
UCLA Policy 909: Requirement to Submit Proposals and to Receive Awards for Grants and Contracts through the University

Issuing Officer: Vice Chancellor for Research and Creative Activities
Responsible Dept: Research Policy and Compliance
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I. PURPOSE AND SCOPE

This Policy implements the existing University of California Policy on the “Requirement to Submit Proposals and to Receive Awards for Grants and Contracts Through the University (UC Policy).”

II. DEFINITIONS

For the purposes of this Policy:

Extramural Sponsor refers to an entity external to UCLA (including other UC campuses, locations and units) to which a UCLA employee submits a proposal, or from which it receives an award for a grant, contract or cooperative agreement.

III. POLICY STATEMENT

- A. All UCLA employees who receive any part of their salary through the University, or whose activities use any campus resources or facilities, must submit proposals for extramural support through the authorized University contracts and grants office with resulting awards made to The Regents of the University of California. There are special circumstances that warrant exceptions, as outlined in Section IV.
- B. This Policy *does not apply* to the following:
- Programs where the sponsor’s stated intent in a funding opportunity announcement, or similar published document, is to make a fellowship award directly to a student, postdoctoral fellow, or faculty member.
 - Proposals submitted to Extramural Sponsors by affiliated institutions on behalf of UCLA faculty whose primary appointments are at those affiliated institutions. This includes but is not limited to the Veterans Administration Greater Los Angeles Healthcare System, Cedars Sinai Medical Center, and Harbor-UCLA Medical Center.

- Proposals submitted by the RAND Corporation under the UCLA-RAND MOU for Health Services Research or the UCLA-RAND Center for Law and Public Policy MOU or the Doheny Eye Institute – UCLA Affiliation Agreement.
- C. Newly recruited faculty should make every effort to have extramural support at the institution from which they are moving, transferred to UCLA. If that is not feasible and any work under those contracts or grants will be conducted at UCLA using campus resources and facilities, a subaward should be issued to UCLA that includes the faculty member’s effort on the project. If no work will be done at UCLA and the faculty member will continue to expend effort on the project, an exception to this Policy should be requested.
- D. Faculty who are governed by Academic Personnel Manual chapter 025 (Conflict of Commitment and Outside Activities of Faculty Members) or chapter 671 (Conflict of Commitment and Outside Activities of Health Sciences Compensation Plan Participants) must separately request prior approval to engage in research activities outside the University.

IV. EXCEPTIONS

Exceptions may be granted on a case-by-case basis and under unusual circumstances. In accordance with the UC Policy, when an exception is granted, there must be a clear distinction between service to the University and service to the external party, relevant personnel policies will be followed, the name of the University will not be used by the external party, and in no case will the University assume liability for a third party’s action without the approval of the Regents as required by the Bylaws and Standing Orders of The Regents.

The authority to grant exceptions to the requirement to submit proposals and awards through the University has been delegated to the Vice Chancellor for Research and Creative Activities (UCLA DA 258.03).

UCLA faculty who are also affiliates of the National Bureau of Economic Research (NBER) will need to request exceptions as outlined below. However, they may submit their requests using the UCLA process for a “Streamlined request for approval to submit a proposal for research support through the National Bureau of Economic Research (NBER) under the Policy on the Requirement to Submit Proposals and to Receive Awards Through UC.” See: <https://rpc.research.ucla.edu/wp-content/uploads/nber-streamlined-request-approval.pdf>.

A. Exception Considerations

Prior approval to grant an exception to UCLA Policy 909 will be granted in unusual circumstances and only if, considering the totality of the circumstances, the Vice Chancellor for Research and Creative Activities determines that granting the exception is in the best interest of the University.

In reviewing requests for exceptions, the Vice Chancellor will consider whether there is a compelling reason to grant an exception, the degree of overlap in and/or conflicts with research and/or responsibilities between the proposed activity and the requestor’s University duties and responsibilities, the adequacy of the separation between the requestor’s University obligations and the proposed extramural activities, the risk that the proposed activity may result in a violation of University policy, and the justifications for the request.

