to identify mitigation



OCRSSP and the institution will  
work together to mitigate risk

Nondisclosures (Current  
Research Security Policy)



OCRSSP conduct analytics



Research Security Review Team  
to identify mitigation



OCRSSP and the institution will  
work together to mitigate risk

National Security Application of  
the Research



OCRSSP Keyword Automated  
Review



Research Security Review  
Team



External USG consultation  
coordinated through ODNI (if  
needed)



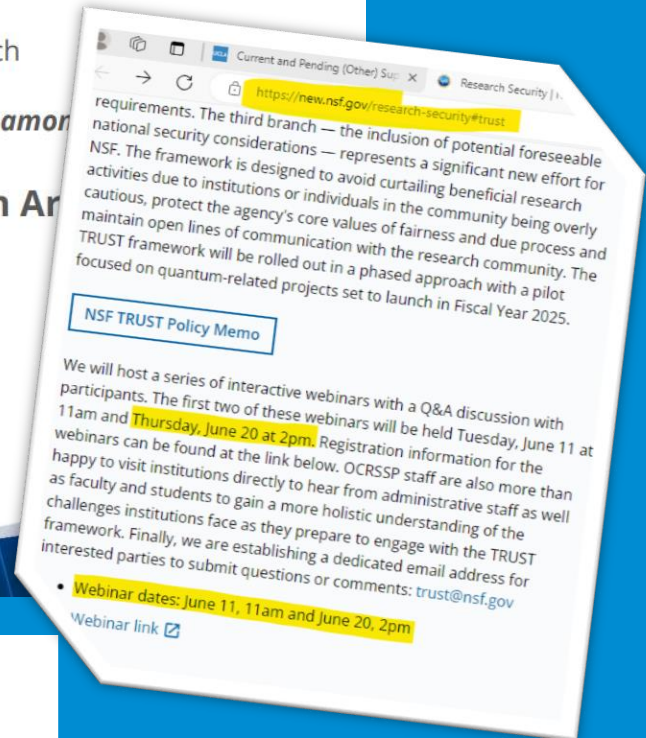
# TRUST Implementation

NSF clarified that FY25 means from October 1, 2024

- **Phase 1 – Quantum Proposals – beginning FY25**
  - Pilot program will be an *iterative process* and NSF will assess:
    - Implementation of new Tiger Team process
    - Timeline of process, bandwidth and resources required from NSF staff
    - NSF's ability to assess potential national security application of the research
    - How often NSF needs external consultation
    - **Continued External Engagement – Listening Sessions with FDP Members, among others**
- **Phase 2 – PAPPG Changes & Expand to some CHIPS+ Key Tech Areas**
  - Information to assess certain criteria are not currently in solicitations
  - Consider expansion to Microelectronics, AI, and Biotechnology.
- **Phase 3 – Scale up Review for all CHIPS+ Key Tech Areas**
  - NSF Staff will have more familiarity with the process
  - Mitigations will be more streamlined, expediting the review process



[Research Security | NSF - National Science Foundation](#)



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# 2024 REVISIONS TO 2 CFR

UNIFORM GUIDANCE

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# THRESHOLDS FOR PROPOSALS

2 CFR Revisions

- OMB Guidance for Federal Financial assistance released on April 22<sup>nd</sup>, 2024
- Goes Live on October 1, 2024
  - However, HHS DCA position is that increased limits to Equipment Capitalization Threshold (\$5k up to \$10k) and / or MTDC for subawards (first \$25k to \$50k) require changes to approved indirect cost rate agreements
  - OMB may not have the same perspective
  - For now, continue to use current thresholds in proposals until further guidance is provided

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# UPCOMING OCGA MONTHLY TRAINING

[Register for each session individually](#)

Preparing an NIH Multiple Component/Project  
Application NIH ASSIST  
July 17, 2024

Award Processing  
August 21, 2024

S2S Grants Basics  
September 18, 2024

Completing the EPASS  
October 16, 2024

Electronic EPASS System  
October 23, 2024

Post-Submission Requirements  
November 20, 2024



Questions About  
Today's Topics?



