

# UNIVERSITY OF CALIFORNIA

## Agriculture and Natural Resources



# GUIDELINES TO RESEARCH AND COMPLIANCE

FOR PRINCIPAL INVESTIGATORS

2026



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# Introduction

The administration of extramurally funded projects is an increasingly complex process. In addition to being responsible for leading the research and public service missions that are core to the University, principal investigators and project directors (collectively referred to herein as PIs) also have ultimate responsibility for compliance with award terms and conditions, federal, state, and local regulations, and University policies directly related to their projects.

This document provides an overview of these policies and regulations. It is intended to supplement—not replace—the services provided by the ANR Office of Contracts and Grants (OCG), the ANR Business Operations Center (BOC), Statewide Programs and Research and Extension Center Operations (SWPR), or your unit business manager, UC Davis campus Contracts and Grants Accounting (CGA), and other ANR and campus offices charged with supporting ANR academics.

Herein you will find:

- Information relating to the most frequently asked questions about award administration
- Key points highlighting significant compliance requirements
- Contact information for the units that may assist you with the finer points of award administration and compliance
- Policy references and links to relevant policies

Our goal is to provide PIs with valuable resources so that they may better understand contract and grant administration and successfully administer sponsored awards.

The overall structure of this document is based on that of a similar set of guidelines developed at UC Davis with major modifications and additions incorporated to address conditions that are unique to the ANR systemwide applied research environment. The ANR team extends its sincere thanks to all who contributed to making this guide thorough, practical, and useful.

## Acronyms and Abbreviations

Acronym	Meaning
<b>ANR</b>	Agriculture and Natural Resources
<b>AREERA</b>	Agricultural Research, Extension, and Education Reform Act
<b>BOC</b>	UC ANR Business Operations Center
<b>BUA</b>	Biological Use Authorization
<b>CDFA</b>	California Department of Food and Agriculture
<b>CHP</b>	Chemical Hygiene Plan
<b>CITI</b>	Collaborative Institutional Training Initiative
<b>CLEB</b>	Committee for Laboratory and Environmental Biosafety
<b>Co-PI</b>	Co-Principal Investigator
<b>Co-PD</b>	Co-Project Director
<b>CGA</b>	UC Davis Contracts and Grants Accounting
<b>CPHS</b>	Committee for Protection of Human Subjects
<b>CUPA</b>	Certified Unified Program Agency
<b>EH&amp;S</b>	Environmental Health and Safety
<b>F&amp;A</b>	Facilities and Administrative ( <i>also known as</i> Indirect Cost)
<b>GAAP</b>	Generally accepted accounting principles
<b>GTS</b>	Grants Tracking System
<b>IACUC</b>	Institutional Animal Care and Use Committee
<b>IBC</b>	Institutional Biosafety Committee
<b>IIPP</b>	Injury and Illness Prevention Program
<b>IRB</b>	Institutional Review Board ( <i>Human Subjects</i> )
<b>MTDC</b>	Modified Total Direct Cost
<b>NICRA</b>	Negotiated Indirect Cost Rate Agreement
<b>NIFA</b>	USDA – National Institute of Food and Agriculture
<b>NIH</b>	National Institutes of Health
<b>NUD</b>	Non-University differential
<b>OCG</b>	UC ANR Office of Contracts and Grants
<b>OMB</b>	Federal Office of Management and Budget



<b>Acronym</b>	<b>Meaning</b>
<b>PD</b>	Project Director
<b>PI</b>	Principal Investigator
<b>REC</b>	Research and Extension Center
<b>SWPR</b>	UC ANR Statewide Programs and Research and Extension Center Operations
<b>TC</b>	Total Cost
<b>TDC</b>	Total Direct Cost
<b>UC</b>	University of California
<b>UCOP</b>	University of California – Office of the President
<b>USDA</b>	United States Department of Agriculture
<b>VP ANR</b>	Vice President – Agriculture and Natural Resources

# Glossary

Term	Definition
<b>Academic cost recovery</b>	It is the policy of ANR to allow the inclusion of academic salary in grant application budgets. Principal Investigators and Co-Principal Investigators are encouraged to recover reasonable and appropriate salary support from grants and contracts proportionate to the function of the time and effort devoted to the project. All reimbursements for academic effort must be planned in the budget at the proposal stage. No retroactive application of salary and benefits recovery is allowed.
<b>Allocable costs</b>	Allocable costs are those <i>allowable</i> costs (see allowable costs) that actually benefit the grant or contract activities to which they are being assigned. If an incurred cost benefits two or more projects, the cost should be allocated proportionately <a href="#">2 CFR 200.405</a>
<b>Allowable costs</b>	Costs charged to a grant or contract that are necessary, reasonable, allocable, consistently treated, and not specifically disallowed by the sponsor or program as determined by the terms and conditions of the award and/or appropriate cost principles. Certain types of costs, such as the cost of alcoholic beverages, are not allowable and may not be charged to a contract or grant. <a href="#">2 CFR 200.403</a>
<b>Animal care use protocol (IACUC)</b>	A protocol submitted to the Institutional Animal Care and Use Committee (IACUC) that ensures the humane care and use of animals in research studies according to the guidelines set forth in the U.S. Public Health Service (PHS) policy.
<b>Award</b>	An award is an agreement (contract, grant, or cooperative agreement) between a sponsor and the University for externally supported research, education, or public service programs.
<b>Award number</b>	The unique identifying number assigned by the sponsoring agency (or by OCG in the absence of a sponsor-assigned award number) to the contract, grant, or cooperative agreement award document.
<b>Award period end date</b>	The date the award ends.
<b>Award period start date</b>	The date that a new, renewal, or supplemental agreement award becomes effective. The term effective, for reporting purposes, means the calendar date recognized by the award as the beginning for performance and incidence of costs.

Term	Definition
<b>Budget</b>	A financial plan that estimates the costs of conducting future activities. The budget is intended to express the program objectives and how they will be carried out in terms of resources required.
<b>Budget adjustment or modification</b>	The act of amending the budget by moving funds from one category or line item to another.
<b>Budget periods</b>	The intervals of time into which a multiple-year project period is divided for budgetary/funding purposes.
<b>Certified effort</b>	That effort shown on an effort report that has been certified by the employee performing the work or by a person with firsthand knowledge of the work performed. The purpose of the certification is to confirm that the work charged to a sponsored project was actually performed.
<b>Certifier</b>	A certifier is someone who has firsthand knowledge of work performed on specific projects and who certifies the effort reports attesting to the fact that the work has been performed. For academic or professorial titles and professional or high-level staff, the employee usually certifies his or her own report. Effort reports for nonprofessional employees are usually certified by the PI or by the employee's direct supervisor.
<b>Close out</b>	The act of completing all internal procedures and sponsor requirements to terminate or complete a research project.
<b>Code of Federal Regulations (CFR)</b>	Comprehensive set of legally binding rules that federal agencies use to carry out laws and manage federal programs. <a href="#">2 CFR 200</a>
<b>Conflict of commitment</b>	Conflict of commitment refers to situations where an employee's outside professional activities may interfere with their responsibilities to the University. Employees are expected to disclose their outside activities and obtain approval if those activities could potentially interfere with their university responsibilities. Conflict of commitment is addressed through UC's policies, which outline expectations for managing external commitments that might interfere with university responsibilities.
<b>Conflict of interest (COI)</b>	A situation in which an investigator's outside financial interest(s) or obligation(s) -- whether real or perceived -- could bias a research project or cause harm to human subjects participating in the project. Investigators must comply with University of

