



# Research Administration Forum

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December 12, 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*
- **Research Policy and Compliance**
  - DURC & PEPP Policy – *Jennifer Klahn*
- **Contract and Grant Administration**
  - NIH Forms I – *Kathy Kawamura*
  - Sponsor Updates – *Tracey Fraser*
- **Extramural Fund Management**
  - New Procedure for Financial Closeout of Sponsored Projects – *Yoon Lee*
  - Impact of Effort Report Certification – *Katie Cadle*

# **United States Government Policy for Oversight of Dual Use Research of Concern and Pathogens with Enhanced Pandemic Potential**

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December 12, 2024

Jennifer Klahn, MA, CPIA  
Director – Research Safety & Animal Welfare  
Institutional Contact for Dual Use Research

# Agenda

- Definitions
- What's New
- What's Changed
- Implementation



# Definitions

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- **Dual Use Research of Concern (DURC)**
  - Life Sciences research that, based on current understanding, can be reasonably anticipated to provide knowledge, information, products, or technologies that could be misapplied to do harm with no, or only minor, modification to pose a significant threat with potential consequences to public health and safety, agricultural crops and other plants, animals, the environment, materiel, or national security.
- **Pathogen with Enhanced Pandemic Potential (PEPP)**
  - A type of pathogen with pandemic potential (PPP)\* resulting from experiments that enhance a pathogen's transmissibility or virulence, or disrupt the effectiveness of pre-existing immunity, regardless of its progenitor agent, such that it may pose a significant threat to public health, the capacity of health systems to function, or national security.
- **Institutional Review Entity (IRE)**
  - Committee responsible for executing institutional oversight responsibilities described in the USG Policy (e.g., risk-benefit assessment, risk mitigation plan, continued oversight)

# What's New: USG Policy on DURC & PEPP (May 2024)



Acknowledges that research with biological agents and toxins is essential to scientific advancements that improve health and safety of the public, ag crops, animals, and the environment.

Establishes unified federal oversight framework for federally funded research on biological agents and toxins that, when enhanced, may pose risks to public health or national security.

Supersedes 2012, 2014, and 2015 policies on oversight of dual use research of concern and potential pandemic pathogens.

Complements existing federal regulation, including Select Agent regulations.

Effective date = May 6, 2025

# What's Changed: USG Policy Scope

## CURRENT POLICY (2014)

- Covers life sciences research with 15 named agents/toxins and 7 categories of research
- IRE required to assess whether research that uses one or more of the DURC Agents also produces, aims to produce, or is reasonably anticipated to produce one or more of the Experimental Effects of Concern.

## NEW POLICY (2024)

- Divides research into two categories
- Category 1 covers ~90 agents and toxins (all SA/ST, RG4, and many RG3 agents) + nine (9) categories of experiments
- Category 2 involves or is reasonably anticipated to result in a PPP + four (4) experimental outcomes or actions

# What's Changed: Process

- Everything starts with the PI
- When preparing proposal to federal funding agency, PI evaluates whether research may fall under Category 1 or Category 2
  - PI self-assessment tool will be available
  - Certification of institutional compliance required with proposal submission
- If FFA is considering funding, agency notifies UCLA, prompting IRE review
  - Research is considered within the scope of Category 1 or Category 2:
    - IRE performs risk-benefit assessment, develops draft risk mitigation plan (RMP)
    - FFA must review risk-benefit assessment and approve RMP
    - PI submits annual or semiannual progress reports to FFA (frequency based on Category)
  - Research not within the scope of Category 1 or 2 → inform FFA, PI monitor research for changes
- We are expected to oversee research that does not receive federal funding

# Implementation

Effective Date: May 6, 2024

- UCOP revision to systemwide policy on Dual Use Research of Concern
- UCLA revision to Policy 995 (DURC)
- RPC website + CITI training updates
- Coordination with OCGA for institutional certification (EPASS updates?)
- PI education
- PI self-assessment form
- Updates to IBC online system SafetyNet
- Committee review combined with IBC process

# Any Questions?

Jennifer Klahn  
Director, Research Safety & Animal Welfare  
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# NIH Forms I

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December 12, 2024

## Overview of Major NIH Form Changes

[Changes Affecting Extramural Applications & Review for Application Due Dates on or After January 25, 2025  
NOT-OD-25-035.html](#)

### NIH Forms I – Changes to Support Other Initiatives

Simplified Review (Change in scoring/evaluation)

Fellowships – Reference Letter Submission (required ORCID linkage Fellowship / Career Development PD/PI)

### Upcoming Initiatives (May 25<sup>th</sup>)

Common Forms (ScienCV – Bio & C&P)

<https://grants.nih.gov/policy-and-compliance/changes-coming-2025/common-forms-for-biosketch>

- Applicants and recipients **must not** use Common Forms for application due dates and report submission dates **on or before May 24, 2025**.
- Applicants and recipients **must** use Common Forms for application due dates and report submission dates **on or after May 25, 2025**.

## Why Are the Forms Changing, Again?

### **Research Project Grants (Rs)**

- Simplified Review of Research Project Grants
  - Goal: “better facilitate the mission of scientific peer review – identification of the strongest, highest-impact research”

### **Fellowship Applications (Fs)**

- Concerns: “mentor reputational and career stage bias, how information within applications is utilized to assess candidates, and a burdensome application for both candidates and reviewers”
- Revision to Application & Review Process: (1) the review criteria used to evaluate fellowship applications and (2) the fellowship supplemental section of the Public Health Service (PHS) SF 424

### **Institutional Training Grants (T15, T32, T34, T35, T37, T90/R90, TL1, TL4, D43, D71, U2R, K12, KL2)**

- Broader outreach activities to foster awareness of research training opportunities for potential trainees from all backgrounds, including individuals from underrepresented groups,
- Targeted recruitment activities to diversify training program applicant pools, and
- Increased mentorship opportunities to facilitate trainee success (see Re-envisioning NIH Supported Postdoctoral Training; UNITE Listening Sessions)

## NIH Forms I Detailed Changes

### [NIH Forms I Guidelines](#)

#### **PHS 398 Cover Page Supplement Form**

- Updated "Change of Investigator/Change of Organization" Section label.

#### **PHS 398 Research Training Plan Form**

- Added new item 3. Recruitment Plan to Enhance Diversity in the "Training Program Plan" Section. Moved instructions for the Recruitment Plan to Enhance Diversity from the 2. Program Plan to the new item 3. Updated instructions for the 2. Program Plan throughout.
- Updated instructions for the "Program Overview" section of the 7. Progress Report (for Renewal Applications) and added instructions for Renewal Applications to the 5. Plan for Instruction in Methods for Enhancing Reproducibility.
- Renumbered form fields.

