

Responsible Stewardship:

Guidance For New Investigators



Office of Research Administration
&
Controller's Office

Responsible stewardship as it specifically relates to extramural funding is multifaceted:

With the submission of proposals and the acceptance of extramurally funded awards, the University agrees not only to provide technical or scientific expertise, but also to manage each award in conformance with various fiscal and administrative regulations. Extramural funds are valuable University resources. In managing these monies, researchers take on these stewardship responsibilities.

This brochure is intended to highlight some of these important stewardship responsibilities while also providing informational references.

Stewardship as used in this brochure refers to the careful and responsible management and use of University resources (e.g. financial, human, time, supplies, equipment, space, etc.). It is a responsibility shared by faculty, staff and students.

UCLA received awards of almost \$700 million in fiscal year 2001/2002, and was the seventh largest recipient of federal support for research in the country. Accordingly, UCLA encourages a broad spectrum of research and creative activity, from basic to applied, across the full range of academic disciplines.

Along with institutional success in conducting research and receiving research funding, comes responsibility. Inside this brochure is guidance about some of the *stewardship* responsibilities that are assumed by Principal Investigators (PIs) and Co-Principal Investigators (Co-PIs).

There are a wide range of stewardship responsibilities associated with the acceptance of sponsored research. These include knowledge at the proposal stage of appropriate agency and University guidelines; governing issues such as publications, patents, proprietary data, consultants, equipment screening and purchases, issuance of subawards to collaborating institutions, recombinant DNA or regulated substances; compliance with specific terms and conditions of each award as stated in the contract or grant documents and with specific reporting requirements of each contract and grant. (See UCLA Policy 910 at <http://www.adminvc.ucla.edu/appm>.) Some of these issues are highlighted below:

Requests For and Acceptance Of Research Funding

All contracts, grants and gifts are subject to conditions, restrictions and review procedures established by the Chancellor, in conformance with University wide policies and procedures. Part of the covenant between research sponsors and the recipient institutions is a requirement that the University comply with a wide range of Federal regulations, and in many cases, sponsor-mandated requirements that may apply to a specific project.

UCLA Policy 910, Management of Sponsored Projects, (see <http://www.adminvc.ucla.edu/appm>), describes the way in which

responsibility for managing these contracts and grants is shared by investigators, department chairs, deans and central administrative units for the management of projects supported by contract and grant funds.

Gifts represent another source of external support that also becomes University resources upon acceptance by the campus. (See UCLA Policy 921 at <http://www.adminvc.ucla.edu/appm>.)

Accountability for Award Expenditures

Financial stewardship permeates many aspects of University life. In addition to conforming with Federal and UC regulations, research projects may be subject as well to sponsor-specific restrictions. For example, under contracts and grants:

- Budgets are developed to ensure recovery of all allowable costs (both direct and indirect) related to research.
- Fund expenditures need to be closely monitored against budget amounts.
- Expenses should be incurred only during the period of performance.
- In some instances, sponsors require that prior permission be sought before funds are rebudgeted. In these instances, only salaries and expenses that are budgeted and approved in the awarded project may be charged to that project unless prior permission to do otherwise has been granted.
- Funds allocated for one research project cannot be used to fund expenses on another project.
- Care should be taken to ensure proper recording and charging of all costs. If unallowable costs are incurred, the sponsor may subsequently disallow those costs.
- Funds committed for cost sharing, including matching funds, must be tracked so they can be accounted for and reported to sponsors.
- Program income associated with contract and grant activities must be accounted for

and reported in conjunction with contract and grant expenditures.

Gift and endowment monies, while not subject to Federal cost principles applicable to contracts and grants, must still be expended in accordance with the terms of the gift and in accordance with University fiscal policies. (See UCLA Financial Policy at <http://www.accounting.ucla.edu>.)

Other Stewardship Considerations:

Conflict of Interest and Conflict of Commitment

Specialized policies address a range of issues related to faculty obligations and duties, the acceptance or offering of gifts, participating in decisions involving intellectual property in which individuals have an ownership interest, and the disclosure of financial interests in private (non-governmental) sponsors or research, or financial interests related to research supported by certain federal agencies or University of California managed programs. Many of these policies are derived from State of California law. Others reflect federal regulations. (See UCLA Policy 150 at <http://www.adminvc.ucla.edu/appm>.)

Disclosures of personal financial interests related to extramural funds must be completed in conjunction with proposals submitted for research support, and acceptance of certain gifts. Positive disclosures are reviewed by a faculty committee and recommendations about proposed action needed to reduce, eliminate or manage the conflict of interest are provided to the Vice Chancellor—Research. (See UCLA Procedures 921.1 and 921.2 at <http://www.adminvc.ucla.edu/appm>.)