Term	Definition
	California systemwide COI policies as well as applicable State of California laws and federal regulations.
<b>Continuation project (non-competing)</b>	Refers to a project approved for multiple-year funding, although funds typically are committed for only one year at a time. At the end of the initial budget period, progress on the project is assessed. If satisfactory, an award is made for the next budget period, subject to the availability of funds. Continuation projects do not compete with new project proposals and are not subjected to peer review beyond the initial project approval.
<b>Contract</b>	An agreement between two or more entities that creates an obligation to do (or not do) a particular thing one is otherwise entitled to do (or not do). To be legally enforceable, a contract must have subject, consideration, and competent party.
<b>Cooperative agreement</b>	A federal assistance agreement; distinguished from grants on the basis of the level of federal involvement. If the federal government is substantially involved in programmatic work under the award, the assistance arrangement is a cooperative agreement.
<b>Co-Principal Investigators / Co-Project Directors</b>	Key personnel who have responsibilities similar to those of a PI on a project. While the PI has ultimate responsibility for the conduct of the project, the Co-PI is also obligated to ensure that the project is conducted in compliance with applicable laws and regulations as well as University policy governing the conduct of extramural projects.
<b>Cost principles</b>	A set of principles that provide guidance on how to determine whether charges to a federal award are allowable, allocable, and reasonable. They also provide guidance on how to develop indirect cost rates.
<b>Cost share or match</b>	<p>All contributions, including cash and in-kind contributions, that a recipient makes to an award. If the award is federal, only allowable non-federal contributions qualify as cost sharing and must conform to all applicable requirements: they must be necessary and reasonable to accomplish the program objectives, allowable under cost principles, properly documented, and auditable.</p> <p>Committed Cost Share/Match: Cost sharing that is specifically pledged in the proposal budget or award. Committed cost sharing can include mandatory cost sharing (cost sharing required by a particular funding agency) as well as voluntary committed cost sharing. Voluntary committed cost sharing is cost sharing that was not required by the funding agency but</p>

Term	Definition
	<p>was volunteered by the PI/University and quantified in the proposal.</p> <p>Uncommitted Voluntary Cost Share: effort over and above what was committed and budgeted for in a sponsored agreement.</p>
<b>Direct costs</b>	Those costs that can be specifically and easily identified with a particular sponsored project or activity and are allowable under the sponsoring organization guidelines.
<b>Effort</b>	Effort is the portion of time spent on a particular activity, expressed as a percentage of the individual's total activity for the institution.
<b>Effort commitment</b>	The portion of time committed to a particular activity, expressed as a percentage of the individual's total activity for the institution. An effort commitment is that effort that is committed or promised prior to or at the start of the project.
<b>Effort reporting system</b>	A system used to certify to federal granting agencies that the effort required as a condition of an award has actually been completed. Effort reporting is required under 2 CFR 200 (Uniform Guidance), which requires certification of effort spent by employees whose salaries are charged directly to federal funds and federal flow-through funds, as well as for reporting committed cost sharing.
<b>Equipment</b>	<p>Generally, equipment is classified as tangible, nonexpendable property having an acquisition value of \$5,000* or more and a normal life expectancy of one year or longer. Compare with Supply.</p> <p>*Threshold increased to \$10,000 per 2 CFR 200, however, for UC ANR the acquisition threshold is \$5,000 per our current indirect cost rate agreement (NICRA) until its amended.</p>
<b>Expiration date</b>	The final date for the approved performance period by which all project activities must be completed. See also award period end date.
<b>Extension</b>	An additional period of time given by the sponsor to an organization for the completion of work on an approved grant or contract. An extension allows previously allocated funds to be spent after the original expiration date. See also No Cost Time Extension (NCTE).
<b>Extramural funds</b>	Funds that are not regularly budgeted but rather are received under grants, donations, or contracts from sources (private, state, federal, etc.) outside the University.

Term	Definition
<b>Facilities and Administrative (F&amp;A) costs</b>	See Indirect costs.
<b>Financial interest</b>	Financial interests include anything of significant monetary value, including but not limited to salary or other payments for services; equity interests (e.g., stocks, stock options or other ownership interests); intellectual property rights (e.g., patents, copyrights and royalties from such rights); or holding a position as an officer, director, agent, or employee of a business entity. Financial interest includes such interests held by a PI or other Investigators and by their spouses, domestic partners and/or dependent children. See the Conflict-of-Interest Form 800, Public Health Service/Department of Energy COI Form, or Form 700U instructions for applicable instructions and thresholds dependent upon sponsoring agency.
<b>Generally accepted accounting principles (GAAP)</b>	Uniform minimum standards of and guidelines to financial accounting and reporting. Currently, the Financial Accounting Standards Board (FASB), the Governmental Accounting Standards Board (GASB), and the Federal Accounting Standards Advisory are authorized to establish these principles. The UC system complies with GASB.
<b>Grant</b>	An award of funds from a sponsor for a specific purpose, such as a project, program, or initiative. These funds are used in pursuit of a defined goal and must be spent according to the terms agreed upon in the award. Grantors can include government agencies, private foundations, and corporations. A Federal grant is an assistance award authorized by federal law to support programs that the government wishes to encourage and that accomplishes a public purpose.
<b>Indirect costs</b>	Indirect costs (also called Facilities and Administrative (F&A) cost or overhead) are those costs that are incurred for common or joint objectives and cannot be easily identified with a particular project or grant with a reasonable degree of accuracy. Indirect costs are real, actual expenses incurred by the University to support research, instruction, or other sponsored activities. Since these costs benefit multiple projects and activities, they are recovered using a federally Negotiated Indirect Cost Rate Agreement (NICRA) rather than charged directly to individual grants. At UC, indirect cost rates are negotiated with the U.S. Department of Health and Human Services and applied to eligible awards to recover these shared expenses. The applicable rate to use is dependent on the type

Term	Definition
	<p>of activity (research vs public service) and if the work is performed on- or off-campus.</p> <p>The Off-Campus F&amp;A Rate is applied to sponsored projects conducted at facilities not owned by the university. The On-Campus F&amp;A Rate is applied to sponsored projects when the project is conducted on a campus.</p> <p>Visit the <a href="#">OCG website</a> for more information on ANR indirect cost rates.</p> <p>Some sponsors may restrict reimbursement of indirect cost to less than the full rate. An exception to approved indirect cost rates may be requested in certain circumstances. This sponsor policy exception does not generally apply to for-profit organizations or foreign government organizations.</p> <p>For a recharge activity, indirect costs are collected from non-University clients through assessment of the non-University differential (NUD).</p>
<b>Institutional Review Board (IRB)</b>	<p>The Institutional Review Board (IRB) is an administrative body established to protect the rights and welfare of human subjects in projects conducted under the auspices of the University of California. The IRB has the authority to approve, require modifications in, or disapprove all project activities that fall within its jurisdiction.</p>
<b>Modified total direct costs (MTDC)</b>	<p>It is a cost base used to calculate indirect costs under UC's federally Negotiated Indirect Cost Rate Agreement (NICRA). Consists of direct costs for salaries and wages, fringe benefits, materials and supplies, services, travel, and subawards up the first \$25,000* of each subaward. Equipment, capital expenditures, charges for patient care and tuition remission, rental costs, scholarships, and fellowships, as well as the portion of each subaward in excess of \$25,000*, are excluded from modified total direct costs. While commonly used for federal grants, it may not apply to awards with sponsor-imposed limitations or alternative indirect cost bases.</p> <p>*Threshold increased to \$50,000 per 2 CFR 200, however, for UC ANR the threshold is \$25,000 per our current indirect cost rate agreement (NICRA) until its amended.</p>
<b>No-cost time extension (NCTE)</b>	<p>An extension of the period of performance beyond the expiration date to allow the Principal Investigator to finish a project. No additional funds are provided.</p>

