What You Need to Know When Submitting an NIH SF424 R&R Grant Application Through the UCLA Office of Contract and Grant Administration (OCGA)

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Objectives

- Learn the basics of working with the UCLA OCGA during the National Institutes of Health (NIH) application process

- Learn the basics of an NIH Standard Form 424 Research and Related application (i.e. SF 424 R&R = the electronic NIH proposal)
General Introduction to the UCLA Office of Contract & Grant Administration (OCGA)

Sources of Sponsored Extramural Funding
- Federal (including NIH)
- State
- Local Gov’t (County, City)
- Non-profit organizations
- Foundations
- Industry (not through OCGA)

Types* of Sponsored Projects thru OCGA
- Research
- Training and Career Development
- Public Service
- Other Sponsored Activities

*NIH offers all of these types

Award Instruments
- Grants and Cooperative Agreements
- Contracts
- Subawards and Multi-campus Agreements
- Gifts (not through OCGA)
Why is OCGA Involved?
Hierarchy of Regulations

- Award Terms
- Departmental Policies
- UC and University Policies & Procedures
- Sponsor (NIH) Policies
- Federal Policies and Governmental Law (A-21, A-110, FAR)
Today’s Topic

Life Cycle of an Award –
OCGA Involved

- Start: Identify Funding
- Prepare Application & Submit Application
- Negotiate Award
- Set Up Award
- Perform Work
- Close-out Award
- Generate Payment Requests
- Monitor Project & Manage Funds

Start:
Identify Funding
Internal: Prepare & Submit an Application

It’s a Team Effort per UCLA Procedure 910.1

“Approval and Submission of Contract and Grant Proposals”
Internal:
The Key Team Players

Academic Departments or Organized Research Unit

Principal Investigator(s)
Chairs/Deans
Department administrator/fund manager
Departmental Research Associate (DRA)
Other as Applicable (ex. Mentors, Fiscal Officer, etc.)

Office of Research Administration

Office of Contract and Grant Administration

(OCGA)
Internal:
Prepare & Submit an Application
- Policies & Procedures
Where to start?
UCLA Procedure 910.1: Approval & Submission of Contract & Grant Proposals

- **PI:**
  - Develops and prepares a proposal in accordance with prescribed agency and University policies.
  - Completes internal documents-approvals in accordance with prescribed agency and University policies.
  - Ensures that completed “proposal package,” including the final proposal and all required internal documents, is submitted to OCGA (or DRA) for final review and submission as soon as possible, but at least 5 working days prior to agency deadline.

  **If the 5 “working days” deadline is not met, OCGA cannot accept responsibility for the timely delivery of the proposal to the agency.**

- **Chairs/Deans**
  - Reviews proposal and accompanying documentation with particular attention to items in their authority.

- **OCGA**
  - Reviews proposal and accompanying documentation for compliance with University and sponsor policies.
The “Proposal Package”

=Internal submission documents
and the SF 424 R&R forms in our
System-to-System Application
(Cayuse)
Proposal Package
Internal Submission Documents

1. The “EPASS”

EXTRAMURAL PROPOSAL APPROVAL AND SUBMISSION SUMMARY
2. PHS Conflict of Interest Policy Revised 8/25/11; effective 8/24/12

Federal Law - 42 CFR Part 50, Subpart F, “Responsibility of Applicants for Promoting Objectivity in Research for which Public Health Service (PHS) [including NIH] Funding is Sought…”

---- Third-party interests (not PHS/NIH agency)
2. Statements of Financial Interests (con’t)

- PI and Investigators disclose via UCLA “eDGE” website (See UCLA Procedure 926.)
  - UCLA Personnel with responsibility for design, conduct, or reporting of PHS research must complete eDGE report annually or whenever new interest (PHS Policy)
  - The Policy is applicable to all research activities supported by PHS and other sponsors/programs requiring review consistent with the PHS policy
  - Research Policy and Compliance Office reviews eDGE report to determine if substantive review is required.
  - Reviewed by Conflict of Interest Review Committee (CIRC); outcome reported to NIH

- **Policy 900** explains the categories of UCLA employees eligible to serve as PI (ex. Member of the Academic Senate)
- NIH recognizes only PI (including Multiple PI), no CoPI’s
- Letters of Exception must be submitted for each new proposal, resubmission, or renewal. Department/School approves these “letters” – OCGA retains in file.
NIH/PHS PI Signature Form (UCLA) - REPLACED by PI-signed EPASS

EPASS language complies with the requirements of NIH Notice NOT-OD-06-054 that the PI(s) certifies:

- (1) that the information submitted within the application is true, complete, and accurate to the best of PI’s knowledge; and
- (2) any false, fictitious, or fraudulent statements or claims may subject PI to criminal, civil, or administrative penalties; and
- (3) PI agrees to accept responsibility for the scientific conduct of the project and to provide the required progress reports if a grant is awarded as a result of the application.