#### **PHS Assignment Request Form**

- Reduced data entry redundancy on the form by removing the "Funding Opportunity Number" and "Funding Opportunity Title" fields.
- Reordered "List individuals who should not review your application and why" and "Identify scientific areas of expertise needed to review your application" fields.

#### **PHS Fellowship Supplemental Form**

- Renamed "Candidate Section" (formerly "Fellowship Applicant Section") and item 2. Goals, Preparedness, and Potential (formerly 2. Applicant's Background and Goals for Fellowship Training). Updated instructions. Renamed "Candidate Section" (formerly "Fellowship Applicant Section") and item 2. Goals, Preparedness, and Potential (formerly 2. Applicant's Background and Goals for Fellowship Training). Updated instructions.
- Streamlined and Consolidated items in the "Research Training Plan" Section and removed the former 5. Respective Contributions and 6. Selection of Sponsor and Organization. Relabeled items within section and updated instructions as follows:
  - Training Activities and Timeline
  - Research Training Project Specific Aims
  - Research Training Project Strategy
- Streamlined and Consolidated items in the former "Sponsor(s), Collaborator(s), and Consultant(s) Section" and "Organizational Environment and Commitment to Training Section" and combined under the "Commitment to Candidate, Mentoring, and Training Environment" Section and removed the former 9. Sponsor and Co-Sponsor Statements and 11. Description of Organizational Environment and Commitment to Training. Relabeled items within section and updated instructions as follows:
  - Sponsor(s) Commitment
  - Letters of Support from Collaborators, Contributors and Consultants
  - Description of Candidate's Contribution to Program Goals.
- Updated 26, Childcare Costs to reflect changes in amount of childcare cost support available and new eligibility for F99 awards.
- Renumbered form fields

## Simplified Review of Research Project Grants

Research Project Grants

R01, R03, R15, R16, R21, R33, R34, R36, R61, RC1, RC2, RC4, RF1, RL1, RL2, U01, U34, U3R, UA5, UC1, UC2, UC4, UF1, UG3, UH2, UH3, UH5, (including the following phased awards: R21/R33, UH2/UH3, UG3/UH3, R61/R33)

- Simplified Review of Research Project Grants
  - Goal: “better facilitate the mission of scientific peer review – identification of the strongest, highest-impact research”
  - [FAQs \(Simplifying Review\)](#)
  - [NOT-OD-24-010](#)



### Five regulatory criteria reorganized into three factors

**For due dates before Jan 25, 2025**

(all considered in overall impact score)

- **Significance** - scored
- **Investigator(s)** - scored
- **Innovation** - scored
- **Approach** - scored
- **Environment** - scored

**For due dates on/after Jan 25, 2025**

- **Factor 1 : Importance of the Research**
  - Significance, Innovation
  - Scored 1 - 9
- **Factor 2 : Rigor and Feasibility**
  - Approach (also includes Inclusion and Clinical Trial (CT) Study Timeline )
  - Scored 1 - 9
- **Factor 3 : Expertise and Resources**
  - Investigators, Environment
  - Evaluated as appropriate or gaps identified; gaps require explanation
  - Considered in overall impact; no individual score

## Reference Letters

- <https://grants.nih.gov/grants-process/write-application/advice-on-application-sections/reference-letters>
- [Instructions for Fellowship Candidate Referees](#)
- [Instructions for Mentored Research Career Development Award Candidate Referees](#)

submission and will be held and later linked to the appropriate application once they are received at NIH.

You will be requested to enter the following information on-line at the time of submission:

**Referee Information:**

- Referee First Name (Required)
- Referee Last Name (Required)
- Referee MI Name (Not Required)

**Fellowship Candidate Information:**

Name of Fellow (First & Last Name as shown in the eRA Commons): \_\_\_\_\_

Fellow's eRA Commons Username: \_\_\_\_\_

Opportunity Number: \_\_\_\_\_

The fellowship candidate indicated above is applying for an individual fellowship award. The purpose of this award is to provide support to promising candidates with the potential to develop the skills necessary to conduct health-related research in NIH (and where relevant, AHRQ) mission critical research areas that prepare them for productive careers within the biomedical research workforce.

The purpose of this letter is to help the committee to understand the candidate's preparedness and likelihood for success in the proposed research training plan and defined career path. In two pages or less (PDF format), describe the qualities and potential of the fellowship candidate for the research training for which support is being requested (predoctoral, postdoctoral, or senior fellow). Referees should consider including the following information about the candidate:

- **Examples of personal characteristics** (for example, skills, abilities, traits, attitudes) that are likely to contribute most significantly to further advancement in the candidate's defined career path. Take into consideration relevant indicators for success, such as scientific curiosity, resourcefulness, and persistence.
- **Areas for development** to improve the candidate's prospects of transitioning into a productive career in the biomedical research workforce. Areas may include the following skills: technical (e.g., new techniques or technical methods, quantitative or computational approaches), operational (e.g., practices that promote rigorous, reproducible, and responsible research) or professional (e.g., management, leadership, communication, teamwork). Indicate whether the proposed training plan will address these areas and contribute to the candidate's development and attainment of the stated career goals.
- **An overall assessment** of the candidate's preparedness and likelihood for success in the proposed research training plan. Provide examples, such as scientific or intellectual contributions, that highlight the likelihood of achieving the stated goals.

Referees may provide any additional, related comments that they believe will help reviewers evaluate the merit of the fellow's application.

**Submitting Reference Letters**

Please insert the name of the fellowship candidate at the top of the letter. Also, be sure to include your name and title in the letter.

Letters must be submitted directly to the eRA Commons at:  
<https://public.era.nih.gov/commonsplus/public/reference/submitReferenceLetter.era>

Watch a demo on [Submitting Reference Letters through eRA Commons](#).

Reference Letters are due by the application receipt deadline date but may be submitted any time after the funding opportunity opens. Reference Letters can be submitted before the grant application

## Quick Points

- 2 page max
- Must be in PDF Format
- Submission of letter through NIH eCommons

(<https://public.era.nih.gov/commonsplus/public/reference/submitReferenceLetter.era>)

Referee is not required to have a Commons login to provide Reference Letters

Must provide Fellowship Candidate Information

Fellowship (PD/PI) NIH Common User ID

PD/PI Last Name as it appears in NIH eCommons

Funding Opportunity Number (RFA)

Do NOT add "digital signature" (DocuSign)



## PDF Tips

<http://grants.nih.gov/grants/how-to-apply-application-guide/format-and-write/format-attachments.htm>.