FISCAL YEAR 2023-24 CLOSING DEADLINE

*Val Gomez*

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# FISCAL YEAR END PREPARATION

- Business and Finance Solutions ([BFS](#)) has released the 2023-24 fiscal closing instructions.
  - Review the [Fiscal Closing Letter](#) and [Schedule of Deadlines](#) to identify deadlines applicable to your area
  - Questions concerning the deadlines should be directed to the person or department shown within the schedule.
  - For questions about the schedule, please [complete the online form](#)
- From now and continuing through FYE Close **conduct your monthly reconciliation to ensure that all financial activity is accurately recorded**
  - Ensure invoices received from vendors and subcontractors are submitted to the Accounts Payable office timely
  - Process cost transfers, salary cost transfers/Direct Retros if needed
  - Post/Approve income and expense deferrals, or accruals, budget adjustments and any other necessary corrections by the established deadlines

# FYE CLOSE – DEPARTMENT DEADLINE FOR SUBMISSION TO EFM

- Important deadlines to note

Description	Deadline to Submit to EFM for Review & Processing	Deadline for EFM to Review, Approve, & Process
Payroll (UCPath) Direct Retro Expense Transfer	Friday, 6/28/2024 (5:00 PM)	Wednesday, 7/03/2024 (5:00 PM)
Payroll (UCPath) Salary Cost Transfer	Friday, 6/28/2024 (5:00 PM)	Friday, 7/05/2024 (5:00 PM)
PPS Payroll Cost Transfer Journal Request	Friday, 6/28/2024 (5:00 PM)	Monday, 7/15/2024 (8:00 PM)
Non-Payroll Expense Adjustments (NPEAR)	Friday, 7/05/2024 (5:00PM)	Monday, 7/15/2024 (8:00 PM)
Accrual/Deferral Forms and Supporting Documents	Monday, 7/08/2024 (10:00AM)	Monday, 7/15/2024 (8:00 PM)
June Prelim Ledger Close		Monday, 7/15/2024 (8:00 PM)

- Review and Approval of Cost Transfers submitted after the deadlines above cannot be guaranteed by EFM
- Expense transfers not reviewed due to late submission will be reviewed and processed for FY 2024-25

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# FISCAL YEAR END ACCRUALS & DEFERRALS

- **When are accruals required and why do they matter?**
  - UC/UCLA financial statements are prepared on an “accrual basis” where expenses incurred in a fiscal year are recorded to the year which goods and services were rendered
  - Accrual entries are needed if invoices for goods and services rendered in FY23-24 were not recorded in the general ledger for FY23-24

As of June 30, the General Ledger should accurately reflect the financial results of your business activity for the fiscal year.

- Accrual forms, justification template, and instructions are available on the [BFS website](#)
- For sponsored research funds:
  - To accrue expenses, submit Form E, to accrue income, submit Form G.
  - Complete the [journal justification](#) AND
  - Submit with supporting documents to [ORA EFM Operations](#) between **July 1 and July 8, 2024**.
  - For specific questions, contact the [EFM accountant](#).

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# FISCAL YEAR END FUNDING ROLLOVER PROCESS IN UCPATH

- [CRU announced](#) the funding rollover process is scheduled to be run at the end of June 2024.

## Funding Blackout

- The funding rollover process will involve a blackout period. This means all GL initiators and GL approvers cannot enter, update, submit or approve funding transactions in UCPATH. Communications will be sent notifying UCLA of the blackout period and when that blackout period is no longer in effect.
- Departments are being asked to **ensure all funding** has been submitted for approval and is **approved no later than 6/20/2024** so that the funding rollover program will copy the funding to the new fiscal year.
- Additional information on Funding Rollover Process can be found here: [Funding Rollover Process in UCPATH \(ucla.edu\)](#)