Term	Definition
<b>Non-University differential (NUD)</b>	A percentage surcharge assessed to a non-University client, in addition to the recharge rate. NUD is UC's mechanism for recovering the indirect (or overhead) costs for a recharge activity from non-University clients.
<b>Office of Management and Budget (OMB)</b>	<p>The primary missions of the federal OMB are to assist the President of the United States in overseeing the preparation of the federal budget and to supervise its administration in Executive Branch agencies. In helping to formulate the President's spending plans, OMB evaluates the effectiveness of agency programs, policies, and procedures, assesses competing funding demands among agencies, and sets funding priorities. OMB ensures that agency reports, rules, testimony, and proposed legislation are consistent with the President's Budget and with Administration policies.</p> <p>In addition, OMB oversees and coordinates the Administration's procurement, financial management, information, and regulatory policies. In each of these areas, OMB's roles are to help improve administrative management, to develop better performance measures and coordinating mechanisms, and to reduce any unnecessary burdens on the public. See also 2 CFR part 200 or Uniform Guidance.</p>
<b><u><a href="#">2 CFR part 200</a></u> or Uniform Guidance</b>	This part of the code of federal regulations establishes <b>uniform administrative requirements, cost principles, and audit requirements for Federal awards</b> . Federal agencies must not impose additional requirements except as allowed in <u><a href="#">§§ 200.102, 200.211</a></u> , or unless specifically required by Federal statute, regulation, or Executive order.
<b>Participant Support Costs</b>	<p>On Federal funds, Participant support costs are defined as direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training projects.</p> <p>A participant is a Non-UC employee who is receiving, not providing, a service or training opportunity from a workshop, conference, seminar, symposium or other short-term instructional or information sharing activity funded by the federal award. Attendance at the conference or training is for their own benefit, not the benefit of the project. A participant is not the provider of a service or training such as a collaborator on a project who is contributing to the project deliverables. Participant support costs do not include expenses incurred to incentivize or enable research subjects to participate in studies.</p>

Term	Definition
<b>Participating campus</b>	A campus that assists in carrying out the scope of work awarded to the prime campus. Each participating campus is responsible, on its respective campus and for its portion of the project, to carry out contract and grant administration policies and responsibilities that are assigned or delegated by the prime campus.
<b>Prime campus</b>	The campus submitting the overall multiple-campus proposal to and receiving an award from a sponsor. The prime campus is responsible for carrying out all contract and grant administration policies and responsibilities as presented in the <a href="#">UCOP Contract and Grant Manual</a>
<b>Principal Investigator (PI) or Project Director (PD)</b>	<p>The Principal Investigator (PI) or sometimes referred to as the Project Director (PD) (used interchangeably herein), is the individual designated as head of a research project. The eligibility criteria to serve as a PI is different for UC campus faculty than for ANR academics. For ANR county and statewide program-based academics, the VP ANR has determined that individuals appointed to the following job titles are eligible to be designated PI on a project:</p> <ul style="list-style-type: none"> <li>• Cooperative Extension Advisor series</li> <li>• Director, Research and Extension Center</li> <li>• Director, Statewide Program</li> <li>• Cooperative Extension Specialist series</li> </ul> <p>With the approval of the VP ANR, individual exceptions to the PI eligibility policy may be permitted. More information about eligibility (section 1-500) and responsibilities (section 1-330) can be found in the <a href="#">UCOP Contract and Grant Manual</a> and on <a href="#">OCG's website</a>.</p>
<b>Program Income</b>	Gross income earned by a recipient or subrecipient that is directly generated by a funded activity or earned as a result of the award. Program income must be used for the original purpose of the award. Program income earned during the period of performance may only be used for costs incurred during the period of performance or allowable closeout costs. Program income may be additive (in addition to the sponsored budget), deductive (included on the budget and reduces the amount paid by the sponsor), or cost sharing (used to meet match requirements.)

Term	Definition
<b>Project period (or Period of Performance)</b>	The total time for which support of a project has been programmatically approved. A project period may consist of one or more budget periods.
<b>Proposal</b>	An application for funding that contains all information necessary to describe project plans, staff capabilities, and funds requested. Formal proposals are officially approved and submitted by an organization in the name of a Principal Investigator.
<b>Research Security</b>	<p>Research security at the University of California (UC) refers to the coordinated policies, procedures, and compliance activities designed to protect the integrity, openness, and responsible conduct of UC research while ensuring compliance with federal, state, sponsor, and UC systemwide requirements.</p> <p>At UC, research security supports the University’s public mission by balancing open scientific collaboration with risk management and regulatory compliance.</p>
<b>Responsible and Ethical Conduct of Research (RCR) training</b>	Research integrity is critical for research excellence, public trust and to prepare future scientists. Institutions foster an atmosphere conducive to research integrity through prevention and detection of research misconduct by training academics and staff regarding policies and procedures.
<b>Sponsor</b>	The external organization or entity that funds a research, education, or service project. A sponsor may be a pass-through entity (i.e. lead applicant) if different from the Prime Sponsor. Prime Sponsor refers to the original, ultimate source of funding for a sponsored project or grant, even if the money flows through other organizations.
<b>Sponsored projects / programs</b>	Sponsored projects or programs are externally funded contract or grant activities to either carry out research, a public purpose, or provide a direct benefit to the sponsor. Sponsored projects typically have a specified statement of work with identified deliverables for the University to execute and are subject to financial reporting and audit.
<b>Subaward (see also subrecipient)</b>	Subaward means an award provided by a pass-through entity (lead applicant) to a subrecipient for the subrecipient to carry out a portion of the research or substantive effort of an award received by the pass-through entity. It does not include payments to a subcontractor/service provider. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

Term	Definition
	See the <a href="#">OCG – Subrecipients website</a> for additional information.
<b>Subcontract</b>	Subcontract means a legal instrument by which a recipient or subrecipient purchases property or services needed to carry out the project or program under an award. (Procurement relationship)
<b>Subcontractor / Contractor / Vendor / Service Provider</b>	Subcontractor, Contractor, vendor, or service provider means an entity that receives a subcontract as defined in this section. (procurement relationship)
<b>Subrecipient (see also subaward)</b>	Subrecipient means an entity that receives a subaward from a pass-through entity (lead applicant) to carry out part of an award; but does not include an individual that is a beneficiary of such award.
<b>Supplies and/or Materials</b>	<p>Generally, a supply or materials item is classified as one that is expendable and that has an acquisition value of less than \$5,000* and a normal life expectancy of less than a year. Compare with Equipment.</p> <p>*Threshold increased to \$10,000 per 2 CFR 200, however, for UC ANR the acquisition threshold is \$5,000 per our current indirect cost rate agreement (NICRA) until its amended.</p>
<b>Terms and conditions of an award</b>	All legal requirements imposed on an agreement by the sponsor, whether by statute, regulation(s), or terms in the award document. The terms may include both standard and special provisions that are considered necessary to protect the sponsor’s interests while still complying with relevant university policies and guidelines.
<b>Total cost (TC)</b>	The sum of the direct cost plus the F&A costs (also referred to as indirect costs) of a project.
<b>Total direct cost (TDC)</b>	The sum of all direct costs of a project.

# Roles and Responsibilities

This table defines key proposals and award responsibilities by different offices.