# NIH

Applicability: Changes Based upon **Application DUE DATES**

<https://grants.nih.gov/grants-process/submit/submission-policies/standard-due-dates>

## AIDS and AIDS-Related Application Due Dates

Activity Codes	Program Description	Cycle I Due Date	Cycle II Due Date	Cycle III Due Date
<div style="border: 1px solid red; padding: 5px;">                     All Activity Codes Cited Above  <i>new, renewal, resubmission, revision</i> </div>	<p><b>AIDS and AIDS-Related Applications</b></p> <p>*Effective. Sept 5, 2015 - N/A for SBIR/STTR Applications using Standard Due Dates</p> <p>NOTE: See Key Dates section of funding opportunity to determine if AIDS dates apply.</p>	May 7	September 7	January 7

**NIH Forms H**

### NIH Submission Policies

Continuous Submission

NIH Late Application Submission Policy (NOT-OD-15-039)

# NIH

## Applicability: Changes Based upon **Application DUE DATES**

<https://grants.nih.gov/grants-process/submit/submission-policies/standard-due-dates>

<p><b>P Series</b> <i>All - new, renewal, resubmission, revisions</i></p>	<p><b>Program Project Grants and Center Grants</b></p> <p>NOTE: Applicants should check with the relevant Institute or Center (IC), since some do not accept P series applications for all three receipt/review/award cycles.</p>	January 25	May 25	September 25
<p>R18, U18 R25 <i>All - new, renewal, resubmission, revision</i></p>	<p><b>Research Demonstration Education Projects</b></p>	January 25	May 25	September 25
<p><b>T Series</b>  D Series <i>All - new, renewal, resubmission, revision</i></p>	<p><b>Institutional National Research Service Awards Other Training Grants</b></p> <p>NOTE: Applicants should check with the relevant Institute or Center (IC), since some do not accept T series applications for all three receipt/review/award cycles.</p>	January 25	May 25	September 25
<p>C06/UC6 <i>All - new, renewal, resubmission, revision</i></p>	<p><b>Construction Grants</b></p>	January 25	May 25	September 25
<p>G07, G08, G11, G12, G13, G20, R24, S06, S11, S21, S22, SC1, SC2, SC3, UG1, U10, U19, U24, U2C, U41, U42, U45, U54, U56 <i>All - new, renewal, resubmission, revision</i></p>	<p><b>Other Activity Codes</b></p>	January 25	May 25	September 25

**NIH Forms I**

Am I using the correct NIH Form?

<https://grants.nih.gov/grants-process/submit/submission-policies/standard-due-dates>

## Grants.gov

GRANTS.GOV™  
FIND. APPLY. SUCCEED.™

HOME | LEARN GRANTS | SEARCH GRANTS | **APPLICANTS** | GRANTORS | SYSTEM-TO-SYSTEM | FORMS | CONNECT | SUPPORT

GRANTS.GOV > Applicants > Apply Now Using Workspace

### APPLY NOW USING WORKSPACE

If you know the Funding Opportunity Number or the Opportunity Package ID for which you would like to create a Workspace, please enter it below. Otherwise, go to [Search Grants](#) to search open Opportunities.

Please enter Opportunity information:

Funding Opportunity Number: **PA-20-185**

Opportunity Package ID:

- Proposal Management
- Permissions
- Electronic Submission**
- Proposal History
- Export

## S2S

### Create Grants.gov Proposal...

20-185 [Filter] [Find More] [Show All] [Download Opportunities]

25 Page 1 of 1

Opportunity Number	Title	Comp. ID	Comp. Title	Agency
<b>PA-20-185</b>	NIH Research Project Grant (Parent R01 Clinic	FORMS-H	Use for due dates on or be	National Institutes of

- Proposal Management
- Permissions
- Electronic Submission**
- Proposal History
- Export

KEK - R01 Feb5 2024

### Electronic Submission

#### Opportunity Details

Opportunity	NIH Research Project Grant (Parent R01 Clinical Trial Not Allowed)
Opportunity Number	PA-20-185
Package ID	PKG00277412
Competition ID	FORMS-H
Competition Title	Use for due dates on or before January 24, 2025
CFDA #	
CFDA Description	
Offering Agency	National Institutes of Health
Agency Contact	eRA Service Desk Monday to Friday 7 am to 8 pm ET <a href="http://grants.nih.gov/support/">http://grants.nih.gov/support/</a>
Opening Date	2022-10-26
Closing Date	2025-01-24
Schema	<a href="https://apply07.grants.gov/apply/opportunities/schemas/applicant/PKG00277412.xsd">https://apply07.grants.gov/apply/opportunities/schemas/applicant/PKG00277412.xsd</a>
Instructions	<a href="https://apply07.grants.gov/apply/opportunities/instructions/PKG00277412-instructions.pdf">https://apply07.grants.gov/apply/opportunities/instructions/PKG00277412-instructions.pdf</a>

NIH eCommons Validations

**Errors/Warnings for Prior eSubmissions** Close Tab

**GRANT14319242 : 12-10-2024 08:00:32 PM**

Type	Form Name	Validation Message
<b>Warning</b>	GLOBALVALIDATION	Grant application form update underway (<a href="http://grants.nih.gov/grants/guide/notice-files/NOT-OD-24-086.html" target="_blank">NOT-OD-24-086</a>). Use the form package with <span style="border: 1px solid green; padding: 2px;">Competition ID "FORMS-H" for applications to a due dates on or before Jan 24, 2025</span> and <span style="border: 1px solid red; padding: 2px;">Competition ID "FORMS-I" for due dates on or after Jan 25, 2025</span> . If you have confirmed the correct forms are in use, no additional action is needed. (000.51)

**Which Forms do I use for NIH R Incoming Subgrants (UCLA is the sub to another institution)?**

☺ It depends.... What is the NIH Application Due Date?

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# Any Questions?

