
UCLA Policy 910: Management of Sponsored Projects

Issuing Officer: Vice Chancellor - Research
Responsible Dept: Office of Research Administration
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Supersedes: UCLA Policy 910, dated 11/1/1999

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I. REFERENCES

1. University of California Contract and Grant Manual, Chapters 2 and 10;
2. UCLA Policy 900 - Principal Investigator Eligibility;
3. UCLA Delegation of Authority 250.10 - To Solicit, Accept and/or Execute Certain Extramural Grants and Contracts;
4. Office of Management and Budget Circular No. A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations;
5. Office of Management and Budget Circular No. A-21, Cost Principles for Educational Institutions;
6. UCLA Office of Contract and Grant Administration Web site - <http://www.research.ucla.edu/ocga/>.

II. DEFINITIONS

Award: Financial or other support for a specific project being conducted under a Contract, Grant or Cooperative Agreement or gift.

Contract: A written agreement under which the University conducts research, training, public service or other services. Specific obligations are generally imposed on all parties to the Contract and milestones and/or deliverables are often required.

Cooperative Agreement: A version of a Grant in which the sponsor participates in the project along with University personnel.

Grant: A written agreement under which the University conducts research, training, public service or other services. Deliverables other than technical or financial reports are generally not required.

Principal Investigator (PI): A UCLA employee (normally an academic appointee) who has primary responsibility for the scientific and technical conduct, reporting, fiscal and programmatic administration of a Sponsored Project.

Sponsored Project: A specific research, training, public service project or other program that receives support from external sponsors and/or University programs under a Contract, Grant, Cooperative Agreement or Subaward. Support may be in the form of funding, equipment or other material contributions.

Subaward: Agreement that transfers to another organization a portion of the substantive work being conducted under a Contract, Grant or Cooperative Agreement.

III. BACKGROUND

This policy describes the shared responsibility for the administration of Awards accepted as Contracts, Grants, Cooperative Agreements or Subawards at UCLA. Through designated officials with delegated authority, UCLA solicits and accepts Awards on behalf of The Regents of the University of California from a variety of organizations for organized research, instruction and training, and other sponsored activities (i.e., public service, community service, health service projects, etc.). Federal, state and local governments, industrial and commercial concerns, institutions of higher education, private foundations and other non-profit organizations, provide extramural funding. In addition, the University of California also issues Awards through a variety of funding programs.

Awards take on the appearance of Contract, Grants or Cooperative Agreements when they include requirements such as a specified period of performance or a specific scope of work to be followed or other conditions or obligations required of the University to fulfill the terms of the Award. Awards without restrictions generally constitute gifts.

IV. STATEMENT

With the submission of proposals and the acceptance of Awards, UCLA agrees to provide technical or scientific expertise, and to manage each Sponsored Project in compliance with various fiscal and administrative regulations. Specific individuals and select administrative support units share responsibility for managing Sponsored Projects.

- A. Principal Investigators are responsible for the proposal preparation, acquisition of appropriate approvals (i.e., human subject, animal subject, use of biohazardous materials, etc.) and licenses, scientific and technical conduct and reporting, fiscal and programmatic management of the project, which includes responsibility for any applicable Subawards.
- B. Deans, department chairs and Organized Research Unit (ORU) directors share primary responsibility for the management of Sponsored Projects in their respective units, along with various components of the Office of Research Administration (ORA).
- C. The Vice Chancellor – Research has general oversight responsibility for policy related matters associated with Sponsored Projects. He or she is also responsible for coordinating compliance with federal and other research regulations in areas such as the protection of human and animal research subjects, scientific integrity, conflict of interest, and environment, health and safety.
- D. A number of other units, including Audit and Advisory Services, the Controller's Office, and other departments within Corporate Financial Services, the Office of Insurance and Risk Management, Purchasing, Equipment Management, and the Office for the Protection of Research Subjects, have expertise in varied subject areas and provide a wide spectrum of support services related to the administration of Sponsored Projects.