Parties	Administrative Responsibilities	Fiscal Responsibilities	Technical Responsibilities
<b>Principal Investigator (PI) and Project Staff</b>	<ul style="list-style-type: none"> <li>• Develop complete, timely proposals compliant with University policies and procedures.</li> <li>• Prepare all required reports and submit them to sponsors.</li> <li>• Understand sponsors' terms and conditions and University policies and procedures that relate to sponsored project administration.</li> </ul>	<ul style="list-style-type: none"> <li>• Manage and control project funds, including subrecipient funds, to ensure compliance with award terms and conditions and University policy.</li> <li>• Authorize expenses.</li> <li>• When applicable, certify personnel effort and approve cost-share reports.</li> <li>• Review ledgers monthly to ensure allowability and compliance with budgetary constraints.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure scientific integrity and manage projects.</li> <li>• Manage subrecipient progress.</li> <li>• Ensure that deliverables and scope of work requirements are met.</li> </ul>
<b>Business Operations Center (BOC), Statewide Programs and Research and Extension Center Operations (SWPR), or Unit Business Manager</b>	<ul style="list-style-type: none"> <li>• Assist with development of proposals.</li> <li>• Prepare administrative reports for sponsors.</li> <li>• Facilitate hiring of personnel and notify Human Resources of changes in FTE.</li> <li>• Facilitate procurement transactions for purchases of goods and services</li> <li>• When applicable, track equipment.</li> <li>• When applicable, prepare final equipment inventory and submit it to OCG.</li> </ul>	<ul style="list-style-type: none"> <li>• Work with CGA to establish award account(s)</li> <li>• Process financial and budget transactions.</li> <li>• Keep PI informed of the financial status of the award and assist in administration of the award.</li> <li>• Provide the PI with business and accounting expertise.</li> <li>• Prepare cost share reports</li> <li>• Monitor effort commitments and Effort Report certifications.</li> <li>• Assist with close out of account(s).</li> </ul>	

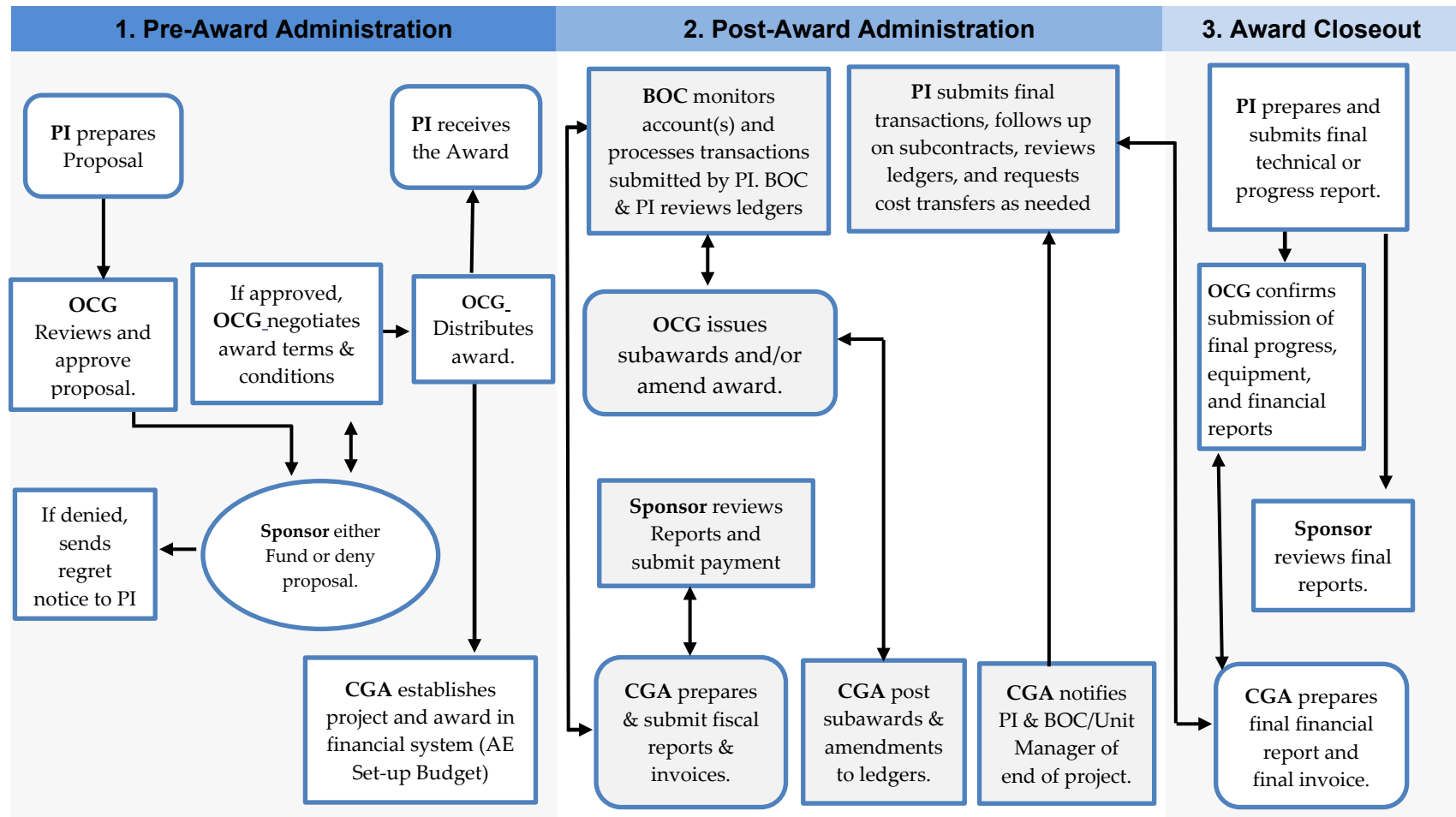
Parties	Administrative Responsibilities	Fiscal Responsibilities	Technical Responsibilities
<b>UC Davis Contracts and Grants Accounting (CGA)</b>	<ul style="list-style-type: none"> <li>• Establish awards in the financial system.</li> <li>• Approve project expenditure accounts and ensure that reporting attributes are accurate.</li> </ul>	<ul style="list-style-type: none"> <li>• Establish expenditure account(s) for the award</li> <li>• Prepare financial reports over the course of the project.</li> <li>• Prepare invoices and letter-of-credit drawdowns and perform collection activities.</li> <li>• Coordinate effort reporting process.</li> <li>• Perform post-audit reviews of financial transactions.</li> <li>• Coordinate award financial close.</li> </ul>	
<b>ANR Office of Contracts and Grants (OCG)</b>	<ul style="list-style-type: none"> <li>• Advise PIs and administrative support staff on budget preparation and the calculation of indirect costs.</li> <li>• Review proposal budgets, ensuring compliance with university and sponsor policies.</li> <li>• Collect internal approvals and Conflict of Interest disclosure forms.</li> <li>• Review and approve proposals.</li> <li>• Submit proposals on behalf of the institution or provide PI authorization to submit.</li> <li>• Negotiate awards and accept them on behalf of The Regents.</li> <li>• Initiate and distribute subawards to project collaborators.</li> <li>• As required, approve and submit post-award requests for prior approval .</li> <li>• Monitor contract and grant close out.</li> </ul>	<ul style="list-style-type: none"> <li>• Distribute awards to appropriate administrative offices, such as BOC, SWPR, Research and Extension Centers, Controller/Business.</li> <li>• Services, Environmental Health and Safety, and Extramural Funds Accounting.</li> <li>• Review and approve requests to establish an advance account.</li> </ul>	

# Pre- and Post-Award Flowchart

This flowchart illustrates the major steps and responsibilities in the extramural funding lifecycle performed by

- 1) PIs, the Business Operation Center (BOC) or Unit Business Managers.
- 2) ANR Office of Contracts and Grants (OCG).
- 3) Sponsor Agencies; and
- 4) Contracts and Grants Accounting (CGA).