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



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# OFFICE OF CONTRACT & GRANT ADMINISTRATION UPDATES

DECEMBER 2024

RESEARCH ADMINISTRATION FORUM

TRACEY FRASER, SENIOR DIRECTOR, OCGA

**UCLA** Research  
Administration

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# RESEARCH SECURITY REQUIREMENTS: IMPACT ON CONTRACTS & GRANTS



**DIGITAL PERSISTENT IDENTIFIER**  
ORCID iD



**COMMON FORMS**  
Standardizing Disclosure Requirements



**OTHER UPDATES**  
SciENCv  
Agency Specific Risk Assessments  
Research Security Training



**AGREEMENT TERMS**  
Potentially challenging T&C

# WHAT IS RESEARCH SECURITY?

**Safeguarding** the research enterprise **against the misappropriation of research and development** to the detriment of national or economic security, related violations of research integrity, and foreign government interference

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NSPM 33 [definition](#)

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# MANDATORY DIGITAL PERSISTENT IDENTIFIER (DPI)

Preferred DPI is ORCID iD, a free, life-long, unique, 16-digit identifier



## ORCID ID

Federal Sponsors currently strongly recommend ORCID iD  
Mandatory for at least NIH & NSF from May 2025



## BENEFITS INCLUDE

Reliably; connects a researcher with their works, awards, and affiliations

Alleviates mistaken identity

Researcher owns and controls their record, managing what information is connected and how it is shared

Saves the researcher time – “enter once, reuse often”

Improves recognition for the researcher and their research and increases discoverability of an individual's research outputs



## REGISTER NOW TO PREVENT DELAYS

Please encourage PIs to register now to prevent potential delays with proposal submissions when it does become mandatory

**COMMON FORMS  
INCLUDING  
BIOSKETCH AND  
CURRENT AND  
PENDING (OTHER)  
SUPPORT WILL  
REQUIRE A DPI**

**NSPM 33**

# COMMON DISCLOSURE FORMS

## NSF / NASA

Already Required

## NIH

Required from May 25, 2025

Until then use [NIH Other](#)

[Support](#) and [Biosketch](#) forms

## DOD/DOE

Implementing soon (May 1<sup>st</sup> 2025?)

Check NOFOs now

Resources:

[Biographical Sketch](#)

[Current and Pending \(Other\) Support Common Form](#)

[Disclosure Table \(May 2024\)](#)

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# DISCLOSURE REMINDERS

## Covered Individuals

- Definition may vary depending on the sponsor / NOFO (watch out for [NASA](#) and [DOE](#))
- Occasionally expanded definition of could include graduate students, postdocs, maybe even consultants

## Bio-sketch

- Must include academic, professional, or institutional appointments and positions, whether or not remuneration is received, and, whether full-time, part-time, or voluntary ([NSPM 33 Definitions](#))
- Current or pending participation in, or applications to, programs sponsored by foreign governments, instrumentalities, or entities, including foreign government sponsored talent recruitment programs

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## COMMON FORM BIOSKETCH CERTIFICATION

*I certify that the information provided is current, accurate, and complete. This includes but is not limited to information related to domestic and foreign appointments and positions.*

*I also certify that, at the time of submission, I am not a party to a [malign foreign talent recruitment program](#).*

*Misrepresentations and/or omissions may be subject to prosecution and liability pursuant to, but not limited to, 18 U.S.C. §§ 287, 1001, 1031 and 31 U.S.C. §§ 3729-3733 and 3802.*

*Signature:*

*Date:*

# DISCLOSURE REMINDERS: CURRENT & PENDING (OTHER) SUPPORT

Active and Pending Awards



## DO INCLUDE

- ✓ Pending proposals for funding supporting a PI's research endeavors, including proposals submitted through another entity
- ✓ Current and pending awards in support of research activities, including awards received through another entity or made directly to the individual
- ✓ Startup packages from organizations outside of UCLA
- ✓ Startup companies based on non-organization-licensed Intellectual Property
- ✓ Travel supported/paid by an entity other than UCLA to perform research with an associated time commitment
- ✓ Current and pending participation in, or applications to, programs sponsored by foreign government sponsored talent recruitment program
- ✓ Consulting activities where:
  - Activity will require the investigator to perform research, or
  - Activity does not involve performing research, but is related to the individual's research portfolio and may have the ability to impact funding, alter time or effort commitments, or otherwise impact scientific integrity, or
  - Contract requires the investigator to conceal or withhold confidential financial information or other ties between the investigator to the entity



## DO NOT INCLUDE

- ✗ Training awards
- ✗ Prizes
- ✗ Startup packages provided by UCLA

[Common Forms Disclosure Table](#) (May 2024)

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## COMMON FORM CURRENT & PENDING (OTHER) SUPPORT CERTIFICATION

*I certify that the information provided is current, accurate, and complete. This includes, but is not limited to, information related to current, pending, and other support (both foreign and domestic) as defined in 42 U.S.C. §6605.*

*I also certify that, at the time of submission, I am not a party in a [malign foreign talent recruitment program](#).*

*Misrepresentations and/or omissions may be subject to prosecution and liability pursuant to, but not limited to, 18 U.S.C. §§ 287, 1001, 1031 and 31 U.S.C. §§ 3729-3733 and 3802.*

Signature:

Date:

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## OTHER UPDATES

### SciENcv

- Mandatory now for NSF
- Mandatory for NIH from May 25, 2025
  - UCLA confirmed as a tester for SciENcv

### MFTRP Certs

- **Covered Individual Certs**
  - Already required for NSF, NASA and some incoming subawards
  - NIH from May 25, 2025
  - DOD / DOE , Others coming soon
  - An annual MFTRP certification will be required
    - Goal to move from a manual to an automated process in 2025
- **Institutional Certs**
  - Certify that information on MFTRPs has been made available to the covered individuals
  - During transition to mandatory research security (MFTRP) training for covered individuals, if an institutional cert is required, OCGA is providing MFTRP information to, and collecting additional certifications from, the covered individuals

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## OTHER UPDATES: RESEARCH SECURITY TRAINING



### Why is research security training required?

Required by NSPM-33 'to safeguard our research ecosystem'

CHIPS & Science Act of 2022 codifies the requirement for research security training



### When will it be required?

Already included in some NOFOs / awards

Will become mandatory during 2025 for many Federal sponsors



### Who is required to take it?

Covered individuals listed on the application for a R&D award

(Remember: sponsors / NOFOs may have different definitions of covered individual)

Institution will certify annually that these individuals have completed research security training

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## OTHER UPDATES: RESEARCH SECURITY TRAINING

Currently manual certifications, but move to a more formal process in 2025

From May 1, 2025, DOE will require verification that training has been completed by all covered individuals at proposal stage

- NSF hosted [training modules](#) (NSF,NIH, DOE and DOD co-funded)
  - Four sessions (each 60-minute)
- UCOP Research Security Training [Modules](#) (being updated to meet Federal requirements– updates available in the New Year)

