

UNIVERSITY
OF
CALIFORNIA

Research Grants Program Office

GRANT ADMINISTRATION MANUAL

Effective January 1, 2025

Table of Contents

PREFACE	3
ACRONYMS	4
DEFINITIONS	5
1 ELIGIBILITY REQUIREMENTS & PROCEDURES FOR NOTIFICATION AND FUNDING OF AWARDEES	6
1.1 Pre-funding Administrative Review	6
1.1.1 Additional Requirements For Non-UC Campuses.....	7
1.2 Award Notices and Research Agreements	7
1.2.1 Award Notice.....	7
1.2.2 UC Campuses.....	7
1.2.3 Research Agreements with Institutions other than UC Campuses.....	8
1.3 Proposition 56 (Prop 56)	8
1.4 Distribution of Funds	8
1.4.1 Advance Payment Disbursements for Multi-Year Awards.....	9
1.4.2 Return of Interest.....	9
1.5 General Data Protection Regulation (GDPR)	9
2 MANAGEMENT OF GRANTS	9
2.1 Communication with Research Program Staff	9
2.2 Use of Funds	10
2.2.1 Other Support and PI/Key Personnel Percent Effort	10
2.2.2 Travel.....	11
2.2.3 Equipment and Residual Supplies.....	11
2.2.4 Pooled Expenses.....	12
2.2.5 Monitoring and Payment of Subcontractors.....	12
2.2.6 Cost Share or Project Contributions.....	12
2.2.7 Fraud or Misuse of Funds.....	13
2.2.8 Family and Medical Leave with Pay.....	13
2.3 Grant Monitoring Site Visits	13
3 DIRECT COST BASE AND INDIRECT COST (F&A) RECOVERY	13
3.1 Direct Cost Base for Determining Indirect Cost (F&A) Allocations for Applicable RGPO Awards	13
3.1.1 Allowable Indirect Cost Recovery (F&A) for Primary Grantees and Subcontracts.....	14
3.1.2 Documentation.....	15
3.1.3 Increases in Institutional F&A Rate.....	15
3.1.4 Decreases in Institutional F&A Rate.....	15
4 CHANGES DURING THE AWARD PERIOD	15
4.1 Budget Change Requests	15
4.2 Changes to Key Personnel and Institutions	17
4.2.1 Change of PI or Key Personnel.....	17
4.2.2 Change of Institution.....	17
4.3 Changes to Collaborative Awards	18
4.4 Changes to Career Development Awards	18
4.5 Changes to the Funds Expenditure Timeline	19
4.5.1 Unexpended Funds.....	19
4.5.2 Annual Fiscal Forecast Required for Carry Forward Request.....	19
4.5.3 No Cost Extension (NCE).....	20
4.5.4 Unexpended Funds at Award Termination.....	20
5 ACKNOWLEDGMENT OF SUPPORT	20
6 GRANTEE APPEAL PROCESS	20
7 RESEARCH MISCONDUCT AND CONFLICT OF INTEREST	21
7.1 Research Misconduct & Other Administrative Actions	21
7.2 Conflict of Interest	21
7.3 Disclosure of Violations	22

8	REPORTING REQUIREMENTS	22
8.1	Annual/Final Progress Reports and Annual Fiscal Forecast	23
8.1.1	Annual Fiscal Forecasts	24
8.2	Annual and Final Fiscal Reports	24
8.3	Post-Grant Required Outcomes Reports	24
8.4	Overdue and Delinquent Reports	24
8.5	Document Retention Policy	25
8.6	RGPO Open Access Policy	25

PREFACE

The Research Grants Program Office (RGPO) of the University of California Office of the President (UCOP) hereby releases the 2025 revised edition of its Grant Administration Manual (GAM). The GAM covers the following standing programs:

- California Breast Cancer Research Program (CBCRP)
- California Firefighter Cancer Prevention and Research Program (CFCPRP)
- California HIV/AIDS Research Program (CHRP)
- Climate Action Research Grants
- Tobacco-Related Disease Research Program (TRDRP)
- UC Cancer Research Coordinating Committee (CRCC)*
- UC Multicampus Research Programs and Initiatives (MRPI)*
- UC National Laboratory Fees Research Program (LFRP)*
- Other special initiatives for which UC campuses and UC-affiliated institutions only are eligible*

Additionally, other RGPO-administered funding opportunities also adhere to the policies and procedures outlined in the GAM except as specifically noted in any funding documentation for that opportunity. This manual supersedes all previous editions. The guidelines and procedures set forth in this manual apply to all active RGPO grants, unless specifically noted otherwise in the award documents. For non-UC grantee institutions, the award terms and conditions shall be governed in the following order of precedence: by the signed research Agreement, and then this RGPO Grants Administration Manual. The effective date for this manual, including any changes from previous editions, is **January 1, 2025**.

All Principal Investigators (PIs), Program Directors, institutional administrators, and organizational officials with grant management responsibilities are urged to read this edition carefully and to refer to relevant sections for answers to questions that arise concerning the administration of RGPO grants. The designated institutional official, and/or the approved Applicant PI for the grantee institution, may be required to document compliance with any and all provisions set forth in this manual. The Contracts and Grants (C&G) offices, accounting offices, and PIs will be notified by email when revised editions of this manual are released. In special circumstances, some new policies and procedures may become effective immediately and will be communicated by letter and/or email. Recipients may seek exceptions to the new policy within 90 days of notification, and if the exception is not permitted, they will be allowed to terminate the award if the new terms are found to be unacceptable. Effective January 28, 2021, all active grants are now administered on [SmartSimple](#). Grantees must use current [SmartSimple](#) templates and forms, and all previous forms are no longer permissible on this system.

By acceptance of any RGPO award, the grantee agrees to comply with the guidelines and procedures set forth in this manual and in future applicable editions.

* Collectively these programs are managed under the UC Research Initiatives (UCRI)

ACRONYMS

BCR	Budget Change Request
C&G	Contracts & Grants
CBCRP	California Breast Cancer Research Program
CF CPRP	California Firefighter Cancer Prevention and Research Program
CHRP	California HIV/AIDS Research Program
CRCC	Cancer Research Coordinating Committee
DEA	Drug Enforcement Administration
EU	European Union
F&A	Facilities & Administrative Costs
GAM	Grant Administration Manual
GDPR	General Data Protection Regulation
HHS	Health and Human Services
LFRP	UC National Laboratory Fees Research Program
MTDC	Modified Total Direct Cost
MRPI	Multicampus Research Programs and Initiatives
NCE	No Cost Extension
NIH	National Institutes of Health
OMB	Office of Management and Budget
PI	Principal Investigator
RFP	Request for Proposals
RGPO	Research Grants Program Office
RPAC	Research Policy Analysis and Coordination
TRDRP	Tobacco-Related Disease Research Program
UC	University of California
UCOP	University California Office of President
UCRI	University of California Research Initiatives

DEFINITIONS

Term	Description
Applicant PI	Principal Investigator who has applied for funding. May be referred to as Submitting PI on collaborative grants. Often referred to as simply the PI.
Contracts & Grants (C&G) Contact	Institutional Contracts & Grants (C&G) or Sponsored Projects Office representative at the grantee organization who is authorized to submit progress reports and all non-fiscal administrative requests during the life of the awarded grant. Also referred to as C&G Officer or C&G Official. Note: The Applicant or Submitting PI cannot be the Contracts & Grants Contact.
Co-Investigator	Collaborating Investigator on the grant.
Co-PI	The Co-PI is a Co-Principal Investigator who serves as an equal research partner with a Submitting PI/Applicant PI, and whose institution receives grant funds under a separate budget/contract. The Co-PI is responsible for all fiscal reporting related to their budget (budget expenditures are reported separately).
Equipment	Tangible property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000, per unit.
Facilities & Administration (F&A) Rate	Facilities & Administrative (F&A) rate, also known as Indirect Cost (IDC) rate, are approved overhead costs that are required to perform the work on the project.
Funding Announcement/ Request for Proposals (RFP)	A publicly available document produced by RGPO that announces a program intent to distribute discretionary funds consistent with the program or agency goals and objectives. Most RGPO programs call these Request for Proposals (RFP), but they can also be called Funding Opportunity Announcements (FOA), Request for Applications (RFA), Call for Applications, or Request for Qualifications (RFQ).
Grant Administration Manual	Policies and Procedure document for RGPO research programs. GAM can be found: https://www.ucop.edu/research-grants-program/grant-administration/index.html
Institutional Fiscal Contact	Authorized fiscal representative at the grantee institution who has the authority to approve financial reports. Note: The Applicant/Submitting PI and the Fiscal Contact cannot be the same individual.
Institutional Signing Official	Authorized signer on behalf of the grantee institution, also referred to as Signing Official. This individual may submit proposals on behalf of the Applicant PI. Note: The Applicant or Submitting PI cannot be the Signing Official; conversely, the Signing Official cannot be the PI.
PI Assistant	Provides grant management assistance to the Submitting PI or the Co-PI. The PI Assistant can lend support on activities such as progress reports, no-cost extensions, budget change requests, award resignations, and other deliverables. The PI Assistant role does not have signature authority for the grantee institution.
Principal Investigator	See Applicant PI and Submitting PI.
SmartSimple	The online grants management system used by RGPO to track applications and awards through the life cycle of the grant: https://rgpogrants.ucop.edu/
Subcontractor	Individual or institution working under the PI who is making a significant contribution to the award and responsible for the management of their own subcontract budget.
Subcontractor Co-PI	Subcontractor, who is also a Co-PI on the project, with responsibility for research activities at their institution and their own subcontract budget. Note: An individual cannot be both an applicant PI and subcontractor co-PI.
Submitting PI	Alternative term to Applicant PI, see definition above.