The funding cycle can be divided into three subprocesses, 1) Pre-Award administration; 2) Post-Award administration and 3) Award Closeout.



# Solicitation of Extramural Funding

At the University of California all awards must be made to The Regents of the University of California, not to Cooperative Extension offices, Research and Extension Centers, Statewide Programs, schools, colleges, or 4-H Councils. No proposal seeking funding for extramural support for research, training, or public service programs or projects may be made in the name of the University without prior approval of The Regents or an authorized officer of the University. At UC Agriculture and Natural Resources (ANR), the Vice President–Agriculture and Natural Resources (VP ANR) has delegated such authority, within the limits set forth by The Regents, to the director and staff within the Office of Contracts and Grants (OCG).

Proposals for extramural support must be submitted through the OCG via the [ANR Grant Tracking System \(GTS\)](#). This ensures that all extramurally funded projects conducted either by University employees or with the use of University resources or facilities have proper signature authority and comply with relevant University policies and guidelines. UC has put this policy in place to protect both the University and its academic employees.

The OCG assists Cooperative Extension, Research and Extension Centers, and Statewide Programs in their efforts to secure extramural funding and promote proper stewardship of those funds. When processing a proposal and the resulting award, the OCG reviews all documents to ensure that projects comply with relevant University policies and guidelines. OCG staff members are available to assist with questions relating to University policy and proposal preparation.

## Key Points

Extramural awards are made to The Regents of the University of California.

At ANR, the Office of Contracts and Grants (OCG) is the authorized office to submit proposals for extramural funding.

PI's submit proposals to OCG via the ANR [Grant Tracking System \(GTS\)](#).

### Whom to Contact

[ANR Office of Contracts and Grants](#) website to find your assigned analyst. For general questions [email OCG@ucanr.edu](mailto:OCG@ucanr.edu)

### Additional Information

[ANR Administrative Handbook](#), Section 264 – Contracts and Grants for Research, Training, and Public Service Projects

[Policy on the Requirement to Submit Proposals and to Receive Awards for Grants and Contracts through the University \(systemwide policy\)](#)

# Eligibility to Serve as Principal Investigator

The individual responsible for the design, scientific conduct, administrative conduct, and reporting of a research, training, or public service project supported by extramural funding is known as the Principal Investigator (PI) or Project Director (PD). The PI must personally participate in the project to a significant degree.

The eligibility criteria to serve as a PI is different for UC campus faculty than for ANR. For ANR county and statewide program-based academics, the following job titles are eligible to be designated PI on a project:

- Cooperative Extension Advisor series
- Director, Research and Extension Center
- Director, Statewide Program
- Cooperative Extension Specialist Series

Retirees in these job titles who are granted emeriti status retain the PI eligibility that they held prior to retirement.

Individual exceptions to the PI eligibility policy may be permitted with AVP approval. Exceptions are approved on a case-by-case basis, and most are valid only for a limited period of time. Please see the [Request for Exception to Policy on Eligibility](#). Please complete the form and submit to [OCG@ucanr.edu](mailto:OCG@ucanr.edu).

PI eligibility for campus faculty member must work at least 50 percent in any combination of the following six appointments:

- Member of the Academic Senate
- Appointee in the Agronomist series
- Appointee in the Adjunct Professor series
- Appointee in the Clinical Professor series
- Appointee in the Professional Researcher series
- Appointee in the Cooperative Extension Specialist series

The same eligibility requirements apply to a Co-Principal Investigator.

## Key Points

Eligibility to serve as a PI is limited to certain appointments.

Exceptions to PI eligibility requirements must be endorsed by a director and approved by the Vice President–Agriculture and Natural Resources.

### Whom to Contact:

Questions about PI eligibility and exceptions may be directed [to OCG](#).

Additional information on [PI eligibility](#) is available on the OCG website.

**Additional Information:** [ANR Administrative Handbook](#), Section 264 – Contracts and Grants for Research, Training, and Public Service Projects

# Code of Conduct Compliance

## Conflict of Interest

A Conflict of Interest (COI) is a situation in which an investigator's **outside financial interest(s) or obligation(s) (real or perceived) have the potential to bias a research project or cause harm to human subjects** participating in a research project. "Financial interest" is defined as any personal benefit of significant monetary value, including, but not limited to

- Salary or other payments received for services
- Equity interests, such as stocks, stock options, or other ownership interests
- Intellectual property rights, such as patents, copyrights, and royalties from such rights, other than royalties received through the University
- Appointment to a position as an officer, director, agent, or employee of a business entity

Rules regarding conflict of interest apply to all investigators (PI and otherwise) on the project as well as to their spouses, domestic partners, and dependent children.

On projects sponsored by private-sector organizations, any financial interest in the sponsor that occurred within 12 months prior to the date of the funding offer or during the project timeframe constitutes a potential conflict of interest.

University policy prohibits academics, staff, managers, or officials from engaging in any activities that create a conflict of interest between official University activities and any personal interest or obligation. Because conflicts of interest can arise during an individual's interactions outside the University, the presence of an actual, apparent, or perceived conflict of interest does not automatically constitute wrongdoing. However, any potential conflicts of interest must be disclosed and managed.

The University has a formal procedure for doing so in compliance with federal and state regulations. It requires investigators to:

- Disclose their financial interests and the interests of their spouse/domestic partner and dependent children on the appropriate disclosure form(s)—[Form 700-U](#) for privately sponsored projects and [Form 800](#) for federally funded projects. For PHS or DOE flow-through projects, investigators must also complete the required [PHS/DOE COI forms and training](#) (Visit the [OCG website](#) for more information)
- Provide updates as the amount and nature of financial interest changes during the period of performance of supported research. This policy is intended to protect investigators, their sponsored research and other educational and professional activities in which they are engaged, and the University.

## Human subjects and Conflict of interest

Research involving human subjects poses special concern regarding conflict of interest. For example, the research may involve drugs, equipment, materials, or methods in which the investigators, their domestic partner, or their dependent children have a financial interest. Such interests may appear to compromise the rights and wellbeing of the research subjects as well as the integrity of the related research and therefore must be disclosed. For this reason, potential conflicts of interest in research with human subjects are subject to particularly careful scrutiny. Disclosure of conflicts of interest related to research including human subjects is included in the Institutional Review Board procedures for each campus, accessible online [at https://irb.ucdavis.edu/](https://irb.ucdavis.edu/)

## Use of the University or ANR name, image, brand, and logo

Association of the University of California or ANR name, image, brand, or logo with commercial interests may lead to a conflict of interest. For example, while consulting or research, ANR academics may provide professional evaluations of products or services, but care must be taken to avoid identifying the University with the academics' opinions or conclusions in any public or private reports that may support their own outside financial interests. Academics must also avoid implying an endorsement on the part of the University or ANR.

### Key Points

PIs and Co-PIs may not have or appear to have any personal financial interest in a research project.

ANR academics, staff, managers, or officials shall not engage in any activities where there is a conflict of interest between their official University duties and any other obligation. This policy applies to investigators and to their spouses, domestic partners, and dependent children.

Any potential conflict of interest must be disclosed.

Any association of the UC or ANR name, image, brand, or logo with commercial interests in the public eye may lead to a conflict of interest.

### Whom to Contact

Questions about conflict of interest may be directed to: the Director of the ANR OCG or the Director of Administrative Policies and Business Contracts

### Additional Information

\* [Office of the President Ethics, Compliance, and Audits](#)



## Conflict of Commitment

A Conflict of Commitment refers to situations where an employee's outside professional activities may interfere with their responsibilities to the University. Employees are expected to disclose their outside activities and obtain approval if those activities could potentially interfere with their university responsibilities. Conflict of commitment is addressed through UC's policies, which outline expectations for managing external commitments that might interfere with university responsibilities.