## RESEARCH SECURITY RISK MITIGATION REVIEWS

Many Federal sponsors now use information included in the Biosketch and Current & Pending (Other) Support reports, as well as information from other sources, to assess if disclosures are complete and to flag associations, funding or collaborations that might increase the research security risk

Some sponsors have published their risk matrices including [NIH](#); [NSF](#); [DoD](#); [DOE](#)

In addition, in some circumstances, a [UCOP mandated](#) Internal Enhanced Review and Approval Process is required:

- Country of Concern (Qatar, Saudi Arabia, UAE, China, Iran, Russia & North Korea) AND emerging Technology
- Flag early to allow for extra review time

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# AGREEMENT TERMS: POTENTIALLY CHALLENGING TERMS AND CONDITIONS

1

## Cybersecurity T&Cs

- CUI / FISMA / CMMC – requiring high security environment
- Data breach reporting
- Cybersecurity review deliverables

2

Citizenship restrictions – reporting/ approvals/ prohibitions

3

Far reaching confidentiality clauses / Right to publish / Approvals to publish / Fundamental research challenges

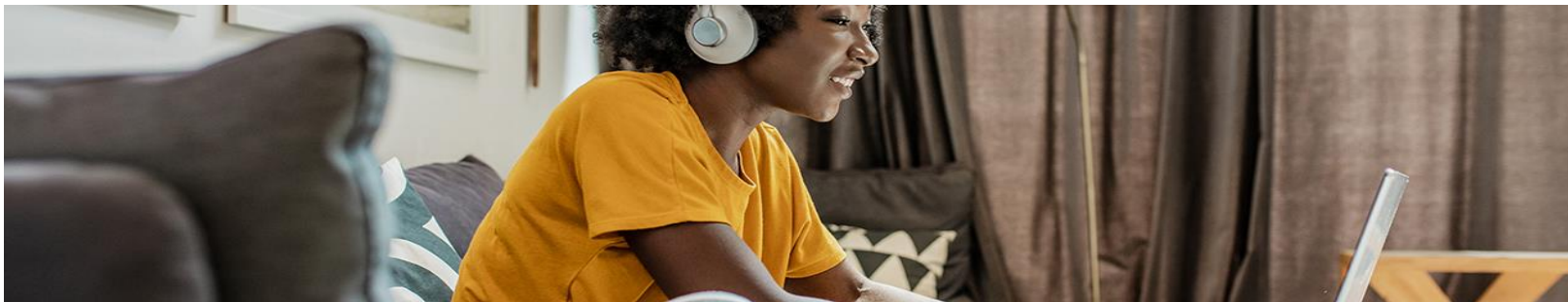
4

Reporting of covered individual personal international travel in advance of taking the travel (some Army grants)

# CLOSING THOUGHTS

Take extra care in listing a lot of individuals in proposals as Senior Key Personnel (SKP)

There will increasingly be extra administrative burden on SKP (covered individuals) including reporting, certifications, disclosures, prior approvals, research security training, etc.



## 2025 OCGA Monthly Training

### Preparing & Submitting a Proposal for OCGA Review

January 15, 2025

### S2S Grants Basics

February 19, 2025

### Preparing an NIH Multiproject Application in NIH ASSIST

March 19, 2025

### Budgets 101

April 16, 2024

### Completing the EPASS

May 21, 2025

### NSF Research.gov Basics

June 18, 2025

### Post-Submission/Pre-Award Requirements

July 16, 2025

### Award Processing

August 20, 2025

### S2S Grants Basics

September 17, 2025

### Requesting New and Amendment Subawards

October 15, 2025

### Completing the EPASS

November 19, 2025

[Register for OCGA Monthly Training](#)

*Separate registration for each session is required*



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# EXTRAMURAL FUND MANAGEMENT

DECEMBER 12, 2024

# AGENDA

- New Procedure for Financial Closeout of Sponsored Projects
- Impact of Effort Report Certification



# NEW PROCEDURE FOR FINANCIAL CLOSEOUT OF SPONSORED PROJECTS

*Yoon Lee*

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# OVERVIEW

- **Kickoff meeting with the campus workgroup was held on November 21<sup>st</sup>.**
  - A great turnout: 18 participants from the departments (out of 20) and 5 EFM staff.
  - Introduced the team, the background and goals of the initiative.
  - Presented key areas for improvement in the current procedures and future objectives in these areas.
- **The 2<sup>nd</sup> meeting with the campus workgroup was held on December 9<sup>th</sup>.**
  - Gathered department feedback on the current challenges and brainstormed how to achieve future objectives EFM presented at the kickoff meeting.
  - This will help planning future discussions for January through March next year.
- **Bi-weekly meetings in January through March 2025**
  - The workgroup will continue to work on developing the new fund closeout procedure.
- **Campus feedback is welcome and appreciated.**
  - Even if you are not in the workgroup, email your ideas to Yoon Lee, [yoony.lee@research.ucla.edu](mailto:yoony.lee@research.ucla.edu)

# GOALS FOR DEVELOPING THE NEW PROCEDURE

## COMPLIANCE

To improve compliance with federal requirements, other sponsor's policies and UCLA policies.



Compliance



Efficiency

## EFFICIENCY

To gain efficiency and reduce error rates by minimizing manual expense adjustments outside Financial System in finalizing expenses and closing the fund.

## COST RECOVERY

To ensure a full recovery of costs incurred for the project by posting expenses timely to the general ledger.