1 ELIGIBILITY REQUIREMENTS & PROCEDURES FOR NOTIFICATION AND FUNDING OF AWARDEES

Eligibility for specific award types and programs are outlined in the Request for Proposals (RFP) for each funding opportunity. Unless otherwise specified in a published funding opportunity, the UCOP Research Grants Program Office awards grants to University of California (UC) campuses, affiliated national laboratories, other UC locations, and to other California institutions. In accordance with UC policy, investigators who are UC employees **AND** who receive any part of their salary through UC must submit grant proposals through their UC campus C&G office (“Policy on the Requirement to Submit Proposals and to Receive Awards for Grants and Contracts through the University,” Office of the President, December 15, 1994). Exceptions, if allowed by the awarding grant program, must be approved by the UC campus where the investigator is employed, with appropriate documentation provided to RGPO.

After funding decisions have been made, all newly awarded grantees will be notified electronically through [SmartSimple](#). The process for the transfer of funds to awardees differs for University of California (UC) and non-UC institutions.

Please note: Grant awards are contingent on the availability of funds and selected before receipt of sufficient budget allocations to the programs. The Award Notice indicates RGPO program and administrative approval of the award but is not a guarantee of funding availability.

1.1 Pre-funding Administrative Review

The funding process is initiated when the PI agrees to accept an award. Selection for funding kicks off a Pre-funding Administrative review to address any modifications to the budget or scope of work recommended during the review process or requested by the PI. Adherence with RGPO policies is also verified during the pre-funding process. For example, if a PI for a new award has prior funding from RGPO, the submission and approval of all required deliverables, including reports for existing awards, must be up to date prior to the release of new funding (see Section 8 *Reporting Requirements*). If the submission of a Progress Report, Fiscal Forecast, Fiscal Report, or any deliverable is overdue, RGPO reserves the right to withhold funding of the PI’s new award, and any new awards to the PI’s institution, until these items are submitted and accepted by the respective program.

All applications recommended for funding are reviewed for compliance with required human subjects, animal care, biohazards, and/or United States Drug Enforcement Administration (DEA) Controlled Substance review and approval, study population justifications, and potential supplanting and/or overlapping support from other funding sources. Conducting any research with human participants, human materials, animals, biohazards, or DEA Controlled Substance without the required institutional approvals is not allowed and will result in immediate suspension of the award and potential recall of funds.

PIs utilizing controlled substances for research must obtain a Controlled Substance Registration Certificate (DEA Registration Certificate) issued by the U.S. Department of Justice, Drug Enforcement Administration prior to conducting any project activities which require purchasing, storing, and using controlled substances. The PI agrees that no work with controlled substances will be performed as part of this award contract until the required DEA Registration Certificate Approval for the project study is in place, if applicable. Where this certificate is required, RGPO reserves the right to recall all funds awarded and released for this award if the DEA Registration Certificate is not obtained by the start date for this award. Conducting any research using controlled substances without the required DEA Registration Certification is not allowed and will result in immediate suspension of the award and recall of funds.

Please note that existing funds for a project and its activities *may not* be supplanted by RGPO funds and reallocated for other organizational expenses. Any issues that may arise are negotiated and resolved between the assigned RGPO Program Officer and the grantee. In some cases, research projects may be approved with a modified term or scope of work from that proposed in the application. In such cases, the award will be made only after submission of an official addendum to the application that specifies the revised scope of work, signed by both the PI and the organizational official. This signed addendum must be documented in the grant file. The approved title of the project and project abstract will be published by RGPO on its public-facing website(s).

1.1.1 Additional Requirements For Non-UC Campuses

Institutions that are not University of California campuses, including UC-affiliated national laboratories, must adhere to additional requirements.

Before an award will be made to a prospective grant recipient, RGPO must ascertain that the recipient organization and PI have the following standard requirements in place:

- Adequate organizational, management, and accounting systems to administer the award and assure compliance with award terms and conditions.
- Adequate financial resources, equipment, facilities, and technical skills to perform the proposed work, or the ability to obtain them.
- Ability to perform the proposed work within the approved timeframe, taking into consideration all existing commitments.
- A satisfactory grant performance record.
- A satisfactory record of integrity and business ethics (i.e., liability insurance, bonding, indemnification of the UC Regents, and nondiscrimination and affirmative action in employment).

A prospective grant recipient may satisfy modified requirements as determined to be appropriate upon review by RGPO. Prospective grant recipients may meet these requirements directly or by making arrangements with another research organization that can meet these requirements.

1.2 Award Notices and Research Agreements

1.2.1 Award Notice

An Award Notice is issued electronically through [SmartSimple](#). The Award Notice will indicate the amount of the grant award, direct and indirect cost allocations, and the number of years of approved funding. In addition, it will also incorporate the RGPO Grant Administration Manual (GAM), other applicable RGPO regulations by reference, and will specify any special terms and conditions of the award. Any recommendations from the proposal reviewers that result in changes or contingencies will also be reflected in the Award Notice. The Award Notice indicates administrative approval of the Award but is not a guarantee of funding. In some cases, in advance of the issuance of an Award Notice, applicants recommended for funding may receive an initial email on the intent to fund, and formal notification of the funding will be issued upon approval of the state budget. For awards granted to UC campuses and other UC locations, the Award Notice is the official documentation for the grant; for institutions other than UC campuses or affiliated institutions, a formal Research Agreement is required.

1.2.2 UC Campuses

Upon resolution of all budgetary and scope of work issues, RGPO will post the Award Notice to [SmartSimple](#). The signing official for the recipient campus, the PI, the campus C&G offices, and the accounting office (deemed as the institutional contacts) will have access to the Award Notice located in the grant file in [SmartSimple](#). The Award Notice states the amount of the grant award, direct and indirect cost allocations, and the number of years of approved funding. In addition, it will also incorporate the RGPO GAM, other applicable RGPO regulations by reference, and will specify any special terms and conditions of the award. Any recommendations by the proposal reviewers that result in changes or contingencies are reflected in the Award Notice.

Once any pending administrative or research compliance issues have been resolved, RGPO will initiate payment through the UCOP ITF system in the approved amount. Funding may be released in increments, annually, or as a lump sum as determined by the RGPO program. Payments made for out-years of the award may not be expended until the required progress reports and fiscal forecasts for prior years are submitted and approved by RGPO. Please see Section *1.4.1 Multi-year Advance Payment Disbursements* for more information about RGPO requirements regarding lump-sum distributions. Expenditure of funds by the campus will constitute acceptance of the terms and conditions of the award.

If the duration of the grant is more than one year, administration of the grant in each subsequent year will be subject to the rules in the most recent edition of this manual. The C&G office, accounting office and the PI can retrieve updated editions of the GAM from [SmartSimple](#) under the Deliverables section “Useful Documents and Instructions.”

1.2.3 Research Agreements with Institutions other than UC Campuses

When the requirements described in Section 1.1.1 *Additional Requirements For Non-UC Campuses* have been satisfied, and upon resolution of all administrative issues, RGPO will prepare a research agreement (contract) between the recipient institution and the University of California. This research agreement constitutes the framework for administration of RGPO awards and incorporates by reference the original application, any addenda to the application, the Award Notice, and the current edition of this manual, which is supplied to the PI, C&G officials, and institutional signing officials as a link: <http://www.ucop.edu/research-grants-program/grant-administration/index.html>. The institutional signing official at the grantee organization will provide an electronic signature and submit to RGPO. The fully executed agreement will be uploaded to [SmartSimple](#) by RGPO and will be available for review in the grant file.

Upon receipt of the fully executed agreement and resolution of all administrative and research compliance issues, RGPO will release funding. The institutional official and the PI are then notified that funding is being released, and the Award Notice will be posted to [SmartSimple](#). Payment for the budgeted amount, including both direct and indirect costs, will be sent to the recipient institution, a process that requires at least 4–6 weeks to fully execute. Funding may be released in increments, annually, or as a lump sum as determined by the RGPO program. Payments made for out-years of the Award may not be expended until the required progress reports and fiscal forecasts for prior years are submitted and approved by RGPO. Please see Section 1.4.1 *Multi-year Advance Payment Disbursements* for more information about RGPO requirements regarding lump-sum distributions.