Sponsor required "Other Support and Current & Pending form" information is used, in part, to assess any conflicts of commitment that may impact the ability of the individual to carry out the research effort as proposed. Disclosures include all resources made available to a researcher in support of and/or related to all their research endeavors. This includes, but is not limited to, research grants, cooperative agreements, contracts, internal UC ANR awards, outside consulting research agreements, and in-kind contributions. Resources must be disclosed regardless of 1) whether or not they have monetary value, and 2) whether such support is provided through the University, through another organization, or is provided directly to an individual that supports the senior/key personnel's research efforts.

### Key Points

A Conflict of Commitment occurs when outside activities interfere with University responsibilities and must be disclosed under UC policy.

Sponsors require disclosure of all current and pending support to assess whether external commitments affect an individual's ability to perform the work

#### Whom to Contact

Questions may be directed to: the Director of the OCG or the Director of Administrative Policies and Business Contracts

## Responsible Conduct of Research (RCR)

Research integrity is critical for research excellence, public trust and to prepare future scientists. As required by federal regulations, institutions receiving federal research funding from USDA NIFA, NSF, or NIH must establish policies that prevent and address research misconduct, protect whistleblowers, and promote responsible conduct of research. UC ANR has made provisions to provide such training online through [CITI Program](#).

For projects funded through the U.S. Public Health Service, institutions and principal investigators must also formally certify the integrity of their research.

### Who Must Complete the RCR Training

All ANR Advisors are required to complete this training because of the USDA NIFA capacity grant funding the university receives.

In addition, all project directors, faculty, undergraduate students, graduate students, postdoctoral researchers, as well as any other staff participating in a USDA NIFA funded project or capacity grant are required to take this training. On NSF supported projects, all faculty, senior personnel, undergraduate students, graduate students, and postdoctoral researchers are required to take this training. On NIH supported projects, all trainees, fellows, participants, and scholars receiving support through any NIH training, career development award, research education grants, or dissertation research grants are required to take the training.

The **project PI bears responsibility** for ensuring that applicable project staff on USDA NIFA, NSF, or NIH awards have completed this training, including any new hires or personnel changes that occur after the award is made.

ANR requires this training to be completed within 60 days of receiving the Training Requirement Notice or starting work on a USDA NIFA, NSF, or NIH funded project and must be renewed every 3 years.

### Key Points

Federal regulations require institutions to have policies for preventing misconduct, protecting whistleblowers and ensuring responsible conduct of research. Compliance applies to all USDA NIFA, NSF, and NIH projects.

CITI Program RCR Training must be completed within 60 days of receiving the training notice or starting work on a USDA NIFA, NSF, or NIH funded project.

The **Project PI must ensure** that all required personnel — including new hires or staff added after award — complete the training on time and remain current, upholding UC ANR's commitment to research integrity.

#### Additional information:

[Responsible Conduct of Research](#) OCG website.

Responsible Conduct of Research [CITI program registration instructions](#)

## Research Security

Research Security is broadly defined as “safeguarding the research enterprise against the misappropriation of research and development to the detriment of national or economic security, related violations of research integrity, and foreign government interference.” It refers to the protection of sensitive research data, intellectual property, and scientific discoveries from theft, interference, or exploitation by unauthorized entities.

### Required Compliance Trainings:

- *Ethics and Compliance Briefing for Researchers* training ([UC Learning Center](#))
- *Research Security at the University of California* training ([UC Learning Center](#)).

Research Security Training under NSPM-33 requires that all applicable federally funded researchers complete research security training and receive insider threat training. Covered Individuals who plan to apply for new funding from the specified agencies must complete the training prior to proposal (application) submission.

**Failure to complete this required training could impact your proposal / application from being submitted** or delays in accepting new awards.

Research security training requirements and definitions of Covered Individuals vary by Federal agency. See the [OCG Research Security website](#) for requirements.

### Disclosure Requirements

UC ANR researchers must provide accurate and detailed disclosures of foreign affiliations, funding, and participation in foreign talent programs. This transparency helps the government assess potential risks. Failure to transparently disclose foreign engagements in current and pending support and biosketches can have serious consequences. These disclosure requirements apply to:

- Participation in [Foreign Talent Recruitment Programs](#)
- [Malign Foreign Talent Recruitment Programs \(MFTRP\)](#)
- Research Disclosures
  - Conflicts of Interest (including financial conflict of interest)
  - Conflicts of Commitment
  - Current and Pending Support
- Foreign Financial Transactions and Agreements

### Key Points

Research Security protects sensitive research and intellectual property from foreign interference and misuse.

Researchers must complete the security training before proposal submission.

Full disclosure of foreign affiliations, funding, and related activities is mandatory.

**Additional information:** Additional information on the [OCG Research Security website](#).

# Export Control

Export control laws govern the international shipment or transmission of certain controlled or sensitive physical items, technology, information or software as defined by the U.S. State Department International Traffic in Arms Regulations (ITAR) and the U.S. Commerce Department Export Administration Regulations (EAR). These laws also apply to “deemed exports” where there is a “release” or sharing of export-controlled information or technology to any foreign national in the United States, which may include individuals working at ANR in your lab or facility.

Export control laws can potentially apply to ANY shipment, transmission, or transfer of your research-related physical items, information, or software outside the United States. Depending on the type of item or technology and country involved, the U.S. government may require an export license prior to transferring certain items to certain countries, foreign nationals, or entities, even within the U.S.

The Federal Government can (and has) impose serious criminal and civil sanctions against institutions, entities, and individuals who violate export control rules. ANR and its employees must exercise due diligence in complying with U.S. export control laws while preserving one of the UC’s core values, openness in research.

For more specific information please watch the brief video that provide an overview of export control rules generally, [University General Export Control Video](#).

## The Fundamental Research Exclusion (FRE)

ANR is excluded from the “deemed export” rules under the Fundamental Research Exclusion (FRE) if certain criteria is satisfied. The FRE generally only applies to research results and only when such results are ordinarily published and shared with the scientific community. To qualify under the FRE, the research must:

- Be free of any publication or access restrictions, and
- Not restrict foreign national participation.

Additionally, the Fundamental Research Exclusion does not apply to:

- Physical goods, the actual physical export (e.g. shipment or transmission) of control items, data, or information outside the United States)
- Software
- Encryption
- Research when there is no intention to publish the results
- Some research conducted out of the United States

### Key Points

Laws regulate the transfer or sharing of controlled items, technology, software, or information with foreign entities or foreign nationals, including within the U.S.

Some transfers require licenses; violations can lead to serious civil and criminal penalties.

The FRE applies to open, publishable research without restrictions but does not cover physical exports, software, or encryption.

**Additional information:** Export control training on [the OCG website](#).

# Fiduciary Compliance

## Award Terms and Conditions

It is critical that the PI review and understand the contract or grant requirements and restrictions of each specific award. **If any of the award terms are unclear, it is the PI's responsibility to contact the OCG for clarification and guidance.** If the terms of an individual award are more strict than federal guidelines and University policy, the terms of the award take precedence. For example, travel expenses are allowable under University policy but may be excluded or limited by your specific award.