# QUESTIONS?

## Contact Information

EFM Website

<https://efm.research.ucla.edu/>

Val Gomez

Phone: (310)794-0103

Email: [valeria.Gomez@research.ucla.edu](mailto:valeria.Gomez@research.ucla.edu)



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# ASCEND 2.0

06/13/2024

# AGENDA

- FAU Project and Source Fields
- Appropriation of Firm Fixed Rate Awards

# FAU PROJECT AND SOURCE FIELDS

Mapping

FAU

Location

Account

Cost  
Center

Fund

Sub

Object

Project

Source

Currently, in FAU “**Project**” and “**Source**” are available for **departmental discretionary use** as **user-entered text fields**



POETAF  
(PPM)

Project

Organization

Expenditure  
Type

Task

Award

Funding  
Source



In POETAF, **user-entered text fields for discretionary use** are **unavailable**, as Oracle does not offer this functionality

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## PROJECT AND SOURCE IN FAU: BUSINESS SCENARIO ANALYSIS

Lack of user-entered text fields for discretionary use in Oracle will be a **significant change**. The Grants Team worked through the steps outlined below to **develop business solutions** where possible; however, there will be cases in which **some of the information you are currently tracking using the FAU cannot be tracked using POETAF**.

### Completed Steps

- Gather business scenarios** from Departments and EFM (**39** business scenarios received!)
- Assign Grants Team resources** from UCLA and Deloitte
- Review each case** and **categorize** into groups
- Review findings at **Research Advisory Committee (RAC)**

### Next Steps

- Communicate** to campus at **Research Administration Forum**

More information can be found in the [March](#) and [April](#) 2023 RAF presentations

## PROJECT AND SOURCE IN FAU: BUSINESS SCENARIO GROUPINGS

The Grants team **reviewed** each case and **categorized** them into groupings

Category	Count	Example
Track budget and expenses by location, person, event, or vendor	21	<ul style="list-style-type: none"><li>• Indicate the requestor for a purchase</li><li>• Group travel expenses by a specific traveler</li><li>• Indicate the quarter and year of an event</li></ul>
Segregate UCPath Payroll by Individual	4	<ul style="list-style-type: none"><li>• Split out lump sum payroll expenses, such as GAEL or TIF, by person</li></ul>
Aid with departmental reconciliation by providing additional detail	3	<ul style="list-style-type: none"><li>• Simplify the process of locating a specific expense when reconciling</li></ul>
Record departmental specific information such as notes	2	<ul style="list-style-type: none"><li>• Use Project code as a notes section</li><li>• Assign a 4-digit code to make it simple for departmental reviewers to differentiate between types of research funds</li></ul>
Track expenses by sub-task on a single award	2	<ul style="list-style-type: none"><li>• Track spending on various specific aim 1, 2 and 3</li></ul>
One off cases	7	<ul style="list-style-type: none"><li>• Track cost share expenses</li><li>• Indicate fabrication number</li><li>• Provide further detail on an expense than object code (ex. glassware, gloves, pipettes) for lab supplies</li></ul>
<b>TOTAL</b>	<b>39</b>	

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# MAINTAINING PROJECT/SOURCE DATA ORACLE

The **Chart of Accounts**, referring to both CoA and POETAF, is used to **record transactions** in the **financial system of record**. Industry standard for ERP Chart of Accounts is to **exclude free form fields**, as the **intent** of the Chart of Accounts is to **gather data** in a **systematic way** to **run reports**.





**Transition to Oracle and Research Finance in PPM is an opportunity to think about the need for maintaining this data:**

1. Is the detail captured in FAU Project and Source fields required by the sponsor for invoicing and/or reporting?
2. Is the level of reconciliation being completed needed to meet UCLA policy and procedures (e.g., Policy 910)?




# DATA ADDRESSED IN PPM

Research Finance in PPM will provide detail through features and processes to assist with **tracking expenses** as required to satisfy **sponsor terms and conditions**.