If the duration of the grant is more than one year, administration of the grant in each subsequent year will be subject to the rules in the most recent edition of the GAM, unless otherwise specified. The grantee C&G office, the accounting office, and the PI will receive notice of updates to policies as they are released online.

1.3 Proposition 56 (Prop 56)

For grants funded by the California Healthcare, Research and Prevention Tobacco Tax Act of 2016, project research activities are geographically restricted and must take place within the State of California. Any expenses accrued for research activities outside the State of California will be disallowed and will not be subject to reimbursement. Travel outside of California to conferences for the purposes of disseminating research findings and/or outreach with colleagues while ancillary to the research itself, is important and allowable with Prop 56 funds.

1.4 Distribution of Funds

If there is a violation of RGPO policies, then RGPO reserves the right to reduce or recall funds. Funds that have been transferred may be recalled when required reports or deliverables are delinquent, if lack of appropriate research progress is evident, if violations of the ethical conduct of research are found, if funds are expended in a manner determined to be inconsistent with the rules set forth herein, or if the award is terminated prior to its originally approved end-date.

Unless otherwise specified by the RGPO program, a single Award Notice is issued at the beginning of the grant period, and remains in effect until either award termination, or until an Amended Award Notice is issued. In general, an Amended Award Notice will not be issued if a grant ends early or if minor reductions in the Facilities and Administrative (F&A) rate occur.

Payment is initiated after an Award Notice has been provided, all remaining administrative issues related to the application are resolved, and for institutions other than UC campuses, after the program receives a signed agreement. For some programs, payments may be processed before all administrative requirements are resolved. In these instances, funds may be expended once the Award Notice has been approved. RGPO will notify grantees via email once funds may be expended. For grantees who will be paid on an annual basis, payment for each additional

year will be made as soon as possible after the start date for the next annual period and is contingent on timely receipt and acceptance by the program of the prior year's Annual Progress Report, Fiscal Forecast (see Section 8.1 *Annual/Final Progress Reports and Annual Fiscal Forecast*), Budget Change Requests (see Section 4.1 *Budget Change Requests*), and current assurances regarding human and/or animal subjects.

Each RGPO program or funding opportunity sets the start date for specific award mechanisms, and the Award start date is typically published in a Request for Proposals (RFP). Requests to modify or delay the published award start date are dependent on program-specific rules, and applicants and grantees should refer to the RFP or direct questions to their RGPO Program Officer if such modifications are requested.

1.4.1 Advance Payment Disbursements for Multi-Year Awards

Advance payment may be made of the approved multiyear budget in the Award Notice, providing that sufficient organizational controls are in place at the grantee organization. Consistent with the terms of the agreement, the grantee institution may be required to refund interest accrued on advanced funds at the termination of the award, or timing at the discretion of RGPO (see Section 1.4.2 *Return of Interest*).

When payment for multi-year awards is released in advance, the grantee is not allowed to expend future-year funds until the Annual Progress Report and Fiscal Forecasts for each award year have been approved by RGPO.

1.4.2 Return of Interest

When required by the Grant Agreement, non-UC institutions must maintain advance payments for each RGPO grant award(s) in an interest-bearing account, unless the following apply:

- the non-UC institution receives less than \$50,000 per year for the RGPO award, or
- the depository would require an average or minimum balance so high that it would not be feasible.

Interest must be returned to RGPO within 90 days of the award termination, or at timing at the discretion of RGPO. If required interest income is not returned, an action notice will be sent to the grantee institution and all future grant disbursements to the institution from RGPO will be frozen until the earned interest is received.

Non-UC recipients are expected to collect and maintain documentation related to the interest rate earned on RGPO grant funds for the duration of the award. This documentation must be provided as part of the Annual and Final Fiscal Report submissions.

1.5 General Data Protection Regulation (GDPR)

The GDPR is a data privacy regulation. It applies to the processing of personal data related to:

- Organizations operating within the European Union (EU), even if the data processing takes place outside of the EU
- The offering of goods and services to individuals in the EU
- The monitoring of behavior of individuals in the EU

For more information, please refer to the University of California GDPR [website](#).

2 MANAGEMENT OF GRANTS

If the duration of the grant is more than one year, administration of the grant in each subsequent year will be subject to the rules in the most recent edition of this Manual (<http://www.ucop.edu/research-grants-program/grant-administration/index.html>), unless otherwise specified. The C&G office, the accounting office, and the PI will receive notice of updates to policies as they are released online and are responsible for becoming familiar with any changes.

2.1 Communication with Research Program Staff

Each award is assigned to a Program Officer based on the subject area of the research, and any issues relating to the conduct of research under the terms of an award should be referred to the assigned Program Officer. PIs and

C&G Contacts are informed of the contact information of their assigned Program Officer at the time of award. A full list of assigned RGPO contacts for the award can be found in [SmartSimple](#) under the award's Project Contacts tab.

Program	Website	Email
CBCRP	http://www.cbcrp.org/	cbcrcp@ucop.edu
CFCPRP	https://www.ucop.edu/research-initiatives/index.html	firefighter-cancer@ucop.edu
CHRP	http://www.californiaaidsresearch.org/	chrp@ucop.edu
Climate Action Research Grants	https://uckeepresearching.org/california-climate-action/	climate@ucop.edu
CRCC*	https://www.ucop.edu/research-initiatives/index.html	ucric@ucop.edu
LRP*	https://www.ucop.edu/research-initiatives/index.html	ucric@ucop.edu
MRPI*	https://www.ucop.edu/research-initiatives/index.html	ucric@ucop.edu
TRDRP	http://www.trdrp.org/	trdrp@ucop.edu
UCRI Special Initiatives*	https://www.ucop.edu/research-initiatives/index.html	ucric@ucop.edu
All Other RGPO Funding Programs	https://www.ucop.edu/research-grants-program/	rgpogrants@ucop.edu

* Collectively these programs are managed under the UC Research Initiatives (UCRI)

2.2 Use of Funds

Award funds may be used only for expenditures necessary to carry out the approved research or related work to achieve the approved specific aims. In some instances, stipulations are placed on a portion of the expenditures as stated in the Award Notice.

Recipient institutions are required to maintain accounts, records and other evidence pertaining to costs incurred. Awardees may be subject to the examination and audit by the UC Regents and/or the State of California for a period of three years after receipt of Final Fiscal and/or Progress Reports. The examination and audit will be confined to those matters connected with the performance of the award, including, but not limited to, administering the award. Any changes in approved expenditures must be pre-approved according to the guidelines in Section 4 *Changes During Award Period*.

2.2.1 Other Support and PI/Key Personnel Percent Effort

CBCRP, CFCPRP, CHRP, and TRDRP follow the NIH Guidelines and calculations scheme for showing percent FTE as "months devoted to project." See the following links for further assistance:
[Conversion Chart](#)
[NIH Grants and Funding FAQs](#)

Overlapping support for the project is generally disallowed. If duplicate applications are approved for funding by both a program within RGPO and another agency, funding from only one source may be accepted; some programs may allow negotiated partial awards at their discretion. In the event that any key personnel named in an RGPO research project receives other support for research that duplicates any portion of the research funded by an RGPO award or that increases any key personnel's total percent effort above 100%, then it is the responsibility of the PI and institution to notify RGPO so that the return or reduction of overlapping funds or a change in project aims can be negotiated.

No key personnel can be funded more than 100% effort, based on a 12-month appointment, on any individual RGPO grant, or in combination from all other funded sources. Failure to notify RGPO of current active and pending grant support and accurate key personnel percent effort is considered a violation of the terms of the award. Please note that depending on the fund source, some UC intramural awards may not allow full-time academic personnel to charge effort to the award, or where allowable, effort may be charged only as summer salary. UC academic personnel effort on intramural awards, as defined by the program rules and fund source, must comply with both the allowable cost guidelines in the funding opportunity and with University of California Academic Personnel Policy. It is the UC campus responsibility to ensure academic personnel charged to an intramural award complies with the Academic Personnel Manual (<https://www.ucop.edu/academic-personnel-programs/academic-personnel-policy>).

The percent effort for the PI and all key personnel funded by the project for each RGPO grant must be established when the grant is initiated and updated with each Annual Progress or Final Progress Report. If the PI's effort changes by more than 25% or falls outside the specific program-required effort for the award type, then RGPO must be notified immediately. Finally, the percent effort for a grant reporting period must be stated as a specific number and not as a range. Please refer to the specific RGPO program or funding opportunity RFP for information on PI effort requirements for each award type. The minimum or maximum PI effort for each award type is listed in the RFP.

2.2.2 Travel

Allowable travel expenses are outlined in the RFP and must fall into one of the three categories identified below: *RGPO Grantee Meetings*, *Scientific Meetings*, and *Project Related Travel*. Unless otherwise specified by your program, funds may be reallocated across these three categories.

