I. PURPOSE & SCOPE

In accordance with the University of California Policy on the Requirement to Submit Proposals and to Receive Awards for Grants and Contracts Through the University and UCLA Policy 9XX, UCLA employees who receive any part of their salary through the University or whose activities use any University resources or facilities must submit their proposals for extramural support through the authorized University contracts and grants office. A UCLA employee may not be included on a proposal, grant application or award submitted outside of the University, unless prior approval for an exception has been granted. The policy does not apply to proposals for subawards that will be issued to UCLA under contracts or grants that are being submitted to research sponsors by other organizations. This Procedure outlines the process to request prior approval for an exception to UCLA Policy 9XX including exception restrictions and requirements and considerations in granting or not granting an exception.

II. DEFINITIONS

For the Purposes of this Procedure:

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. PROCEDURE

A. Exception Restrictions and Requirements

- Exceptions cannot be made for H1-B visas holders because changes in work conditions are not permitted.
- The scope of work for the proposed research cannot overlap with research being conducted at UCLA.
Due to effort and conflict of commitment/interest concerns, requests for exceptions submitted by full-time employees may require a reduction in their UC effort for the duration of the contract or grant award.

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 Procedure. They will also need separate approval from the Graduate Division to reduce their Postdoctoral appointment from full-time to part-time.

C. Exception Considerations

Prior approval to grant an exception to UCLA Policy 9XX 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.

D. Requesting an Exception

Requests for exceptions to submit a proposal or application outside UCLA must be sent to RPC@research.ucla.edu. All exception requests 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.

6. Confirmation that the University of California or UCLA name and logos will not be used by the external party without prior approval (see UCLA Policy 110).

UCLA faculty who are also affiliates of the National Bureau of Economic Research (NBER) will need to request exceptions as outlined in this Procedure. However, they may submit their requests using the UCLA process for a “Streamlined request for approval to submit a proposal for research

E. Determinations after Review
After review by the Vice Chancellor, written notification either of a decision to approve or to deny a request will be sent to the requestor, their Department Chair, and Dean. If upon review the Vice Chancellor feels additional information/clarification is needed, requestors will have an opportunity to provide additional information before a final decision is made. A copy of the approval notification will also be shared with the Academic Personnel Office and the Office of Research Administration.

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

All research proposals and awards submitted through UCLA and through any outside organization by exception 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.

IV. REFERENCES
3. 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 Receive Awards through UC.

Issuing Officer

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.