Cost Recovery



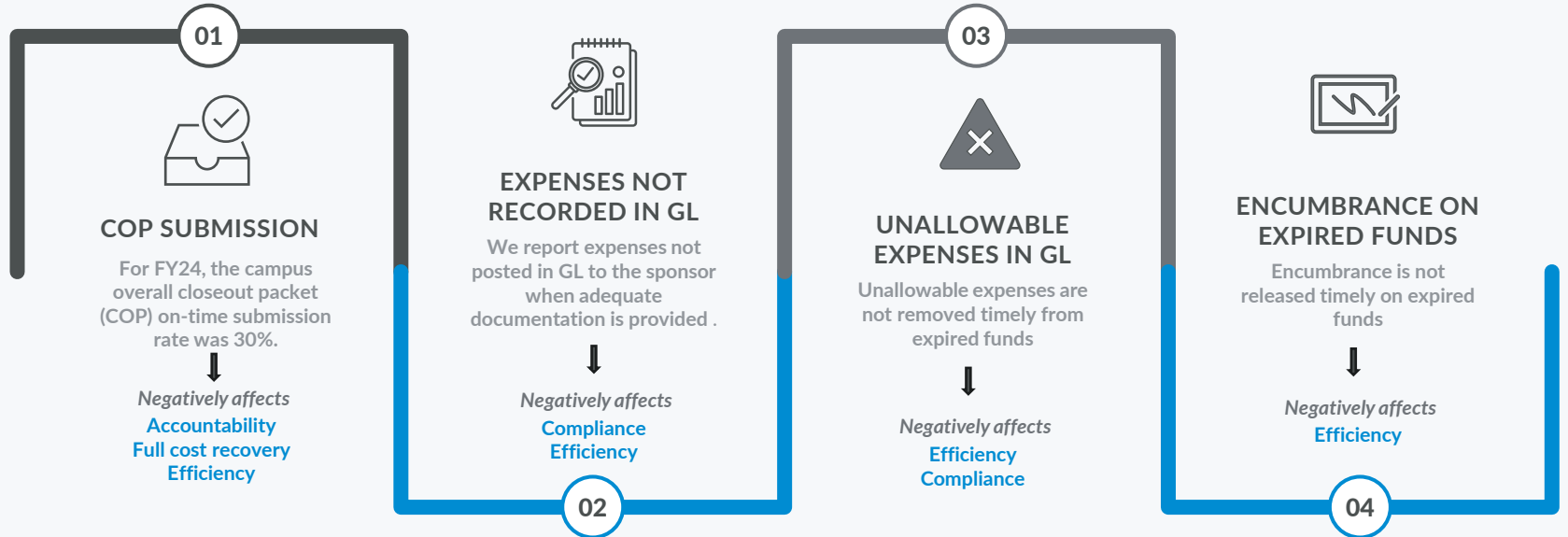
Accountability

## ACCOUNTABILITY

To clearly define responsibility of each role that takes part in closing the project fund to promote collaboration and keep all parties accountable.

# CURRENT PROCESS: AREAS FOR IMPROVEMENT

4 key areas for improvement identified: Efficiency must be improved to support University's compliance with on-time submission of all financial deliverables.



**01** **02** Affects the steps to **finalize the total expenses**

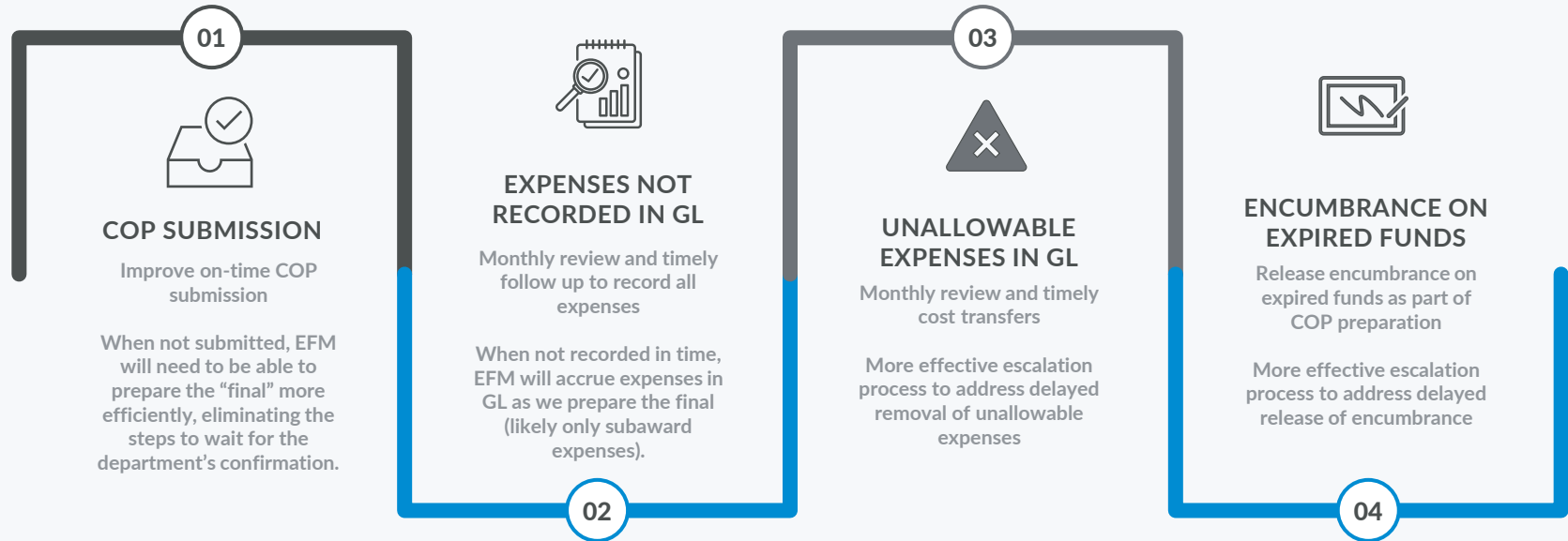
UCLA submitted 16,423 financial deliverables during FY24. Our on-time submission rate to the sponsor for interim and **final** are 94% and **79%** respectively for FY24

**03** **04** Affects the steps to **close the expired fund**

As of 12/11/24, we have 8,102 open funds. 5,644 are active, 764 have expired within the last 120 days, and **1,694** funds expired more than 120 days ago

# FUTURE PROCESS OBJECTIVES

- Objectives for each of the 4 key areas identified for improvement
- Discussion starting with **federal awards** (a closeout packet and the final financial deliverable (“Final”) due 90 days and 120 days respectively after the fund end date).