2.2.2.1 RGPO Grantee Meetings

Funds to defray the cost for domestic travel for grantee meetings with program staff should be budgeted in this category. These funds are intended to cover costs associated with site visits, project update meetings with RGPO staff, or program meetings arranged by your program.

2.2.2.2 Scientific Meetings

Funds to defray the cost of domestic and international travel may be allowed if required to present research or fulfill grant requirements, and if allowable within program rules and for the specific fund source.

2.2.2.3 Project-Related Travel

Funds to defray the cost of project-related domestic and international travel may be allowed if adequately justified and are consistent with program rules and fund source restrictions. Expenses in this category must be necessary for completion of the project, such as travel to survey sites to collect data; travel to institutions to analyze samples, perform experiments, collaborate with research partners or advisors; present or disseminate research findings; or receive training to complete required research activities or the training fellowship.

2.2.2.4 Fly America Act

When booking international travel RGPO recommends that flights comply with the Fly America Act when possible. For information on this program please visit: <https://www.gsa.gov/policy-regulations/policy/travel-management-policy/fly-america-act>.

2.2.3 Equipment and Residual Supplies

Only equipment requested in the application and approved in the award budget may be purchased with program funds. Equipment not approved in the award budget may only be purchased after prior written approval has been obtained from RGPO (see *Section 4 Changes During The Award Period*). Unless otherwise restricted by the grant program, approved equipment must be purchased and operational prior to the last 180 days of the original term of the grant. Exceptions may be made with advanced written approval for any equipment purchased within the approved term of a No Cost Extension (NCE).

2.2.3.1 Equipment

Equipment is defined as tangible nonexpendable personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the recipient institution for financial statement purposes or \$5,000 or greater per-unit.

When original or replacement equipment acquired under an RGPO award is no longer needed for the original project or program, or for other activities currently or previously supported by the awarding RGPO program, the recipient institution must request disposition instructions from RGPO regarding the equipment. Upon receipt of the disposition request, RGPO reserves the right to transfer title for this equipment to The UC Regents or to a third party or elect to allow title for the equipment to reside with the recipient institution.

As part of the disposition request, recipients are encouraged to explore opportunities for use of the equipment for other related purposes within the recipient institution and include information regarding the proposed repurposing of the equipment with the disposition request. If RGPO elects to retain or transfer title of the equipment to a third party, the reasonable cost of mailing and/or shipping return of the equipment will be paid by RGPO.

2.2.3.2 Residual Supplies

Supplies are defined as all tangible personal property other than property defined as “equipment” pursuant to the Federal Uniform Administrative Requirements. If the recipient institution has unused supplies exceeding \$5,000 (current market value) at the end of the grant award period, and these supplies are no longer needed for the original project or program or for other activities currently or previously supported by the awarding RGPO program, the recipient institution must present an inventory and disposition request regarding the unused supplies to RGPO. This inventory and disposition request must be submitted no later than 90 days after the end date for the grant award. Upon review of the residual supplies inventory list and disposition request, RGPO reserves the right to transfer the unused supplies to The UC Regents or to a third party or elect to allow the unused supplies to be allocated to the recipient institution. As part of the disposition request, grantees are encouraged to explore opportunities for use of the supplies for other related purposes within the recipient institution and include information regarding the proposed repurposing of the supplies with the disposition request.

If RGPO elects to retain or transfer the supplies to a third party, the reasonable cost of mailing and/or shipping return of the supplies will be paid by RGPO.

2.2.4 Pooled Expenses

Pooled expenses such as insurance surcharges, system wide networking surcharges, and other pooled training and facilities expenses **are allowable** as direct costs in cases where the grantee can certify that expenses meet the federal cost principles as defined in the Office of Management and Budget (OMB) [Uniform Guidance](#) (allowability, reasonableness, allocability, and consistency). For an expense to be budgeted as a direct cost, the cost must be:

1. **Allowable:** The cost must be allowable under the terms and conditions of the sponsored award, under applicable sponsor regulations (§200.403) and under institution policies.
2. **Reasonable:** The cost may be considered reasonable if the nature of the goods or services acquired, and the amount involved therefore, reflect the action that a prudent person would have taken under the circumstances prevailing at the time the decision to incur the cost was made (§200.404).
3. **Allocable:** The cost must benefit the project and be directly attributable to the project or activity being performed. The cost can only be assigned and allocated to the project(s) based on that portion of the expense that represents the direct benefit to the project (§200.405).
4. **Consistent:** Costs incurred for the same purpose in like circumstances must be treated consistently as disclosed to the institution's cognizant agency (§200.400(e) and §200.401(b)).

For grant programs that allow indirect cost recovery, indirect costs may be applied to pooled expenses.

2.2.5 Monitoring and Payment of Subcontractors

It is the applicant institution’s responsibility to monitor the performance of all subcontractors paid with funds from an RGPO grant award. Monitoring may include reviewing the subcontractor’s financial and programmatic reports and, when appropriate, evaluating the subcontractor’s completed milestones and deliverables. Grantees should thoughtfully review the subcontractor’s performance in these areas before signing any invoice authorizing payment of funds to a subcontractor.

Grant recipients must pay subcontractor invoices (for cost reimbursable subawards) within 60 days of receipt of the subcontractor’s invoice unless the recipient believes the invoice is improper, or if different terms were negotiated in the subcontract agreement.

RGPO will require verification of all subcontractors indirect cost rate agreements prior to the approval of the award budget. In some cases, the indirect cost rate will be established in the RFP.

2.2.6 Cost Share or Project Contributions

Cost sharing, institutional contributions, or matching funds are defined as cash or in-kind contributions to the

awarded project made by the grantee(s) or other third party. Cost contributions may be a required component of some funding opportunities or RFPs. If not so required, they may not be considered as part of the merit review of proposals. The form of allowable or required cost contributions will be outlined in the RFP, along with the requirements for documentation at the proposal and pre-funding stages. Project contributions information is collected in the “Project Contributions” section of [SmartSimple](#) and in any additional required attachments. Annual verification and reporting of cost contributions is required as part of the annual reporting. Please reference the specific RFP for applicable rules or requirements for project cost sharing or contributions for that opportunity.

2.2.7 Fraud or Misuse of Funds

Report of fraud or misuse of funds must be made to the program designee (see table below) or directly to the University of California, Office of the President Auditor (<https://www.ucop.edu/ethics-compliance-audit-services/audit/>; (510) 987-0482).

Program	Contact	Telephone/Email
CBCRP	Dr. Katherine McKenzie	cbrcp@ucop.edu; (510) 987-9876
CFCPRP	Dr. Kathleen Erwin	firefighter-cancer@ucop.edu; (510) 987-9889
CHRP	Dr. Rhodri Dierst-Davies	chrp@ucop.edu; (510) 987-9033
Climate Action Research Grants	Dr. Kathleen Erwin	climate@ucop.edu; (510) 987-9889
CRCC	Dr. Anna Ward	ucri@ucop.edu; (510) 987-9402
LFRP	Dr. Anna Ward	ucri@ucop.edu; (510) 987-9402
MRPI	Dr. Anna Ward	ucri@ucop.edu; (510) 987-9402
TRDRP	Dr. Tracy Richmond McKnight	trdrp@ucop.edu; (510) 987-9811
UCRI Special Initiatives	Dr. Anna Ward	ucri@ucop.edu; (510) 987-9402
All Other UCOP Projects	Dr. Kathleen Erwin	rgpogrants@ucop.edu; (510) 987-9889

2.2.8 Family and Medical Leave with Pay

All RGPO programs defer to the existing policy of the grantee institution(s) with regard to Family and Medical Leave with Pay. If the PI’s effort changes by more than 25% or falls outside the specific program-required effort for the award type, then RGPO must be notified immediately.

2.3 Grant Monitoring Site Visits

To fulfill our fiduciary role in regard to the stewardship of State of California funds, RGPO has developed a targeted process for review of grant funded projects involving the use of state funds. This active monitoring is accomplished through review of reports and correspondence from the recipient, audit reports, site visits, and other information available to RGPO. Periodic targeted site visits may be made for active awards and up to three years following award close-out, as needed. In most cases the grantee will be given at least seven days’ notice of the intention to conduct a site visit. During the site visit RGPO may conduct a review of the project and/or the financial management of expenditures related to the project in accordance with the audit standards set forth in California Revenue and Taxation Code section 30130.56, subdivisions (a) and (b) and Revenue and Taxation Code section 30130.57(b).

3 DIRECT COST BASE AND INDIRECT COST (F&A) RECOVERY

Allowable changes during the award period are listed below. Grant recipients should be familiar with the terms and conditions of awards pertaining to specific mechanisms. These may be found in the RFP.