Some important terms and conditions to be considered when managing an award include the following (*not meant to be all-inclusive*):

### Budget

The PI prepares a project budget and justification for the project. The budget must be in accordance with allowable costing principles and must include the appropriate indirect costs (also known as Facilities and Administrative [F&A] costs) rate. As the project progresses, the project budget should be compared on a regular basis to actual expenditures. Standard university budget categories are

- Salaries/wages
- Benefits
- Supplies and other expenses
- Travel
- Equipment (as defined by University policy)
- Subawards
- Indirect costs

Before rebudgeting the project, the PI should consult the terms and conditions of the award to determine whether prior approval is required. Depending on the sponsor's award terms and the specifics of the proposed budget revision, prior approval from the sponsoring agency may be required. Requests to the sponsor prior approval to rebudget should be submitted through the OCG.

### Performance period

Expenses must be incurred during the performance period set forth in the terms and conditions of the award. Expenses incurred after the end of the performance period are not allowable. If the PI believes he or she will not be able to complete a project by the end date of the project period, he or she should submit a request for a no-cost extension to the sponsor, through the OCG. The award may indicate a specific timeframe for submission of the request.

## Other project modifications

Non-exhaustive list of modifications that may require prior sponsor approval:

- Change in PI or other key personnel
- Transfer of PI to another institution
- Change in scope of work or project work plan
- Out-of-state or foreign travel
- Purchase of equipment not initially requested and approved in budget
- Carry-forward of remaining funds to subsequent budget period

Any requests for prior sponsor approval should be submitted through the OCG.

## Spending before an award is fully executed

Spending prior to notification of a fully executed award is generally discouraged. However, there are situations where funding is delayed and the project is ready to commence. If a delay in funding is anticipated, an advance expenditure authorization may be requested through the BOC, SWPR, or your unit Business Manager. The PI and his or her director must guarantee that if the proposal is not awarded all pre-award expenses will be funded by the unit. Once these approvals have been obtained, the request will be forwarded to OCG for review and approval.

## Program income earned as a result of an extramural award

If it is anticipated that the program will realize income as part of a project proposed for funding, this expectation should be disclosed in the proposal. Program income is defined as gross income earned by an award recipient that is directly generated by a supported activity or earned as a result of the award. Examples include fees from services performed or registration fees for conferences sponsored by an award. All program income and related expenses must be reported to the agency along with the award financial activity.

## Project reporting

The PI should read the award terms and conditions closely to determine what technical or programmatic reports, report deadlines, report format, and method of submission are required. Award close out and final reporting are also discussed in this document, under *Project Reports*.

### Key Points

The PI is responsible for adhering to the agency expectations as detailed in the award.

The PI should review every award for specific restrictions such as those pertaining to rebudgeting and unallowable expenses.

Requests to the sponsor for prior approval should be submitted through OCG.

**Whom to Contact:** For questions about award terms and conditions contact [OCG](#). For questions about the budget: your account manager

**Additional Information:** \*Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, [2 CFR 200](#); \*[UCOP Contract and Grant Manual](#), Chapter 2



## Administrative Costs

Salaries and wages of administrative and clerical staff should generally be treated as indirect costs and included in departmental administration. Directly charging such costs to a contract or grant may be appropriate when the project requires an extensive amount of administrative or an amount of clerical support significantly greater than what is routinely provided by the administrative unit. The costs must be attributable to the project and the circumstances must be justified in the project proposal to the satisfaction of the awarding agency.

Administrative or clerical costs may be charged if all of the following conditions are met:

- Administrative or clerical services are integral to a project or activity;
- Individuals involved can be specifically identified with the project or activity;
- Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency; and
- The costs are not also recovered as indirect costs.

The following types of administrative and clerical activities are considered indirect. They should not be charged to sponsored projects because they cannot easily be directly identified with specific projects

- Administration and support services that span multiple administrative unit activities
- Contracts and grants analysis
- Personnel functions
- Accounting and budgeting functions
- Routine travel planning
- Processing and tracking of routine purchase orders

The development and preparation of proposals, including typing, data entry, photocopying, scanning, and mailing, are unallowable costs and should not be charged to a sponsored project.

### Key Points

Salaries and wages of administrative and clerical staff should generally be treated as indirect costs.

Charging administrative expenses to a project may be allowable with sponsor approval in some circumstances when all the required conditions are met. Such integral administrative expenses must be identified in the proposal budget and supported by a written justification.

#### Whom to Contact

Unit Business Manager, Business Operations Center account manager, or [OCG](#).

#### Additional Information

[UCOP Contract and Grant Manual](#), Chapter 7, Budget and Expenditures (systemwide policy)

[Proposal Budget Handbook \(UC Davis policy\)](#)

Uniform Administrative

Requirements, Cost Principles, and Audit Requirements [2 CFR 200](#)

## Cost Principles

ANR and its PIs are jointly responsible for the stewardship of extramural funds in compliance with federal cost principles established by the federal Office of Management and Budget (OMB). These principles are outlined in Title 2 of the Code of Federal Regulations, Part 200 ([2 CFR 200](#)) and are incorporated into University policies and procedures.

Adherence to all cost principles is required for proper and appropriate accounting for the expenses of conducting extramurally funded activities at ANR. The consequences of failing to comply with costing principles may range from disallowance of specific incurred costs by the sponsor, to termination of the award, to federal sanctions, depending on the cost and circumstances in question.

### Allowable costs

The key concept of the cost principles is “allowability.” For a cost to be allowable on a sponsored award, it must be Reasonable, Allocable, Consistently treated.

- **Reasonable cost.** It is necessary for the performance of the project and is within what a “prudent person” would pay for the particular goods or services.
- **Allocable cost.** The project that pays the cost is the project that benefits from it. Expenses shared across multiple projects benefit all projects proportionately (when benefit can be clearly allocated) or reasonably (when proportionate value cannot be readily determined due to the interrelationship of the work involved).
- **Consistently treated cost.** The University consistently designates that type of cost as either direct or indirect when incurred for the same purpose in like circumstances.

Additionally, the cost must not be explicitly excluded under 2 CFR 200 or the terms or conditions of the award. Some expenses that may directly benefit a project may still be prohibited by the award sponsor and therefore not allowable on the award.

### Key Points

All personnel, including PIs, who initiate or approve financial transactions on UC accounts must be familiar with UC cost principles, especially the concept of allowable costs.

**Allowable costs must be:** Reasonable, Allocable, Consistently treated and Not explicitly excluded under [2 CFR 200](#) or the terms and conditions of the award

Noncompliance with cost principles may result in disallowed costs, award termination, or federal sanctions.

#### Additional Information

[Business and Finance Bulletins: A-47, University Direct Costing Procedures](#) (systemwide policy)

Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, [2 CFR 200](#)

[UCOP Contract and Grant Manual](#), Chapter 6, Financial – General (systemwide policy)

## Cost Sharing

Cost sharing is the portion of the project expenses provided (“matched”) by the University and not paid by the sponsoring agency. Shared costs are typically direct costs of the project and are paid from ANR funds as a cash match or are provided by a third party as an in-kind match in support of the project.

There are three types of cost sharing:

- Mandatory cost sharing. Costs that the university must contribute toward the project in order for an award to be made.
- Voluntary committed cost sharing. Costs associated with a project and identified in the proposal, for which sponsor funding is not being requested.
- Voluntary uncommitted cost sharing. Any cost associated with a project and not funded by the sponsor, which has not been identified in the proposal, or in any other communication to the sponsor as a university commitment.

If cost sharing is mandatory, this will be listed as a condition of the award in the request for proposals issued by the awarding agency. Cost sharing should only be offered by the University if it is a condition of receiving the award. According to the Uniform Guidance ([2 CFR 200](#)), voluntary committed cost sharing cannot be used as a factor during the merit review of proposals. UC ANR strongly discourages cost sharing unless such a commitment is required by the sponsor.