B. Postdoctoral Scholar Exception Requests

Requests for exceptions submitted by Postdoctoral Scholars are typically considered only when the postdoctoral appointment is nearing conclusion. Postdoctoral Scholars who wish to conduct research outside UCLA and also continue to hold a part-time postdoctoral appointment on campus will need to request prior approval for an exception as outlined in this Policy. They will also need separate approval from the Graduate Division to reduce their Postdoctoral appointment from full-time to part-time.

C. Exception Restrictions

1. Exceptions cannot be made for H1-B visa holders as changes in work conditions are not permitted.
2. The scope of work for the proposed research *cannot overlap* with research that the individual is conducting at UCLA.
3. Because of effort and conflict of commitment/interest concerns, requests for exceptions submitted by full-time employees may require a reduction in their UCLA effort for the duration of the contract or grant award.

D. Requesting Prior Approval to Submit a Proposal Outside UCLA

Requests for prior approval to submit a proposal or application outside UCLA should be addressed to the Vice Chancellor for Research and Creative Activities and submitted to RPC@research.ucla.edu. All requests for exceptions to the UC Policy must be endorsed by the relevant Department Chair and Dean.

Requests can take the form of a memo or email that includes:

1. A copy of the proposal or, if the proposal has not been finalized, information about the proposed project, the funding agency, performance period, scope of work, budget, the requestor's role, and the anticipated effort on the project;
2. The rationale/justification for the request, including anticipated benefits to the University and reason why the proposal cannot be submitted through UCLA;
3. An explanation of how the investigator will maintain a clear distinction and separation between service to UCLA and service to the organization through which the proposal is to be submitted;
4. Confirmation that the proposed project activity will not interfere with the individual's duties and responsibilities to UCLA;
5. Confirmation that all UCLA policies, including those regarding personnel, research, conflict of interest, conflict of commitment, information security, and intellectual property will be followed; and
6. Confirmation that the University of California and UCLA name and logos will not be used by the external party without prior approval.

E. Determinations after Review of Requests for Prior Approval

After review by the Vice Chancellor, written notification either of a need for additional information or decision to approve or to deny a request will be sent to the requestor. A copy of the approval notification will be shared with the requestor's Chair and Dean, as well as the authorized campus contracts and grants office. If the request was made by a faculty member, a copy will also be sent to the Academic Personnel Office.

Copies of approved or denied request forms will be kept on file in the Office of the Vice Chancellor for Research and Creative Activities.

All research proposals and awards submitted through UCLA *and through any outside organization* must be included on disclosures of "Other Support" or "Current and Pending Support" disclosed to Extramural Sponsors regardless of which entity is responsible for administering the award.

V. REFERENCES

1. UC Policy on the Requirement to Submit Proposals and to Receive Awards for Grants and Contracts through the University;
2. UC Academic Personnel Manual chapter 025: Conflict of Commitment and Outside Activities of Faculty Members;
3. UC Academic Personnel Manual chapter 671: Conflict of Commitment and Outside Activities of Health Sciences Compensation Plan Participant;

4. UCLA Delegation of Authority 258.03: Exceptions to Requirement to Submit Proposals to Receive Awards for Grants and Contracts through the University;
5. UCLA- RAND MOU for Health Services Research (<https://rpc.research.ucla.edu/wp-content/uploads/ucla-rand-mou-2002-09.pdf>);
6. UCLA-RAND Center for Law and Public Policy Memorandum of Understanding (<https://rpc.research.ucla.edu/wp-content/uploads/ucla-rand-mou-2009-09-15.pdf>);
7. Streamlined Request for approval to submit a proposal for research support through the National Bureau of Economic Research (<https://rpc.research.ucla.edu/wp-content/uploads/nber-streamlined-request-approval.pdf>);
8. [UCLA Policy 110](#): Use of the University's Names, Seals, and UCLA Trademarks;
9. UCLA Delegation of Authority 250.14: To Solicit and Accept or Execute Certain Extramural Grants and Contracts.

Issuing Officer

/s/ Roger Wakimoto

**Vice Chancellor for Research and Creative
Activities**

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