3.1 Direct Cost Base for Determining Indirect Cost (F&A) Allocations for Applicable RGPO Awards

For RGPO research awards that allow indirect cost recovery (F&A) charged to the award, RGPO has adopted the standard definition of Modified Total Direct Costs (MTDC) found in [2 CFR 200](#) (Uniform Guidance) as its direct cost base when calculating indirect cost recovery, unless otherwise specifically noted in the RFP or Award Notice.

MTDC is defined at 2 CFR 200.68:

MTDC means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$25,000 of each subaward (regardless of the period of performance of the subawards under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of \$25,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs.

Institutions with federally negotiated rates set to a different direct cost base, such as a salary and wage base, should apply indirect expense in the same way as listed in their federally approved F&A agreement to RGPO awards. Any questions about interpretation of the base can be directed to the RGPO C&G Analyst assigned to your grant.

If a grantee or subcontractor does not have a federally negotiated F&A rate at the time of the proposal submission, the grantee and/or subcontractor may estimate what the federally negotiated rate will be at the time of award and include this rate in the proposed budget or may request a “*de minimis*” F&A rate of 25% MTDC. A higher indirect rate that has been accepted for a state or local government contract may be approved at the discretion of the applicable Program Director and the RGPO Executive Director.

3.1.1 Allowable Indirect Cost Recovery (F&A) for Primary Grantees and Subcontracts

For all awards made by RGPO Programs, indirect cost recovery (F&A) allowance will be specified in the funding opportunity RFP or Award Notice. For general reference only, the tables below summarize applicable rates for established programs and award types.

Each RGPO Program and award type has designated indirect cost/F&A rates determined by program rules and fund source. Unless otherwise specified, these rates are applicable to both primary grantees and subcontractors. In some cases, the approved F&A rate is scheduled to escalate, and new rates will be published in subsequent RFPs. For institutions with an F&A rate lower than the limits listed in the table below, the institution’s lower F&A rate would apply. The following table summarizes the currently scheduled IDC/F&A rates:

F & A Rates for RGPO Programs

Program or Award Type	Award Start	Non-UC On-Campus	UC On-Campus	Off-Campus
CBCRP (Conference Awards)	All	0%	0%	0%
CBCRP*	All	Federally Negotiated Rate	35%	25%
California Firefighter Cancer Prevention and Research Program	All	25%	35%	25%
CHRP*	All	35%	35%	25%
Climate Action Research Grants	All	10%	10%	10%
CRCC	All	N/A	0%	0%
LFRP (Grad Fellows)	All	N/A	8% Total Direct Costs	8% Total Direct Costs
LFRP (Collaborative Research and Training Awards)	All	Federally Negotiated Rate	Federally Negotiated Rate	26%
MRPI	All	0%	0%	0%
TRDRP (Training Awards)	All	0%	0%	0%
TRDRP*	All	Federally Negotiated Rate	35%	25%

*Except for mechanisms that disallow such cost recovery

Please note, if an institution does not have a federally negotiated rate agreement, an equivalently documented F&A rate may be used (upon approval of RGPO). If an institution does not have an approved F&A rate, the *de minimis* rate will be applied. However, if the negotiated rate is lower than the program’s stated cap, the federally negotiated rate would apply.

For grantee subcontractors, the following additional rules apply:

- For UC Multiple Campus Awards, or awards/sub-awards made by one UC Campus to another UC Campus, the Prime UC Campus does not recover indirect costs on the UC subaward, as these awards are being made within the UC, which is constituted as one legal entity.
- Subaward F&A costs are normally NOT included as part of the direct cost cap, barring restrictions as outlined in the RFP. With these awards, the total costs of the grant to the recipient institution may exceed the direct cost cap of the award type by the amount of the total indirect costs.

3.1.2 Documentation

At the initiation of a new award, RGPO requires documentation of the Federally Negotiated F&A Rate Agreement for the grant's start date as shown on the Award Notice. All grantees are required to provide a copy to RGPO of the institution's current, federally approved F&A rate agreement (or appropriate documentation of the alternative rate if the institution does not have a federal agreement). RGPO must be notified within 60 days of a change in an institution's F&A rate.

3.1.3 Increases in Institutional F&A Rate

Only those F&A rates that are documented prior to finalizing the award can be included in the approved award budget. The maximum F&A rate that RGPO will pay is the lesser of (1) the federally approved rate that is current for the budget year; or (2) the rate provided in the approved budget.

Under no circumstances will the approved budget for a project be supplemented to reflect an increase in F&A rate. It is not permissible to reallocate funds from the budget to cover increases in the F&A rate.

3.1.4 Decreases in Institutional F&A Rate

If the F&A rate decreases below the previously approved budgeted F&A rate, RGPO will pay indirect cost recovery at the new lower rate. RGPO will not award nor allow the institution to re-budget the difference between the originally requested amount and the amount generated by the new rate. Any overpayment of F&A costs must be returned to RGPO.

4 CHANGES DURING THE AWARD PERIOD

Grantees are required to adhere to the terms and conditions, allowable costs, and eligibility requirements of their award. Grantees are also expected to adhere to the personnel/partnership(s) requirements, specific aims, approaches, and project activities described in their funded proposal. In some cases, a grantee may request changes to approved activities. *Any substantive change must be discussed with and approved by the assigned Program Officer and/or Director prior to implementation. Changes that violate the terms and conditions, allowable costs, or eligibility requirements of the award are not permitted.*

Changes that do not require a formal change of budget, personnel, or institution as described herein may simply be approved in writing (via email or documentation in the grant file) by the Program Officer. The following sections provide guidelines on substantive changes requiring additional formal approval(s).

4.1 Budget Change Requests

Grant recipients may need to expend funds differently from the approved working budget. Changes to the approved budget are acceptable if they comply with the allowable cost guidelines for that funding mechanism or program, and if the expenditures are consistent with the general direction and approved scope of work for the grant proposal.

When to Submit a Budget Change Request

Barring substantive changes to the award as described in the paragraphs above, the following table provides an overview of individual budget category dollar amounts and percentages that need to be exceeded before submitting a formal Budget Change Request. For multi-institution collaborative awards, rules for travel costs and equipment purchases apply to each contractor/recipient institution's budget.

Budget Category	Dollar and Percentage Limits
Equipment	Any increase more than \$5,000 AND 25% of the Equipment budget category for the year
Travel	Any increase over \$5,000 of the Travel budget category for the year (see Section 2.2.2 <i>Travel</i> for additional guidance).
All Other	When funds are being moved into a previously unallocated budget category, or when the proposed budget change is the result of a significant change in research direction or approved specific aims.

Budget Change Requests may be submitted at any time. Ideally, such requests should be submitted for pre-approval via the Annual Fiscal Forecast (*if due*) within [SmartSimple](#). Alternatively, they may also be initiated by the assigned RGPO C&G Analyst or at the grantee's request. The Budget Change Request requires justification of the requested change(s), and should include:

- (1) specification of the budget categories and amounts from which and to which funds would be transferred;
- (2) the reason for the change – specification of how the change will facilitate the achievement of the reviewed and approved research aims; and
- (3) an explanation of how the purpose for which funds were originally approved will be met.

Changes may not be implemented until approval has been obtained via the Annual Fiscal Forecast and/or the Budget Change Request submitted within [SmartSimple](#). A requested change in expenditures may result in a change in the relative amounts between the direct costs and the indirect/F&A costs; however, the total approved award amount and the F&A rate approved in the original award cannot change (see Sections 3.1.3 *Increases in Institutional F&A Rate* and 3.1.4 *Decreases in Institutional F&A Rate* for requirements on changes to F&A costs).

When moving funds between categories, the following rules apply:

- It is permissible to move funds from a category that incurs F&A costs (overhead bearing) to a category that does not incur F&A costs (non-overhead bearing; e.g., from Personnel to Equipment). In this case:
 - You cannot move funds to a non-F&A category (non-overhead bearing) that did not have a previously approved budget allocation.
 - The F&A costs associated with the original budget category (overhead bearing) must be forfeited and returned to the program.
- It is also permissible to do the reverse and move funds from a category that does not incur F&A costs (non-overhead bearing) to one that does (overhead bearing; e.g., from Equipment to Personnel). In this case:
 - The transferred funds must be apportioned to the appropriate direct and F&A costs.

Certain changes to an award budget may be substantive enough that they will need to be enacted outside of, or in addition to, the Budget Change Request activity within [SmartSimple](#). Examples of these changes may include the following situations:

- The addition or removal of a subcontractor and/or increasing or decreasing the budget allocation of a subcontractor.
- The addition or removal of a collaborating partner or Co-PI (see Section 4.3 *Changes to Collaborative Awards*).
- Any significant changes to the use of approved supplement budgets or a request to decline an approved supplement.

Please contact your C&G Analyst if you are proposing any of the above changes. It is the responsibility of the Applicant PI to communicate these proposed changes to RGPO as soon as possible.

4.2 Changes to Key Personnel and Institutions

If for any reason work on an RGPO project cannot be continued either under the direction of the original PI or at the recipient institution, the PI or an official representative of the recipient institution must notify RGPO within seven business days of the project's change in status to discuss the available options. To obtain RGPO approval for changes, a written proposal must be submitted by the institution.