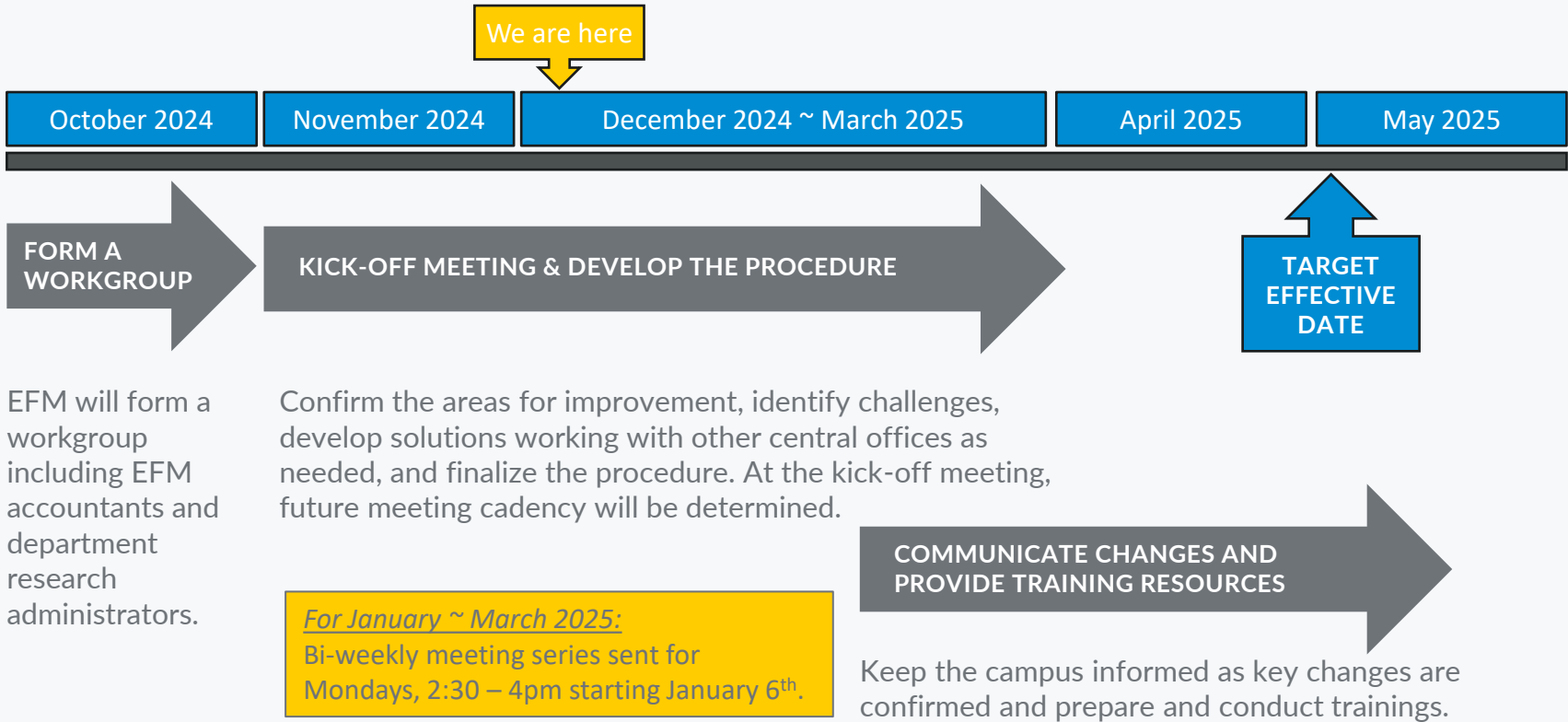


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# REMINDERS

- **Monthly reconciliation throughout the award project period**
  - [“UCLA Policy 910: Management of Sponsored Projects”](#) requires monthly reconciliation of the sponsor project funds.
  - Confirm all last month expenses on the project funds are allowable to the project and remove expenses not applicable to the project if any.
- **Act upon receipt of fund expiration notifications**
  - EFM sends fund expiration notifications 90 days, 30 days prior to the fund end date and on the day of expiration.
  - Review expenses more closely to determine allowability and completeness of project expenses and complete necessary cost transfers.
  - Start preparing a closeout packet.
- **Submit a closeout packet on time**
  - EFM sends a closeout packet reminder 15 days prior to the closeout packet due date.
  - Finalize the closeout packet, obtain the PI’s certification and submit it to EFM.

# TIMELINE





# IMPACT OF EFFORT REPORT CERTIFICATION

*Katie Cadle*

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# IMPACT OF EFFORT REPORTING CERTIFICATION

The following areas impact Effort Report certification and highlight the importance of outstanding Effort Reports



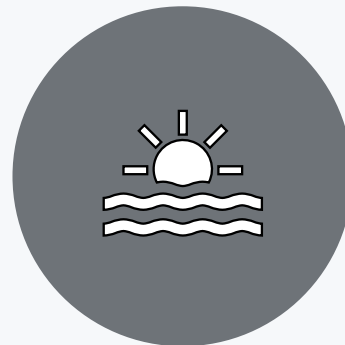
## INDIRECT COST RATE PROPOSAL

UCLA proposal to Cognizant Agency in **Summer 2025** includes mandatory and voluntary committed cost share.



## DIRECT RETRO TOOL DISCONTINUATION

Tool will discontinue in **July 2025** impacting ability to transfer impacted payroll through UCPATH.



## ERS SUNSET

ERS will sunset after implementation of Huron ECC. ECC certification go live in **October 2025**.

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# COST SHARE IN INDIRECT COST RATE **PROPOSAL**

UCLA is in the process of preparing the next Indirect Cost Rate (IDC) proposal to be submitted to our Cognizant Agency (DHHS) in Summer 2025



## UNIFORM GUIDANCE [CFR 200: APPENDIX III](#)

Establishes guidance for identifying and calculating Indirect Costs (IDC) for Higher Education Institutions including [negotiation](#) with our Cognizant Agency (DHHS).



## COST SHARING IN IDC PROPOSAL

UCLA must incorporate [mandatory and voluntary committed cost sharing](#) into research base when calculating Indirect Cost (IDC) rate for proposals.



## COST SHARE IN ERS

As UCLA does not track cost share associated with C&G awards on the ledger, best alternative is incorporating [Cost Share Percentage in ERS](#) into this calculation.



## IMPORTANCE OF ACCURATE COST SHARE IN EFFORT REPORTS

Capturing all cost share in Effort Reports will support accurate calculation of IDC rate, which will be used for the next 5 years.

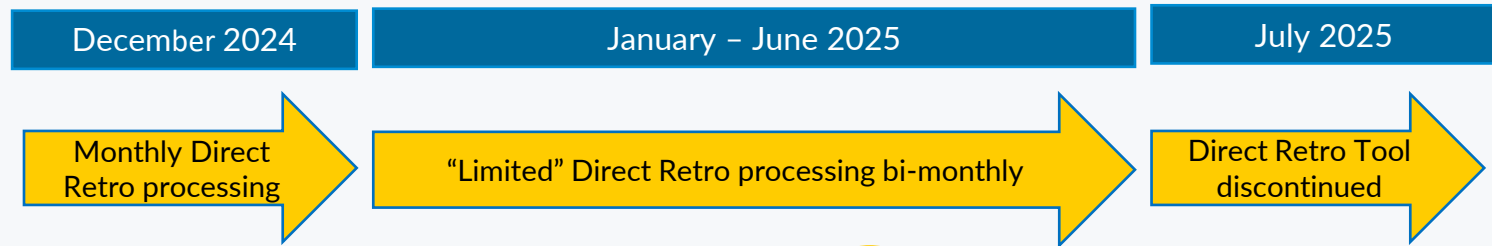


## NEXT STEPS FOR DEPARTMENT

[Review](#) and [add mandatory and voluntary committed cost share](#) in effort reports and work with PI's to [certify](#) these reports. Focus on reports impacting FY23-24 first.