V. RESPONSIBILITIES

Principal Investigator

It is reasonable and appropriate for the Principal Investigator (PI) to rely on administrative staff for assistance in carrying out responsibilities under a Sponsored Project. However, it is expected that the PI will:

1. Be knowledgeable about appropriate agency and University guidelines and restrictions relative to the budgeting of both direct and indirect costs, proposal preparation, the conduct of organized research, instruction and training, and other sponsored activities, and be willing to comply with such guidelines and restrictions;

2. Secure appropriate federal and campus approvals such as Investigational New Drugs (IND), Investigational Device Exceptions (IDE), human and animal subject approvals and approval to use biohazardous materials and/or recombinant DNA;
3. Comply with the specific terms and conditions of each Award as stated in the Contract, Grant, Cooperative Agreement or Subaward documents and with all administrative requirements, as set forth by the federal government, sponsoring agency and campus policy statements, as applicable;
4. Adhere to specific budget restrictions, ensuring that activities do not begin and expenditures are not incurred prior to the receipt of a fully executed Award unless necessary and authorized advanced approvals have been obtained, and that expenditures do not exceed the total amount of funds obligated;
5. Certify that all costs charged to a Sponsored Project are accurate and specifically benefit the project being charged including the certification of salaries charged to federal Awards using the Personnel Activity Reporting (PAR) system forms;
6. Provide justification and documentation of costs being transferred, if after-the-fact adjustments in the allocation of certified costs become necessary;
7. Comply with the reporting requirements as stated in the Contract, Grant, Cooperative Agreement or Subaward documents, including the submission of periodic and final programmatic reports, financial reports, invention reports and inventory and equipment reports; and
8. Ensure that any subrecipients comply with the terms and conditions of each Award as stated in the Subaward documents and with all administrative requirements, as set forth by the federal government and sponsoring agency, as appropriate.

Department Chair or Organized Research Unit (ORU) Director

Department chairs and ORU directors are responsible for reviewing proposals developed by faculty, in particular to:

1. Ensure the proposed project is consistent with the educational and professional objectives of the school or college;
2. Determine the eligibility of the individual designated as Principal Investigator (PI) or Co-Principal Investigator in accordance with UCLA Policy 900, Principal Investigator Eligibility;
3. Ensure the appropriateness of the effort committed to the project made by UCLA faculty, staff and students;
4. Ensure that appropriate on-campus or off-campus space has been identified and is available for the project;
5. Confirm that support will be provided for the administration of the project;
6. Determine that cost sharing and/or matching fund commitments set forth in the proposal can be met; and
7. Ensure that where appropriate, equipment-screening procedures have been followed.

Once an Award has been made, the department chair or ORU director has continuing responsibility to ensure that administrative staff:

1. Reallocate appropriated funds into the appropriate budget categories;
2. Review and approve financial transactions related to personnel, the purchase of equipment, rebudgeting of funds, or the retention of consultants for consistency with project purposes and the terms and conditions of the Award;

3. Maintain budgetary control through the use of departmental bookkeeping and cost control systems and monthly reconciliation with the general ledger;
4. Provide the PI with accurate and timely information about expenditures; confer with the PI in order to make adjustments as may be necessary to ensure that the general ledger is cleared of any expenses not applicable to the Sponsored Project. Such adjustments may include transferring outstanding liens, transferring items of expense not allowable under that particular Award, and transferring overdrafts to other permissible fund sources;
5. Identify appropriate unrestricted fund sources at the departmental level to cover cost-sharing commitments, overdrafts and/or disallowances that PIs are not able to cover with funds under their jurisdiction; ensure that equipment purchased or acquired under Contracts, Grants, Cooperative Agreements or Subawards are accounted for and/or disposed of in accordance with sponsor and University requirements.

The Office of Extramural Fund Management (EFM) is responsible for the preparation and submission of reports of expenditures. However, the department chair or ORU director is responsible for ensuring that all financial transactions are properly recorded in a timely manner so that the reports of expenditures can be submitted promptly to sponsors.

Deans

Deans are accountable for all Contract, Grant, Cooperative Agreement and Subaward funds administered by units under their control, and for the coordination of all programmatic elements within their school or college including:

1. Review of all proposals to ensure that the proposed project is consistent with the educational and professional objectives of the school or college;
2. Review and approval of requests for PI exceptions;
3. Approval of cost-sharing and/or matching fund commitments contained in proposals; and
4. Identification of appropriate unrestricted fund sources to cover overdrafts and/or disallowances that department chairs within the school or college have not been able to cover with funds under their jurisdiction.