If, after discussion, RGPO does not accept the requested changes, all parties will be notified by RGPO and the project must be terminated. In this case the Final Progress and Final Fiscal reports, along with all unexpended funds, must be submitted to RGPO within 90 days of the termination date.

Some funding mechanisms and award types are not eligible to be transferred to a different PI. These may include, for example, graduate student or postdoctoral fellowships, or career development awards (see Section 4.4 *Changes to Career Development Awards*). Please refer to the program rules for other award types with this restriction.

4.2.1 Change of PI or Key Personnel

RGPO must be notified immediately if:

- The PI's percent effort devoted to the project falls below the minimum effort or exceeds the maximum effort required for the program-specific award type (see RFP for details).
- The PI's percent effort devoted to the project changes in one year by 25% or more from the level reported in either the application or the most recent report of a change (e.g., from 40% to 30% FTE).
- The employment classification or percent of the PI's appointment at the recipient institution changes.
- The PI withdraws from the project, resigns from the recipient institution, takes a leave of absence from the recipient institution for any reason or is not involved in the day-to-day operations of the project longer than 90 consecutive days.
- The PI is no longer eligible to be a PI at the recipient institution.
- The PI changes primary residence to one outside of California.
- Key personnel are deleted from or added to the project.

If the project can be continued at the original recipient institution, the recipient institution must propose the appointment of a new PI. To effect a change, if allowable, the institution must provide RGPO with a written explanation for the PI's resignation and a justification for the appointment and qualifications of the nominee, including their Biographical Sketch with Other Support statement. The program may request additional documents as needed. The nominee may assume responsibility for the project only after RGPO has approved the replacement. Ordinarily, a change of PI will not be approved during the first six months of an award. For multi-institution collaborative awards, all Co-PIs must be notified of a change in Applicant PI or Co-PI at any collaborating institution as part of the approval process (see Section 4.3 *Changes to Collaborative Awards*).

4.2.2 Change of Institution

If the PI is moving to another institution eligible to receive RGPO awards, a request may be made for program approval to have the award transferred to the new institution. At the request of the PI, ownership of materials and equipment purchased or created with RGPO grant funds for work on the project may transfer to the new institution (see Section 2.2.3 *Equipment and Residual Supplies*). Awards may not be transferred to program-ineligible institutions (see Section 4.5.3 *Unexpended Funds at Award Termination*). The procedures for transferring an award are outlined below.

4.2.2.1 Original Recipient Institution

The following items must be received from the original recipient institution prior to transfer of funds to the new institution:

- A **letter** from an institutional signing official (or C&G official) that provides the termination date and agreement to release the grant.
- A **Final Fiscal Report** and a return of funds within 90 days of the termination date.
- A **Final Progress Report** must be submitted and accepted, unless exempted by the RGPO program RFP.

Note: F&A costs revert to RGPO. The exact amount to be returned will be determined after receipt of a Final Fiscal Report, which must be submitted within 90 days of the termination date.

4.2.2.2 *Prospective Recipient Institution*

RGPO must receive a letter of acknowledgement to accept the award from the prospective recipient institutional official before RGPO can approve a new institution. In addition, the following documents must be completed in [SmartSimple](#) (contact the RGPO C&G Unit for instructions):

- **Signature Page**
- **Budget Summary** for remaining project period using the estimated unexpended balance from the original institution
- **Detailed Budgets** for each remaining year with associated budget justifications
- **Key Personnel**
- **Biographical Sketches** for any new or added key personnel
- **Other Support** for key personnel
- **Facilities and Resources**
- **Human and/or Animal Subject Assurances**, where applicable, from a federally approved IRB/IACUC
- **Proposed Milestones and Research Plan** for continuing the project at the new institution
- **Certification of the approved F&A rate** (where applicable)

4.2.2.3 *Indirect (F&A) Cost Recovery*

When the move involves a transfer from an institution eligible to recover indirect costs to one that has a lower F&A rate, the award to the prospective institution will provide funds for direct costs remaining in the grant plus indirect costs, if any, appropriate to the prospective institution.

When the prospective institution has a higher F&A rate than the original institution, the PI may reallocate direct costs to cover the higher indirect costs only if the research goals are not compromised by the re-budgeting.

RGPO must approve a written explanation from the PI as to how the research goals will be accomplished with a reduced direct-cost budget.

Payment to the prospective recipient institution (see Sections 1.2.2 UC Campuses and 1.2.3 Research Agreements with Institutions other than UC Campuses) will be made only after the original recipient institution has released the award and RGPO has approved the transfer. If the amount returned to RGPO is different from the estimated unexpended balance, the award to the new institution will be adjusted accordingly.

4.3 **Changes to Collaborative Awards**

Multi-institution, partnered, and collaborative awards are funds for research projects or teams from distinct institutions in which each partnering/collaborating institution has its own budget. Changes to multi-institution, partnered, or collaborative awards should follow the grant guidelines set forth in this document unless otherwise specified.

Specified multi-institution, partnered, and collaborative awards may be terminated if any of the participating Co-PIs and/or institutions resigns, depending on the award requirements for specific mechanisms and award types. Specifications are indicated in the RFP. Approvals for changes in the collaborating investigators and/or institutions are at the discretion of the RGPO funding program, will be considered on a case-by-case basis, and may require submission of a new application and peer review.

4.4 **Changes to Career Development Awards**

Program rules related to Fellowships and Training Awards may vary by the Funding Program and Award Type. Recipients of these awards should consult with their Program Officer and the RFP for program specific rules.

For the purposes of this rule, career development awards include New Investigator Awards, Faculty Seed Grants, Postdoctoral Fellowships, Predoctoral Awards, Graduate Student Fellowships, or any other trainee supplements. These career development awards cannot be reassigned to another PI, and the rules regarding changes to award budgets and activities are the same as those for all other research project awards with the following additional requirements.

If an award recipient resigns the award for any reason, they must submit a letter, co-signed by their institution's C&G official, notifying RGPO of the intent to terminate the award. RGPO must be immediately informed of all changes that may impact training, including changes to:

- the grantee's title and position;
- a drop in time commitment to less than the minimum required;
- the nature of the research project;
- the mentor and/or graduate advisor;
- the facilities and resources;
- other sources of support; and
- the institution.

The program will determine, on a case-by-case basis, whether these changes are acceptable. If the requested changes are not acceptable to RGPO, funding must be terminated immediately, or at the end of the academic term, as determined by the specific RGPO program. In this case, the Final Progress Report and the Final Fiscal Report along with all unexpended funds must be returned to RGPO within 90 days of the termination date. If the appointment status of a postdoctoral fellow changes, then the award must be terminated immediately.

4.5 Changes to the Funds Expenditure Timeline

4.5.1 Unexpended Funds

Award funds are expected to be expended in the budget year to which they are allocated. In some cases, expenditures may be delayed. Except for in the final budget year, unexpended funds may be carried forward to a subsequent budget year upon submission and approval of an Annual Fiscal Forecast (see Section 8.1 *Annual/Final Progress Reports and Annual Fiscal Forecast*). Funds must be carried forward into the same budget category from which they originated unless a Budget Change Request has been initiated and approved as outlined (see Section 4.1 *Budget Change Requests*). At the end of the originally approved final grant year, funds may be carried forward beyond the original grant termination date upon submission and approval of an NCE request (see Section 4.5.3 *No Cost Extension (NCE)*).

RGPO funds cannot be used for any fiscal year-end expenditures or deficits not directly related to the purposes of the RGPO award. RGPO will require justification of large expenditures in the final months of an award. *To affect a carry forward, grantees must also comply with all applicable carry forward procedures and timetables at their own institution.*

4.5.2 Annual Fiscal Forecast Required for Carry Forward Request

Thirty days prior to end of the grant year, grantees are required to submit both an Annual Progress Report and an Annual Fiscal Forecast (see Section 8 *Reporting Requirements*). The grantee must submit their Annual Fiscal Forecast via [SmartSimple](#) before the due date to carry forward the unexpended funds. If the forecasted carryforward exceeds 25% of the original annual direct cost allocation, an additional justification is required and will be reviewed in conjunction with the Annual Progress Report (see Section 8.1 *Annual/Final Progress Reports and Annual Fiscal Forecast*).

For grantees receiving annual grant payments, the subsequent year's disbursement may be postponed if the carry forward amount is greater than 50% of the current year's disbursement and greater than \$75,000. A grantee may request release of subsequent year funds when 25% of the funds that were carried forward have been expended or obligated. If the request is made prior to the due date for the next Annual Progress Report, at the discretion of the Program Officer, an interim Progress Report(s) may be requested. To avoid a disruption in cash flow, the grantee should submit the request in a timely manner. If this request is made at the next regularly scheduled annual reporting due date, follow regular reporting procedures.