## ADDRESSED IN PPM

-  **Cost share** and **fabrication** expenses will be segregated in separate projects for their designated purpose and the fabrication number will be added as demographic data on the project
-  **UCPath payroll detail** will pull into PPM
-  Grouping **expenses by sponsor's detailed line items, subtasks, or program** for invoicing and financial reporting will be achieved through separate projects
-  **Expenditure item date** can be used to determine the **budget year** for a multi year award where annual reporting is required

## NOT ADDRESSED IN PPM

-  Reporting from **source systems** should be used to gather additional details regarding the expense such as traveler name, event date, requestor of purchase
-  Recording of notes should be done **offline**
-  **Reconciliation** can be achieved through looking at **other fields** of the transaction that post to PPM such as amount, expenditure item date, and expenditure type

# FIRM FIXED RATE AWARD APPROPRIATION

The way in which **Firm Fixed Rate** awards are appropriated will **change** with the implementation of Research Finance in PPM

Changes are needed to the process for appropriating Firm Fixed Rate awards to meet the requirements of Research Finance in PPM. Awards for all payment bases will be handled consistently.

## Current State

- Award is **not appropriated** upon award **execution**; appropriation occurs when **payments** are **received**
- Process for award appropriation **differs** based on **payment bases**

## Future State

- Award is **appropriated** based on **estimated award amount** from Award Snapshot upon award execution
- Process for award appropriation **consistent** across **payment bases**

Section I: Award Summary			
Principal Investigator:	Dr. Bruin	Fund Number:	12345
Sponsor:	Novartis	Sponsor Award Number:	Dr. Bruin_01
Administering Unit:	MEDICINE-DR. BRUINS DEPARTMENT	Prime Sponsor:	N/A
Project Title:	A Phase 3, Randomized, Double-Blind, Clinical Trial...		
Current Budget Period:	01/01/2024 - 12/31/2025		
Project Period:	01/01/2024 - 12/31/2025		
	<ul style="list-style-type: none"><li>• See Section VIII for Other Investigators</li><li>• For a History of Actions on this award, refer to the Award Snapshot Attachment</li></ul>		
		Current Action:	New
		Funds Awarded this Action:	\$500,000
		Total Funds Awarded to Date:	\$500,000

# CONTACT INFORMATION

**KATIE CADLE**

[kcadle@research.ucla.edu](mailto:kcadle@research.ucla.edu)

**ASCEND 2.0 RESEARCH WEBSITE**

<https://ascend.ucla.edu/research/overview>

# June 2024 Research Administration Forum Q&A

## Contents

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## Human Research Protection Program

### **Q1: What is the YouTube channel for BruinIRB?**

A1: It's where we house all of our training videos/recordings. You can find it here: <https://www.youtube.com/@OHRPP>

## Contract and Grant Administration

### **Q1: Do you know if DOD will also use the common forms?**

A1: Yes, please see the presentation.

## Ascend 2.0

### **Q1: Are you saying that when we run payroll reports, they will contain salary, benefits, TIF, and GAEL all in one place? Instead of the current state where we can only see salary and benefits?**

A1: We plan to bring transactions at the detail level from UCPath (e.g. salary, benefits, fee remission, GAEL) into Research Finance in PPM rather than summarizing the transactions as they appear on the General Ledger (GL) today. This is possible because the transaction detail exists in UCPath.

### **Q2: It is just unfortunate not to have these nice features for future generations. All data to be reported is generated at department level, we have to remember. Recon is done at department level, etc., without these good features, the job is getting a little clumsier.**

A2: We understand the lack of user entered text fields for departmental discretionary use is a significant change. Unfortunately, this is a limitation with most ERP systems, including Oracle Financial Cloud. The Grant team was able to identify alternative business solutions to meet the needs of sponsor terms and conditions and UCLA policies.