Office of Research Administration – Office of Contract & Grant Administration (OCGA)

As campus officials with delegated authority to submit proposals and accept Awards, OCGA staff:

1. Review, approve, and submit all proposals for organized research, instruction and training, and other sponsored activities to ensure that projects are consistent with Regental and UCLA policy, agency terms and conditions, and application guidelines;
2. Negotiate, execute, and accept Awards that are consistent with Regental and UCLA policy and which contain terms and conditions that minimize administrative burden, and limit exposure to compliance issues;
3. Provide pre- and post-Award consultative service and support to PIs and department staff;
4. Interpret Award terms and conditions and inform PIs, departmental staff and appropriate campus personnel of the requirements and obligations imposed by the sponsor's Award;
5. Review and approve certain post-Award transactions for consistency with Award terms and conditions; and
6. Serve as liaison with sponsors, maintain the University's official file of record, participate in agency site visits and audits, and assist in closeout activities.

Office of Research Administration - Extramural Fund Management (EFM)

EFM staff are responsible for financial management of extramurally supported Contracts, Grants, Cooperative Agreements and Subawards. EFM staff:

1. Set up extramural Awards in the financial system by assigning fund numbers, linking expenditure accounts to funds and appropriating funds;
2. Review and certify expenditures for extramurally funded projects for consistency with sponsor and University policies and Award terms and conditions;
3. Conduct post-audit reviews of selected transfers of payroll and non-payroll expenditures for conformance to agency and University policies and procedures;
4. Prepare and submit invoices and financial reports of expenditures;
5. Obtain adequate and timely reimbursement for Award expenditures from sponsoring agencies;
6. Generate Personal Activity Reporting (PAR) system forms, reviewing signed and completed forms and/or providing assistance to campus departments in completing forms as required under federal regulations;
7. Close out funds, transferring overdrafts and unallowable expenditures or adjusting the budget to clear out unexpended balances after conferring with the PI and departmental/ORU administrative staff;
8. Provide assistance to departments that may be experiencing difficulties in the management of Contract, Grant, Cooperative Agreement or Subaward funds; and
9. Work with Audit and Advisory Services to respond to sponsor audit requests.

Corporate Financial Services – General Accounting

Staff of General Accounting are involved in some aspects of managing funds transferred to UCLA investigators from the UC Office of the President to support Sponsored Projects funded under the University of California (UC) program. The staff:

1. Set up UC Awards in the financial system by assigning account numbers, linking expenditure accounts to funds specified by the UC program and appropriating funds;
2. Prepare and submit claims to the State Controller's Office for the State-related funds;
3. Prepare and submit financial reports as required;
4. Close out funds, transferring overdrafts and unallowable expenditures or adjusting the budget to clear out unexpended balances after conferring with the PI and departmental/ORU administrative staff;
5. Provide assistance to departments that may be experiencing difficulties in the management of Contract, Grant, Cooperative Agreement or Subaward funds; and
6. Work with Audit and Advisory Services to respond to sponsor audit requests.

Office of Research Administration – Office of Intellectual Property Administration (OIPA)

The OIPA staff:

1. Provide advice and counsel to faculty, staff and students regarding their obligations under the University Patent and Copyright policies;
2. Review all new inventions disclosed to the University to determine their commercial value, ownership, and any potential obligations to research sponsors and providers of research materials;
3. Engage patent attorneys and legal counsel to file appropriate intellectual property protections (i.e., patents, copyrights, trade secrets and trademarks);

4. Market inventions to industrial entities capable of furthering the commercialization of inventions;
5. Assist entrepreneurs, investors and management teams to form and launch new start-up companies to further the development and commercialization of early-stage emerging technologies;
6. Negotiate, execute and monitor all licenses of University-owned intellectual property to third parties;
7. Manage all legal expenses related to intellectual property protection and distribute income to inventors and organizational units qualified to receive a share of net revenues;
8. Negotiate, execute and monitor all incoming material transfer agreements; and
9. Ensure that federal, State and private sponsor requirements regarding invention reporting are met.

Issuing Officer

/s/ Roberto Peccei

Vice Chancellor – Research

**Questions concerning this policy or procedure should be referred to
the Responsible Department listed at the top of this document.**