Grantees of multi-year awards that received an advance payment need approval of the Annual Progress and Fiscal Forecast reports to expend the subsequent year's allotment. *Grants with advance or lump sum payments do not have an actual annual disbursement as multiple-year budget amounts have been advanced to the grantee; however, the grantee is still required to expend disbursements according to the budgeted period and cannot expend the subsequent year's budget without prior approval of the required reports.*

RGPO may require the return of unexpended funds not carried forward according to the approval procedures outlined above or may reduce future allocations accordingly.

4.5.3 No Cost Extension (NCE)

For most award types, in the event a PI is unable to complete the approved Scope of Work prior to the award end date, a NCE for 3 months, 6 months, 9 months, or 12 months may be requested, creating an additional project term of up to one year. Please note that NCE may not be allowable for certain programs. Such a request must be received by RGPO no later than 30 days prior to the end of the final year of the award. The request must include:

- The projected funds remaining
- An explanation for the need to extend the project
- Any updated assurances that are applicable

Three-month extensions require submission of only the request form. Thus, the Final Progress Report for the final 15 months (nine months if the original final period was six months) of the project is due 90 days after the new end date. Six-, nine-, and twelve-month extension requests require a complete Annual Progress Report and Annual Fiscal Forecast when the NCE request is made (see Section 8 *Reporting Requirements*). However, if a grant is awarded for 18 months and the PI has filed an Annual Progress Report within the past six months, then a three-, six-, or twelve-month extension request may be approved without submission of an additional Progress Report. In such cases, a full Progress Report must be submitted within six months of the extension period or three months after the grant terminates.

The approved Request for NCE serves also as the approval to carry forward funds into a new budget year. Approval of a carry forward or NCE does not confer approval for changes to the approved use of the funds. The Annual Fiscal Report is still due within 90 days of the original fiscal year end. Failure to submit the request and reports may result in loss of the funds remaining at the original termination date.

4.5.4 Unexpended Funds at Award Termination

Any unexpended funds remaining after award termination must be returned to RGPO within 90 days, including funds advanced to multi-year awards, as the encumbered future-year funding must also be returned to RGPO.

5 ACKNOWLEDGMENT OF SUPPORT

All publications supported by any RGPO funding opportunity are subject to the University of California and RGPO Open Access Policy (see Section 8.6 *RGPO Open Access Policy*). All publications resulting from research conducted with support from RGPO grants must also acknowledge receipt of such support by using the following wording:

This research was supported by funds from the [Name of Grant Program*] of the University of California, Grant Number [xxxx].

*The following are the approved Program Names for standing RGPO programs. Please consult with your assigned Program Officer if funds were received for a special initiative or funding opportunity not listed here:

- California Breast Cancer Research Program
- California Firefighter Cancer Prevention and Research Program (CFCPRP)
- California HIV/AIDS Research Program
- California Tobacco-Related Disease Research Program
- Climate Action Research Grants
- UC Cancer Research Coordinating Committee
- UC Multicampus Research Programs and Initiatives
- UC National Laboratory Fees Research Program

6 GRANTEE APPEAL PROCESS

RGPO has the right to terminate, suspend, or shorten the duration or amount of an award. Suspensions will be immediate. Thirty (30) days prior notice will be provided for early terminations. These decisions are binding and may be made without cause. If a grantee wishes to appeal such decisions, they must do so within ten (10) business days of receiving notification of the RGPO action by writing to the [Vice President of Research and Innovation, University of California, Office of the President](#). The appeal statement must be signed by the official authorized to sign for the grantee institution and include a complete description of the

basis for the appeal, and pertinent facts and documentation. Upon receipt of the appeal, the Vice President of Research and Innovation will make a final non-appealable determination and notify grantee. All initial RGPO decisions hold unless and until the Vice President of Research and Innovation reverses an earlier decision.

7 RESEARCH MISCONDUCT AND CONFLICT OF INTEREST

7.1 Research Misconduct & Other Administrative Actions

Applicants for, or Recipients of, grants from RGPO whose institutions have a Research Misconduct policy that is compliant with the Public Health Service Policies on Research Misconduct, 42 C.F.R. Part 93, must notify RGPO within 30 days of any of the following events:

- Initiation of an investigation of research misconduct, as defined in 42 C.F.R. Section 93.103, related to RGPO-funded programs (or programs under consideration for funding).
- Conclusion of the investigation. Applicant/Recipient must provide its findings to RGPO.
- A respondent's admission to wrongdoing or settlement.
- Any administrative actions or disciplinary actions against the respondent.

An Applicant/Recipient whose institution does not have a Research Misconduct policy that is compliant with the Public Health Service Policies on Research Misconduct, 42 C.F.R. Part 93, must notify RGPO within 30 days of any allegations of research misconduct related to RGPO-funded programs (or programs under consideration for funding). The matter will be referred to the University of California Office of Ethics, Compliance and Audit Services, who may then conduct its own inquiry and investigation, if necessary, of the allegations of research misconduct.

Applicants for, or Recipients of, grants from RGPO must promptly inform RGPO of any administrative action or notification of disciplinary action either at the time of application or within 30 days of the notification of disciplinary action or imposition of the administrative action.

RGPO will make a determination on any research misconduct and/or administrative actions related to RGPO funding based on the results of an investigation, including whether the funded investigator remains eligible to receive RGPO funding.

7.2 Conflict of Interest

RGPO grant recipients must adhere to the Federal OMB Uniform Guidance regarding conflict of interest. Grant recipients must establish safeguards to prevent employees, consultants, subcontractors, members of governing bodies, and others who may be involved in grant-supported activities from using their positions for purposes that are, or give the appearance of being, motivated by a desire for private financial gain for themselves or others (such as those with whom they have family, business, or other ties). These safeguards must be reflected in written standards of conduct. No employee, officer, or agent of a grantee may participate in the application for or administration of any RGPO award or contract funded by an RGPO award if he or she has a real or apparent conflict of interest. The officers, employees, and agents of the grantee may neither solicit nor accept gratuities, favors, or anything of monetary value from award contractors or parties to subawards. The grantee's standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the grantee.

The grantee is not required to submit its general standards of conduct to RGPO for review or approval; however, a copy must be made available to each officer of the grantee, employee, subcontractor and consultant working on the grant-supported project or activity, and each member of its governing board. A copy must also be provided to RGPO upon request. The grantee is responsible for enforcing its standards of conduct, taking appropriate action on individual infractions, and informing the program if the infraction is related to an award. If a suspension or separation action is taken by a grantee against a PI or other key personnel under an RGPO grant, the appropriate RGPO Program Officer must be notified immediately.

7.3 Disclosure of Violations

All RGPO grantees and subcontractors must disclose, in a timely manner, in writing to RGPO all violations of federal and California criminal law involving fraud, bribery, or gratuity violations potentially affecting the award. Written disclosure must be made to the RGPO Executive Director, Program Director and the University of California Office of Ethics, Compliance and Audit Services.

8 REPORTING REQUIREMENTS

A failure to submit the Annual Progress, Annual Fiscal Forecast, and Annual Fiscal Report on the scheduled due dates will result in a delay of continuation funding. Reports that become more than 60 days overdue may result in a recall of previously disbursed grant funding to the PI and a delay of new and continuation funding to the PI's institution.

PIs must submit a Progress Report, a Fiscal Forecast, and a Fiscal Report for each funded grant on at least a yearly basis. Partnered awards will require a Fiscal Forecast and a Fiscal Report for each partner; all partners will include their research progress in the prime PI's Progress Report. The requested reports are required for effective grant management by program staff and to meet specific reporting requirements of the California State Legislature. RGPO research programs are also responsible for disseminating the outcomes of funded research to specific interested constituencies, as well as to the general public. Progress Report abstracts may be used for website display and program publications, and, therefore, the abstracts must be understandable, in so far as possible, to the educated layperson and must reflect the substance of the progress achieved during the year.

Satisfactory reports for each grant must be submitted by the specified deadlines. The contents of required reports are outlined in Section 8.1 *Annual/Final Progress Reports and Annual Fiscal Forecast*. Reports must be accepted by program staff before any scheduled funding for the award is transferred. For all awards using human subjects, animal subjects, biohazard toxins and/or DEA agents, the program must receive copies of updated assurances and/or certificates when requested and the program notified of the expiration if applicable. Projects must maintain active status for all human subjects, animal subjects, biohazard toxins and/or DEA assurances for the duration of the research project. Failure to maintain up-to-date assurances will result in a stop work order and may result in a recall of award funds.

All reports are made available at least 30 days prior to the due date and are completed within [SmartSimple](#). Failure to submit the required information or to submit reports by the dates indicated may result in recall, reduction, delay, or discontinuation of funding. PIs and institutions with delinquent reports will not be eligible to receive new awards.

In addition to the standard reports listed below, programs may have additional reporting requirements for some award mechanisms. Please consult the Award Notice or the Program Officer assigned to the award for more details.