# DIRECT RETRO TOOL DISCONTINUATION

The Direct Retro Tool in UCPATH will be **discontinued in July 2025**. After this date, if a payroll transfer is needed it must be processed through a financial journal. See [August](#) and [November](#) 2024 RAF for more details on process and types of transactions allowed.



## IMPACT

- Financial journals, **bypassing the payroll sub-ledger** will need to be processed to move expenses off C&G funds.
- **Inaccurate information** will be reported in Effort Reporting System (ERS).
- **Manual reconciliation** of payroll required.
- Departments will need to **update effort reports manually** in ERS to account for manual adjustments and **submit certified report to EFM**.



## NEXT STEPS FOR DEPARTMENT

- **Review earnings** older than October 3, 2021, and earnings previously transferred by direct retro now.
- **Process all direct retros** as soon as possible.
- **Review effort reports** in ERS and work with PI to **certify** reports.
- UCPATH will publish direct retro processing schedule soon.

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# ERS SUNSET

As shared in [February](#) and [August](#) 2024 RAFs, a project is underway to replace ERS with the Employee Compensation Compliance (ECC). Certification go live in ECC will occur in October 2025. As part of the implementation project, ERS will sunset.

## CONVERSION APPROACH

- At go live, data will be loaded to ECC on a **going forward basis**.
- All effort reports generated in ERS **will not convert** to ECC.
- Effort reports in ERS **should be certified** prior to ERS sunset.
- More details will be shared on timeline as they become available.



## NEXT STEPS FOR DEPARTMENT

- **Review effort reports** in ERS and work with PI to **certify** reports.
- Focus on **recent reports** first working backwards.
- Address **open effort reports now**.

# KEY TAKEAWAYS



**EFFORT REPORTING IS A FEDERAL REQUIREMENT**



**ENSURE MANDATORY AND VOLUNTARY COMMITTED **COST SHARE** IS RECORDED IN EFFORT REPORTS**



**ADDRESS OPEN REPORTS NOW TO REDUCE IMPACTS OF DIRECT RETRO TOOL DISCONTINUATION AND ERS SUNSET**

## CERTIFICATION METRICS

As of December 12<sup>th</sup>, there are **24,022** open effort reports  
Data available on [ORA Online Resource Center](#)

Academic Year	Fall		Winter		Spring		Summer	
	Cert. %	Open Reports	Cert. %	Open Reports	Cert. %	Open Reports	Cert. %	Open Reports
2023-2024	65%	1,982	65%	2,046	17%	4,832	17%	4,711
2022-2023	86%	762	85%	811	74%	1,523	74%	1,555
2021-2022	91%	478	91%	456	89%	596	89%	633
2020-2021	94%	294	94%	263	92%	412	91%	499
2019-2020	94%	269	94%	270	94%	266	94%	299
2018-2019	96%	221	96%	198	94%	307	94%	296
2017-2018	99%	3	99%	2	99%	15	98%	6
2016-2017	100%	0	100%	0	99%	3	99%	4
2015-2016	99%	2	100%	0	99%	1	99%	1
2014-2015	100%	0	100%	0	99%	2	99%	2
2013-2014	99%	1	100%	0	100%	0	100%	0
2012-2013	100%	0	100%	0	100%	0	99%	1
<b>Total</b>		<b>4,012</b>		<b>4,046</b>		<b>7,957</b>		<b>8,007</b>

SPRING AND SUMMER 2024 EFFORT REPORTING  
DEADLINE

*Katie Cadle*

# SPRING AND SUMMER 2024 EFFORT REPORTING DEADLINE

Effort Reports for Spring and Summer 2024 were released in October 2024

[Certify effort reports by deadline of 01/28/25](#)

Reporting Period	Non-Academic & 11/12 Academics	9/12 Academics	Certification Due Date
Spring 2024	April 2024 – June 2024	March 2024 – June 2024	January 28, 2025
Summer 2024	July 2024 – September 2024	June 2024 – September 2024	January 28, 2025

As of 12/12/24:

Reporting Period	Certification Percentage	Open	Certified
Spring 2024	17%	4,832	1,035
Summer 2024	17%	4,711	1,002

[Address open effort reports now](#), your future self will thank you!

# QUESTIONS?

## Contact Information

### EFM Website

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

### Yoon Lee

Phone: (310) 794-0375

Email: [yoan.lee@research.ucla.edu](mailto:yoan.lee@research.ucla.edu)

### ERS Helpdesk

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

### Katie Cadle

Phone: (310)794-0223

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

# December 2024 Research Administration Forum Q&A

## Research Policy and Compliance

**Q1: Will PI-initiated research or non-federal funds research follow the same RMP restrictions at UCLA, and if so will the PI self-assessment tool be available outside of the FFA application process?**

A1: Great question. Yes, we plan to use more or less the same process for PI-initiated / non-FF research, with the difference being that there won't be a proposal process involving the feds. All of the agents and research that would fall under the new policy are already subject to IBC review, so when a PI submits for IBC approval, we can initiate the self-assessment for Cat 1/2 if this hasn't already been done. I should have mentioned that we also plan to reach out to the ~45 researchers who currently have IBC approval for research that might fall under the policy.

## Contract and Grant Administration

**Q1: Can ORA send a formal announcement re: the ORCID ID requirement in May 2025 with some helpful instructions (i.e. who to contact if they run into technical issues with registration, etc.) and impacts to proposal submissions? This will aid in our department conversations with our PIs.**

A1: Yes, we will do that in the New Year and again closer to the mandatory implementation date.

**Q2: Will there be a database for OCGA/depts to check if PIs have completed their research security training? This would be helpful to know during the beginning stages of the proposal preparation process.**

A2: We expect that the training modules tracking will happen in the UCLA Learning Management Module. We are hoping the new Research Security Office will take the lead on figuring out the details of the implementation.

## Extramural Fund Management

**Q1: When is the new closeout procedure anticipated to go live?**

A1: Target effective date is May 2025