

TO: All School of Public Health Faculty

FROM: Linda Rosenstock, Dean
Roshan Bastani, Associate Dean for Research

DATE: January 15, 2002

SUBJECT: Contract and Grant Submissions

This memorandum is in response to requests from faculty and staff for clarification on policies related to contract and grant activities in the School of Public Health. As you are aware, the School is becoming increasingly reliant upon contract and grant support, and especially the funds provided by indirect cost recovery. Therefore, it is important for the Dean's Office to closely monitor the submission of applications. This will assist in long-term planning as well as ensure compliance with University and School policies.

Eligibility to Serve as Principal Investigator: Under current UCLA Policy 900, members of the Academic Senate are automatically eligible to serve as Principal Investigator (PI) or Co-Principal Investigator (Co-PI). For all others within SPH, exceptions are granted on an application-by-application basis. Department Chairs must submit exception requests to the Dean's Office for approval. It is important for individuals who serve as PI's (or Co-PI's) to be aware of University policies and agency regulations. The request for exceptions to policy must address considerations about the commitment of space, access to any specialized equipment, and administrative support or other resources that will be needed throughout the term of the award. UCLA Policy 900 "Principal Investigator Eligibility" can be found at:
http://www.adminvc.ucla.edu/appm/_entry_900.html

SPH faculty are also reminded that all applications for contract and grant support must be submitted to sponsors through the University, as indicated within UC Policy on "Requirement to Submit Proposals and to Receive Awards for Grants and Contracts through the University." A copy of this policy can be found at <http://www.ucop.edu/raohome/cgmemos/95-01.html>.

Requests for Proposals and General Open Solicitations: The Office of Contracts and Grants Administration (OCGA) has requested that researchers who anticipate responding to a call for proposals/applications submit the RFP/RFA along with a brief note or email indicating their intent to apply for the funding opportunity. This advanced notice can be brief. Unless the particular RFA/RFP requires that a letter of intent be submitted to the sponsor, this notification will remain with OCGA and is not considered binding. The notification process will be coordinated through the Dean's office, which can then begin correspondence with the OCGA and other campus units to ensure that the process of application submission goes smoothly and without delay. Such notification is always important but becomes especially so in situations in which a funding agency sets limits on the number of applications that can be submitted by UCLA or a particular academic unit.

Goldenrod Preparation, Review, Approval and Submission: A Goldenrod, the internal University routing and approval document required for all extramural funding submissions, must be completed, reviewed, and approved in advance for any proposal/application being submitted through SPH. The Goldenrod form can be found at the OCGA website, <http://www.research.ucla.edu/sr2/GoldRinfo.htm>. The Goldenrod, along with a complete copy of the application and any other supporting documents, must be submitted to the Dean's office for review and approval. The Dean's Office will require a minimum of 24 hours to complete the review. This review and approval process is not a rubber stamp, since by signing the Goldenrod the Dean agrees that the application is consistent with academic goals, is fiscally sound and that space and other resources will be available as stated in the document. Therefore, if major errors or other issues unacceptable to the Dean are identified, the application will be returned to the PI for revisions, which may put it at risk of not meeting the agency deadline. All Goldenrod submissions must include a copy of the RFP/RFA or open solicitation.

Please note that in addition to the 24 hour turnaround time required by the SPH Dean's Office, OCGA requires three business days to review the final and complete proposal after the SPH Dean's Office has reviewed it. Also note that OCGA will only submit, to the funding agency, those applications that have the prior approval of the Dean's Office.

Electronic Proposal Submission: Proposals/applications submitted electronically must have a paper Goldenrod generated with paper copies of the application printed in the same format as discussed above. These applications are subject to the same policies as hard copy applications.

Budget Review: The Dean's Office is prepared to assist in budget preparation and review. We will provide the optional service of reviewing all budgets prior to the completion of the full proposal and submission of the Goldenrod. This will include the submission of the budget to OCGA for University review and feedback. It is requested that faculty submit a copy of the draft budget to the Dean's Office two weeks in advance of the submission date to ensure a detailed review and the provision of feedback. Budgets submitted one week prior to submission will be reviewed and feedback provided as time permits. Budgets not submitted in advance will be given a cursory review. Please be aware that major errors or other irregularities in budgets may delay or stop the submission of the full application, so an advance budget review is highly recommended.

Budgetary Policies: All budgeted salary amounts in an application/proposal should match the level of effort being provided by all personnel listed on the proposal for the entire 12-month period each year. In-kind salary contributions, matching funds, and other kinds of cost-sharing commitments require the prior approval of the Dean's Office.

Indirect Cost Calculations: Principal Investigators are responsible for submitting proposals that provide for full indirect cost recovery unless a waiver currently exists or an exception is granted. All indirect cost calculations for submitted proposals/applications must be calculated according to University policy unless an official waiver is in place for the specific funding program or agency to which an application is being submitted. Additionally, exception to full indirect costs may be requested on an application-by-application basis through the Dean's office and must be endorsed by the Vice Chancellor for Research prior to submission by the OCGA to the UC Office of the President for approval. However, exceptions will not be routinely approved. Information about indirect cost exceptions is available within the UC Contract and Grant Manual, Chapter 8, section 640. It can be accessed at <http://www.ucop.edu/raohome/cgmanual/chap08.html#8-630>

IRB Approval: All research that utilizes any data collected on or from human subjects requires Institutional Review Board (IRB) approval from the UCLA Office for the Protection of Research Subjects (OPRS) before research can begin. This includes secondary data analyses and other research that may fall into the exempt category. Faculty/investigators are no longer permitted to grant self-exemptions. An application for exemption must be made to OPRS, which will determine whether a particular study meets the exemption criteria. These rules also apply to research conducted by students. Please note that IRB administrative approval is required for each new sponsor and/or any title changes, even if the protocol has been previously approved. This is an expedited procedure, which is required before an account/fund number can be assigned. Forms for IRB approval, including requests for exemption and administrative review, are available at <http://www.oprs.ucla.edu/DEFAULT.htm>.

Please note that NIH has instituted a policy requiring all proposals for contracts and grants for research involving human subjects submitted after October 1, 2000 to certify that all key personnel have received education on the protection of human research subjects. Individuals can complete the training by using a web-based training program that uses some materials available from NIH and some materials specifically developed for UCLA. This program is available at <http://www.training.arc.ucla.edu/> Training and testing may be accomplished on-line and a certificate will be printed out at completion of the training and testing. The certificate(s) of completion for Key Personnel for a project should accompany the proposal when it is sent to OCGA.

We are committed to providing investigators in our school with greater assistance in all aspects of securing and managing extramural funds. The ability to increase extramural funding within the School is an extremely important goal and we hope that the above policies will be a good foundation from which we can expand. Please feel free to speak to the Associate Dean for Research, Roshan Bastani, about any of the items addressed in this memorandum.

cc: Roberto Peccei, Vice Chancellor for Research
Gerald Kominski, Associate Dean for Academic Programs
Diane Porter, Associate Dean for Administration
Department/Center Administrators
Finance Office