Research with Human or Animal Subjects

In order to uphold the highest ethical standards in the conduct of UCLA human research, the University complies with applicable federal regulations, state law, and ethical guidelines to protect human research subjects and maintain the public trust. The University requires that all research, including, biomedical research, classroom research,

surveys and interviews involving human subjects be reviewed by one of the UCLA Institutional Review Boards (IRB) or receive a certified Claim of Exemption from IRB Review from the UCLA Office for Protection of Research Subjects (OPRS). Research for these purposes is defined as systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge. Human subjects are defined by federal regulations as "living individuals" about whom an investigator (whether professional or student) conducting research obtains (1) data through intervention or interaction with the individual, or (2) identifiable private information. This includes all human subject research conducted under the auspices of the University, regardless of funding. (See the UCLA Investigator's Manual for the Protection of Human Subjects at <http://www.oprs.ucla.edu/human/TOC.htm>.) Investigators and key personnel are required to obtain UCLA human research certification from <http://training.arc.ucla.edu> and submit such certification to the IRB with their research application.

To assure the continued maintenance of the highest standards of animal care and use, maintain the public trust, and comply with all federal, State, and local regulations and University policies regarding the use of animals, all research, testing, and teaching activities involving animal subjects must be reviewed and approved by the Chancellor's Animal Research Committee (ARC) prior to the conduct of such activities. Animal subjects are defined as any living or dead vertebrate animal. (See UCLA Chancellor's Animal Research Committee website and <http://www.oprs.ucla.edu/animal> and ARC Policies and Guidelines at <http://www.oprs.ucla.edu/animal/gdlns.htm>.)

Use of Recombinant DNA & Infectious Agents

To ensure that research involving recombinant DNA and infectious agents is done safely and within compliance guidelines, a number of special precautions and safeguards have been put into place. All research at UCLA potentially involving the use

of recombinant DNA molecules and/or other infectious agents is subject to review by the Institutional Biosafety Committee (IBC) in accordance with the review standards contained in the NIH Guidelines. PIs are responsible for determining if their experiments are covered by the NIH Guidelines or if the experiments are exempt. If a PI determines that experiments are covered by these guidelines, they must complete the "Registration Document for Recombinant DNA and/or Infectious Agents" form and submit it to the IBC. (See UCLA Policy 992 at <http://www.adminvc.ucla.edu/appm>).

Intellectual Property

Stewardship of the University's intellectual property rights is an important component of University research. Under the patent acknowledgement agreement, all employees (faculty, students and staff) must disclose and assign all inventions made during their period of employment. If the University, through its Office of Intellectual Property Administration (OIPA), determines that an invention has commercial value, technology transfer professionals will obtain appropriate proprietary protection (patents, copyrights, trade secrets and trademarks) and will attempt to find industrial partners to commercialize the invention. If it is determined to be of minimal commercial value, or if it was made as part of permissible consulting activity, the University may choose to not assert ownership.

Disclosure and management of inventions is extremely important because organizations that sponsor research programs may have a legal claim to rights in inventions arising from internal research. For example, the federal government requires that all federally funded inventions be reported to them, and industrial sponsors usually have a time-limited option to negotiate a license to inventions they sponsor. Failure to adhere to these obligations may create significant legal liability for the University and, in some cases, the investigator. (See <http://www.research.ucla.edu/oipa/faculty.htm>)

For matters concerning:

The General Conduct of Research and Misconduct in Science:

Office of the Vice Chancellor — Research
Vice Chancellor - 310-794-7943

Proposal Submission and Award Acceptance, Extramural Accounting, and Protection of Intellectual Property including Patents, Licenses and Copyrights:

Office of Research Administration
Assoc. Vice Chancellor - 310-794-0558
<http://www.research.ucla.edu/ora>
<http://www.efm.ucla.edu>

Fiscal Responsibility, Petty Cash, Disbursements and Travel:

Office of the Controller
Corporate Financial Services
Asst. Vice Chancellor/Controller
310-794-8686
<http://www.finance.ucla.edu>

Protection of Human Research Subjects and Animal Research Subjects:

Office for the Protection of Research Subjects
Director - 310-825-5344
<http://www.oprs.ucla.edu>

Environmental Health and Safety, Radiation Safety, Recombinant DNA, and Biohazard/Biosafety including Lab Security and Anti-Terrorism:

Office of Environmental Health and Safety
Director - 310-206-6544
<http://www.ehs.ucla.edu>

Conflict of Interest Policies:

Office of Legal Affairs
Campus Counsel -310-825-4042

Purchasing: Purchasing Office
Director -310-794-6027
<http://www.purchasing.ucla.edu>

Equipment Management: Equipment Management Dept. Property Administrator
310-794-6063
<http://www.equipment.ucla.edu>

Gifts: Gift Services
Associate Executive Director—310-794-3422

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