Annual Report Due Dates

Grant Start Date (as designated on Award Notice)	Annual Progress and Annual Fiscal Forecast Reports Due Date*	Annual Fiscal Report Due Date*
July 1	June 1	September 30
August 1	July 1	October 31
September 1	August 1	November 30
October 1	September 1	December 31
November 1	October 1	January 31
December 1	November 1	February 28/29
January 1	December 1	March 31
February 1	January 2	April 30
March 1	February 1	May 31
April 1	March 1	June 30
May 1	April 1	July 31
June 1	May 1	August 31

* Reports are due on the first business day on or following the due date. These dates apply to each subsequent year of a multi-year award.

Final Report Due Dates

Grant End Date (as designated on Award Notice)	Final Progress and Fiscal Reports Due Date*
June 30	September 30
July 31	October 31
August 31	November 30
September 30	December 31
October 31	January 31
November 30	February 28/29
December 31	March 31
January 31	April 30
February 28/29	May 31
March 31	June 30
April 30	July 31
May 31	August 31

* Reports are due on the first business day on or following the due date.

8.1 Annual/Final Progress Reports and Annual Fiscal Forecast

Either an Annual or Final Progress Report and an Annual Fiscal Forecast are required for each project year. No disbursement or permission to encumber continuation funds will be authorized unless an Annual Progress Report and Annual Fiscal Forecast have been submitted, reviewed, and approved by RGPO for compliance with the award requirements. Report templates and instructions are available through [SmartSimple](#) at least 30 days prior to their due date. The Annual and Final Progress reports contain the below sections. Note that not all sections may be required; please reference the [SmartSimple](#) portal and Grantee Instructions to determine your specific reporting requirements:

- **Progress Report Abstract**
- **Narrative of Progress Report**
- **Supporting Documents** (if applicable)
- **PI Other Support** (if applicable, template in [SmartSimple](#) or provided by your program)
- **Key Personnel** (if applicable)
- **Publications** (all new works completed during the performance year)
- **Patents and Licenses** (do not include any confidential information)
- **Animal and Human Subjects Use** (assurances must be current)
- **Human Subject Accrual Table** (if applicable)
- **DEA and Biohazard Assurances** (assurances must be current)
- **Community Engagement** (if applicable)
- **Advocacy Involvement** (if applicable)
- **Leveraged Funding** (if applicable)
- **People Supported by Grant** (Final report only)
- **Professional Development** (Final report only)

For projects requiring the use of Animal or Human Subjects, and/or DEA and Biohazard materials, current assurances for each award must be on file with the program via the Assurances tab on [SmartSimple](#). Updated assurances may be submitted with your Annual Progress Report or separately as appropriate (e.g., following the change in PI or institution) to ensure that all current assurances are on file. Failure to provide RGPO with required information about relevant assurances can result in discontinuation and/or recall of funding. Grants officials are also required to inform RGPO of any investigation or administrative action by the institution involving human or animal subject use by PIs receiving RGPO funds (see Section 7 *Research Misconduct and Conflict of Interest*).

Projects enrolling human subjects are required to complete the Human Subjects Accrual table. The PI may be required to explain any discrepancies between the projected and actual number and demographic profile of subjects reported and describe plans to address these inconsistencies.

For questions regarding any of the requirements of the Annual or Final Progress Report, please contact your Program Officer.

8.1.1 Annual Fiscal Forecasts

The Annual Fiscal Forecast is required to request a carry forward of unexpended funds and communicates to RGPO that a Budget Change Request (if needed) should be initiated. An Annual Fiscal Forecast is not required for the final project year unless an NCE is being requested (see Section 4.6.3 *No Cost Extension (NCE)*). All report templates are in [SmartSimple](#) and are made available in the Deliverables section of your Home page.

8.2 Annual and Final Fiscal Reports

This report is an official accounting of expenditures and must be signed by the authorized fiscal officer of the institution as identified on the grant. Revised Fiscal Reports will not be accepted more than 90 days after the original is received by RGPO.

As an official accounting of expenditures, the Annual and Final Fiscal Reports should not be used to request significant changes in the approved budget. Significant changes must instead be presented and explained in the Annual Fiscal Forecast (see Section 8.1 *Annual/Final Progress Reports and Annual Fiscal Forecast*) and/or Budget Change Request (see Section 4.1 *Budget Change Requests*) in [SmartSimple](#). While a change request may be submitted at any time, requested changes may not be implemented until RGPO approval is received.

The Annual Fiscal Report will display the current working budget in the system. Any changes to the approved budget due to an approved Budget Change Request should be reflected in the working budget. Negative balances are not allowed in any budget category. Non-UC institutions with multi-year awards paid in advance may be required to deposit the future years' funds in an interest-bearing account, per their research agreement. If applicable, grantees must indicate the interest rate and accrued interest for that year. Supporting documentation related to the interest rate also needs to be provided with the Fiscal Report(s).

For the Final Fiscal Report, if there are any funds remaining in the balance column, the funds must be returned to RGPO within 90 days. Funds should be returned via ITF for UC campuses and by check or EFT for non-UC institutions.

The Final Fiscal Report provides an official accounting of all final-year expenditures. Accrued interest, if applicable, must be included in the Final Fiscal Report. If the Final Fiscal Report shows a balance that is less than or equal to the amount to be paid in arrears, the Fiscal Report will constitute an invoice for the difference to be paid to the recipient institution upon receipt and acceptance of all Final Reports.

8.3 Post-Grant Required Outcomes Reports

Some programs require an additional Project Outcomes Report due two to three years after the end of the award period. Programs may begin requiring post-grant outcomes reports beginning with new and current awards with end dates after December 31, 2021. Grantees must complete the Outcomes report to be eligible to apply for future funding, where allowable, by that program. Complete the "Outcomes Report" reporting template in [SmartSimple](#), which includes the following sections:

- One high-level accomplishment or outcome enabled by the award.
- Impact on research field, including new tools or databases that new research can build on.
- Impact on policy or community.
- Impact on career outcomes, leveraged funds, and honors/awards/prizes.
- Publications and presentations since your Final Progress Report.
- Patents and licenses and other research products (such as contributions to biological or genetic material banks, audio or video products, data and research materials, databases, educational aids or curricula, instruments or equipment, models, protocols, software or NetWare, or copyrights).

8.4 Overdue and Delinquent Reports

Reports not received by the due dates become overdue. Once a report is more than one month overdue it becomes delinquent and a 30-day email notification is delivered to the PI(s) and Institutional C&G/Fiscal Contacts assigned to the grant. We encourage the PI(s) and Institutional C&G/Fiscal Contacts to respond directly

to any phone, email or letter notifications of overdue/delinquent reports. Please inform the Program Officer and/or the grant's assigned C&G Analyst of the reason for the delay in submission and provide an expected date of compliance. Once a report is more than two months overdue without adequate response, a final 60-day action notice will be sent. At this point the PI(s) and institution will risk recall of funds. In addition, PIs with delinquent reports risk rejection of future applications for funding. Finally, an institution having a grant with reports that are greater than two months overdue, which has not responded to a final 60-day action notice, is subject to having future grant disbursements from other RGPO programs frozen. A violation of this policy on any RGPO grant award will also result in a funding recall and/or grant application disqualification for the PI and the applicant(s)' institution regarding all RGPO grant programs.

8.5 Document Retention Policy

Financial records, supporting documents, statistical records, and all other grant-related records pertinent to an RGPO award must be retained for a period of three years from the date of submission of the Final Fiscal (expenditure) Report. Recipients of RGPO grant funds may be subject to the examination and audit of The UC Regents and/or the Auditor General of the State of California for a period of three years after receipt of Final Fiscal and/or Progress Report.

8.6 RGPO Open Access Policy

The [University of California](#) is committed to disseminating research as widely as possible to promote the public benefit through its Open Access Policy. To be compliant, RGPO grantee institutions and researchers grant RGPO a nonexclusive, irrevocable, worldwide license to exercise any and all rights under copyright and in any medium for all scholarly articles and similar works generated as a result of an RGPO grant award, and agree to authorize others to do the same, for the purpose of making their articles widely and freely available in an open access repository. This policy does not transfer copyright ownership, which remains with the author(s) or copyright owners.

Scope and Waiver (Opt-Out): The policy applies to all scholarly articles and similar works authored or co-authored as a result of research sponsored by an RGPO grant, except for any articles published before the adoption of this policy and any articles for which the grantee institution and/or researchers entered into an incompatible licensing or assignment agreement before the adoption of this policy. Upon express written request of the institutional grantee and/or researcher, RGPO will waive the license for a particular article or delay "open access" to the article for a specified period of time.

Deposit of Articles: Publications related to RGPO funding should be uploaded to the UC publication management system, eScholarship, and linked to the relevant program funder using this [link](#). For more information, refer to the Open Access policy page on the RGPO website:

<https://www.ucop.edu/research-grants-program/grant-administration/rgpo-open-access-policy.html>.