### **Q3: What if the level of detailed captured in FAU project & source is required for PI oversight/management of the overall project in an effective way? These PI requested reporting mechanisms don't seem to require additional projects to be created (otherwise it might exponentially increase the # of projects). Would we then need to create full financial reporting batches for each project? I'm not as familiar with other source systems, ex. Concur, but are there user-friendly reporting capabilities in all those source systems?**

A3: Please reach out to the UCLA Grant team to discuss this case further. We are interested to learn more about details required for PI oversight/management that are not required by sponsor terms and conditions or by UCLA policies. In regards to source system reporting capabilities, I will share with the larger Ascend team the need to have user-friendly reporting capabilities in various source systems (e.g. Concur, BruinBuy Plus).

**Q4: The major business use of project and source code is for projections, which are included on financial statements for Faculty. The generation of financial statements and reviewing these with Faculty is a defined requirement in P910. Are you saying the stance is that because the term "projection" is not explicitly defined in P910 that there is no plan to address this essential business need in the design of the financial system? And that the current mechanisms that facilitate this (project source) are being sunset requiring administrators to create new manual processes?**

A4: The Ascend team is looking into ways to address the departmental need for projections. More information will be shared as information is available.

**Q5: Fund managers (the people reviewing and reconciling) don't use the source systems, so in order now to reconcile those expenses, we have to manually ask our purchasers to log in and provide that information to us.**

A5: Thank you for this feedback in that some fund managers may not have access to source systems to access this level of data. We will share this with the larger Ascend team to assess solutions for fund managers to be able to access the data they need in the source systems.

**Q6: This presentation on project code makes sense for C&G fund in the new system, but we need useful tracking mechanism in sales and service funds in lieu of project code per vendor we provide the services to. We use that for our reconciliation. Is there any other presentation that relates to S&S outside of RAF sessions?**

A6: The information shared today only applies to Research Finance in PPM the subledger that houses the financial activity for contract and grants. Sales and Service funds are not part of PPM and instead are managed directly within the GL using the CoA. More information can be found on the [Ascend website](#) regarding the fields available in the CoA.

**Q7: It is very unfortunate to hear that depts will no longer have a field to use for notes. This has been very crucial for customized reporting needed between managers and fund managers. This makes it difficult for us to identify and memorize chart strings if a faculty has a large research portfolio.**

A7: We understand the lack of user entered text fields for departmental discretionary use is a significant change. Unfortunately, this is a limitation with most ERP systems, including Oracle Financial Cloud.

**Q8: Can we go back to seeing salary based on the employee end date? Prior to UCPATH, we could use the code in the system as F (Fixed) and that would encumber on the ledger. Will this be an option?**

A8: In general, similar to current state, UCPath payroll will not be encumbered within Research Finance in PPM. Please feel free to reach out to the Grant team if you have more specific questions.

**Q9: I think the Q&A period would benefit from the full questions being read, instead of providing a summary to the presenter to answer.**

A9: Thank you for sharing this feedback and we will keep this in mind for future sessions.

**Q10: Are there any changes to clinical trial appropriations in the award synopsis?**

A10: There are no changes to the awarded amounts for clinical trials reported in the award snapshot. The change is that the awarded amount from the award snapshot will now be appropriated within the financial system at the time of award execution.

**Q11: Just want to say that is very difficult to manage the CTs and other FFP awards when we appropriate the estimated award, as our actual award can be much less, so it requires us to create a shadow system to determine our true earned appropriation.**

A11: We understand the challenge this poses as the awarded amount in the snapshot is a maximum estimate and may not reflect the award amount received. As reports are being developed, we will keep in mind the need to have a simple and transparent way for departments and PIs to compare the payments received (awarded amount) to expenditures.

**Q12: I thought that customizable values such as Project and Source codes were not able to be setup in Oracle, which is why they weren't being implemented into PPM. However, it sounds like the CoA has the flex field to utilize similar coding. Is it the decision of the Ascend team that the way we are utilizing project/source codes are not following GAAP?**

A12: It is correct that free form text fields are not available within the CoA or POETAF and this is a limitation within Oracle Financials Cloud. To address this limitation, the Grants team reviewed scenarios received from campus and ORA and developed alternative business solutions for cases where tracking of expenses is required by sponsor terms and conditions. More information regarding the various fields available in the CoA are available on the [Ascend website](#).