---don’t apply if you can’t certify
5. Subjects: Humans & Animals

Subject use must be explained in the application and the use protocol will have to be approved by the time NIH reviews for a pending award (JIT):

- **Institutional Animal Care and Use Committee (IACUC a.k.a. ARC)**
  Animal Welfare Assurance # A3196-01

- **Institutional Review Board (IRB)**
  Federalwide Assurance # FWA00004642
NIH policy allows “Just-in-Time” (JIT) submission of approval for both human subject and animal subject use:

- Application can be marked “pending approval”
- Must submit approvals before award is issued though; NIH will not award without it (except possibly for “delayed onset”)
- i.e. Subject use approval submitted post-proposal but pre-award (i.e. JIT)
- Subject Use Protocol Approval must apply to/denote the proposal being submitted (amend if necessary)
5b. Human Subject Education Certification

- Required for all key personnel involved in human subject research, including any at sub award site(s)

- Collaborative Institutional Training Initiative (CITI) = online education program for UCLA personnel to fulfill requirement

- Confirmation of Certification of Human Subject Education submitted “just-in-time” (JIT) i.e. post-proposal but pre-award

- Certification in UCLA system expires after 3 years and must be renewed before expiration.
6. Other Items in the Proposal Package

- Proposal from consortia (sub) partner (if applicable) – For Internal Use
  - Subrecipient Commitment Form, signed by their Authorized Official (i.e. signed by their OCGA), completed by each subaward – REQUIRED
  - Scope of Work - REQUIRED
  - Budget/Budget Justification prepared by subaward group - REQUIRED

- Specific items required in Funding Opportunity Announcement (FOA)
7. The SF424 Proposal

= System to System (S2S) Cayuse

Grants.gov System-to-System Submission
S2S Cayuse = where you produce your SF424

- S2S is a web-based alternative for preparing, validating, and submitting proposals via Grants.gov that does not require use of PureEdge or Adobe Forms for SF424s

Preparing
Validating
Submitting
Storing

- Campus-wide implementation began in November 2008 and use of S2S Grants for eligible submissions became *mandatory* in January 2009 (see [memo](#) from Vice Chancellor Peccei)
S2S Cayuse

S2S Grants Production Environment:
https://s2sgrants.research.ucla.edu
- The production environment is available for preparation and submission of actual Grants.gov applications and should not be used for training.

S2S Grants Training/Testing Environment:
https://s2sgrantstraining.research.ucla.edu/
- The training environment is available for users to familiarize themselves with the system and/or to conduct training sessions within departments/units.

Departmental Coordinators: are available to assist users with:
- Requesting system access
- Learning to utilize the system
- Providing feedback to the S2S Grants system administrators

ACCESSING THE SYSTEM:
- S2S is available to all researchers and administrators with a UCLA Logon ID. To request access, contact your Departmental Coordinator

S2S Grants List-serv: self subscribe
- http://lists.ucla.edu/cgi-bin/mailman/listinfo/s2sgrants

Help: s2sgrantshelp@research.ucla.edu
- Training Modules: Developing proposals to Grants.gov via S2S
S2S Application Production

- Download/locate the Funding Opportunity Announcement (FOA) in(to) S2S
- Complete SF424 application (administrative and research components)
- Clear all Errors, and check if Warnings need correction
  - **Error**: [Other Project Info 6][NIH] The Abstract (labeled 'Project Summary/Abstract') must be included.
  - **Error**: [Research Plan 2.5][NIH] Research Design and Methods attachment must be included
  - **Warning**: [Other Project Info 8][NIH] In most cases, a Bibliography and References Attachment should be included.
- Upload internal documents (ex. EPASS, etc.) so proposal “package” is complete
- Create a PDF to send to others (ex. mentor) for review, or give others access to view it in S2S
- PI reviews and approves final version before alerting OCGA to review
Notify OCGA that final Error-free proposal package is ready in S2S Cayuse for review and submission at least 5 working days prior to deadline (department may have earlier deadline)

**OCGA (per UCLA Procedure 910.1):**
- Reviews proposal package for compliance with University, campus, and agency requirements
- Determines whether proposal requires administrative corrections. Coordinates any necessary changes with PI/Departmental Administrator(s)
- Electronically signs/submits proposal to the agency
Internal: Why is OCGA Involved in the Application Process

- UCLA DA 250.12 “To Solicit, Accept and/or Execute Certain Extramural Grants and Contracts”

  =

  OCGA has the delegated “authority to solicit, accept and/or execute certain extramural grants and contracts…PIs are not to submit proposals on their own behalf, or make commitments to sponsors that would disregard these procedures.”

  Note: even if the sponsor doesn’t require OCGA signature (electronic or otherwise), UCLA does require it
Submission of NIH SF424 Applications through Grants.gov via S2S (Cayuse)
What is Grants.gov

- Common portal for submission of ~all federal grants
  S2S → Grants.gov → eRA (NIH) Commons

- Grants.gov validates it according to their business rules, and an application can get rejected by Grants.gov.

- Once NIH retrieves the application from Grants.gov to the eRA (NIH) Commons, NIH validates it according to their business rules.

- NIH sends e-notification to PI* and OCGA upon retrieval and validation.

*In case of Multiple PI’s, only the Contact PI receives initial notification.
NIH Validation Process in eRA Commons

- PI should access info about the application in Commons via in e-submission area of Status.
- If an Error, application is essentially rejected and must be corrected before submission deadline. After deadline, no correction window. Late Policy may apply.*
- If Warning(s) only, application is compiled, posted and assigned a Accession # (AN#)
- PI should view the posted application for any transmission problems.
- If PI sees problem, must consult with OCGA.
- If no Errors or transmission problems, do NOTHING.
- [Dr. Adams to discuss Review]
- Now wait for the good news from NIH!!!

*NOT Applicable for RFA’s or FOA’s with specific non-standard deadlines
1. SF424 (R&R) Application Guide for NIH and Other PHS Agencies that incorporate NIH Grants Policy Statement – General


2. Funding Opportunity Announcement (FOA) – Specific - Must respond to a specific FOA, even if it is a basic “Parent” opportunity e.g., PI-initiated R01.

REMEMBER –
Follow the Instructions!!
Start early and leave time for unforeseen problems!

1, 2, 3, 4, 5

Allow time for review and corrections before submission.

Demonstration of S2S Production
https://s2sgrants.research.ucla.edu
Questions?

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OCGA Staff Directory:
[http://www.research.ucla.edu/ocga/ContactUs.htm](http://www.research.ucla.edu/ocga/ContactUs.htm)