The cost-shared amount must be disclosed to the sponsor in the proposal. This constitutes a promise that the University will provide funds in support of the project and will not charge the sponsor for those costs. Once an award is made, the cost sharing offered to the sponsor and documented in the proposal documents becomes a binding commitment. Failure to fulfill the cost sharing obligation at the proposed level may result in reduction of the amount of the sponsor’s award.

Per federal regulations, costs eligible for cost sharing must be

- Readily verifiable in the University’s records and documented in writing, if provided by a third party
- Necessary and reasonable for the proper and efficient accomplishment of project or program objectives
- Allowable under applicable cost principles
- Not paid by another federal award, except as authorized by statute
- Provided for in the approved budget when required by the federal awarding agency
- Incurred within the performance period of the award

### Tracking, reporting, and certifying cost sharing

The PI, unit Business Manager, BOC, SWPR and Contracts and Grants Accounting staff share responsibility for tracking, reporting, and certifying cost-shared expenses.

## At the time of proposal:

The PI prepares a cost share pledge by:

- Clearly documenting cost sharing in the proposal budget or budget justification
- Leaving any discussion of cost sharing out of any other proposal text
- Submitting all signed documentation with the proposal package to OCG for review and approval
- Signed documentation from each funding source that has promised to contribute includes:
  - If the contribution is from the University: OCG will request approval from the Associate Vice President for Research and Cooperative Extension. If approved, OCG will prepare a cost share commitment letter if required by the sponsor.
  - If the contribution is from a third party: the PI must obtain a letter of commitment from the contributor and it must be on the contributor's letterhead.
- Unfunded collaborations with any quantifiable cost share commitments must also be routed through OCG to obtain University approvals and a signed commitment letter. PIs do not have delegated authority to commit cost share on behalf of the University.

## After the award:

The BOC, unit Business Manager, or SWPR is responsible for recording and tracking cost share expenses. The PI is responsible for reviewing and certifying cost share reports to ensure that all cost share contributions are captured correctly and that all cost sharing obligations are met in a timely manner.

Notify OCG immediately if there is any possibility that a cost sharing commitment will not be fulfilled as the sponsor may hold ANR responsible for fulfilling all, or a proportionate share, of any cost sharing commitment associated with the project.

The PI and/or the BOC, SWPR, or unit Business Manager must submit cost share contribution reports, signed by the PI, to Contracts and Grants Accounting for submission to the sponsor in accordance with the reporting terms defined in the award agreement.

### Key Points

Cost sharing is discouraged by the university unless it's a mandatory requirement.

On federal projects, voluntary costs share cannot be used as a factor during the merit review process.

The PI is responsible for identifying and securing the appropriate sources for cost sharing and the BOC or unit Business Manager assists with tracking and reporting of the costs.

**Whom to Contact:** At time of proposal: [OCG](#); At time of award, your account manager.

**Additional Information:** [UCOP Contract and Grant Manual](#), Chapter 5; Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, [2 CFR 200](#)

## Expense Categories to Watch

The following expense categories are frequently misunderstood. These costs are scrutinized by federal agencies, and great care must be taken to ensure that, when directly charged to a sponsored project, such costs directly benefit the project.

**Before approving any expenses in the following categories, check University policy and the terms and conditions of the award to ensure that the expenses are allowable.**

### Proposal preparation costs

Costs of preparing proposals and applications for acquiring sponsored funding, including copying, mailing, long distance telephone charges, etc., are not allowable.

### Food

Food (meals and refreshments) is generally not allowable as a charge to a sponsored project unless specifically identified in the proposal budget and approved by the sponsoring agency (e.g., meals for a meeting). Meal costs incurred during the course of travel generally are allowable. Food purchased for demonstrations or approved activities may be allowable if specifically identified in the proposal budget and approved by the sponsoring agency. The rules for allowability and unallowability of food expenses are included in UCOP UC [Business and Finance Bulletin BUS-79](#), Expenditures for Entertainment, Business Meetings, and Other Occasions.

### Administrative salaries and expenses

Salaries and wages of administrative and clerical staff in general should not be direct charged to a project. However, administrative costs may be charged if all of the following conditions are met:

- Administrative or clerical services are integral to a project or activity;
- Individuals involved can be specifically identified with the project or activity;
- Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency; and
- The costs are not also recovered as indirect costs.

Directly charging such costs to a contract or grant may be appropriate when the project requires an extensive amount of administrative or an amount of clerical support significantly greater than what is routinely provided by the administrative unit. The costs must be attributable to the project and the circumstances must be justified in the project proposal to the satisfaction of the awarding agency.

### Equipment

Equipment is defined by the federal government and the University as tangible, nonexpendable property having a useful life of more than one year and an

acquisition cost of \$5,000\* or more per unit (including tax, shipping, and installation). However, when the terms of an award set a lower dollar threshold for equipment—\$1,000, for example—the PI’s administrative unit must track it as if it fell under the University’s definition of equipment. (See UCOP Management and Control of University Equipment Policy, [Business and Finance Bulletin BUS-29](#))

\*The equipment threshold value increased to \$10,000 per [2 CFR 200](#), however, for UC ANR the acquisition threshold is \$5,000 per our current indirect cost rate agreement (NICRA) until its amended.

Important information to consider before purchasing equipment on a sponsored project:

- General-purpose equipment is unallowable as a direct cost, except with the prior written approval of the sponsor.
- If a piece of purchased equipment will benefit more than one sponsored agreement or activity, the cost should be distributed to all benefiting activities using a reasonable and documented method of allocation.
- Budgeted equipment is generally purchased at the beginning of a project unless the scope of work is such that the equipment is essential during a later period of performance. If the equipment purchase is to be made within 60 days of the award end date, a justification must be submitted to the BOC, SWPR or unit Business Manager for coordination, review, and approval by the OCG prior to purchase.
- Maintenance and repair costs to keep project-specific equipment—whether pre-existing or purchased with project funds—in operating condition are allowable within the timeframe of the project’s performance period. As with equipment purchases, if the maintenance agreement or repair cost benefits more than one sponsored agreement or activity, the cost must be allocated to the various projects and activities proportionally based on the benefit directly received by each.

## Travel

Before charging travel to an extramural project, PIs and their administrative staff should review all relevant travel policies— sponsor, program, federal, University, and ANR—and follow the most restrictive policy, noting any special requirements such as pre-trip approval. (See [UC Business and Finance Bulletin G-28](#), Policy and Regulations Governing Travel)

## Tuition Remission

Some sponsors do not allow student fees or tuition remission as a direct charge to projects. Campus-based Cooperative Extension Specialists should check their campus’s institutional policies and the award terms and conditions or agency guidelines if you are employing a graduate student on your project. For some campuses tuition remission may be a required benefit for all graduate student employees, and, if applicable, an alternate, non-restricted funding source such as

general funds or donations will need to be identified to pay these charges.

## Memberships and subscriptions

Memberships and subscriptions are normally considered to be indirect costs because their benefit to research and academic endeavors generally cannot be specifically assigned to individual awards. If memberships are required for attendance at a professional technical meeting related to the funded project, the membership cost may be allowable, provided it was specifically budgeted and justified in the project proposal.

## Office supplies, telecommunication charges, postage, and printing charges

Office supplies, postage and mailing costs, printing costs, and local telephone line charges (including cell phones) are normally treated as indirect costs. Costs that are specifically identifiable with a project may be directly charged.

## General-purpose computers, software, and computer supplies

General-purpose computers, office software, and computer supplies are normally considered indirect costs. Costs that are specifically identifiable with a project may be directly charged.

## Recharge activities and service centers

Costs of approved University rate and recharge activities and service centers are allowable as direct costs to a sponsored project where such costs are required under the scope of the project. All usage must be accounted for and services must be charged to all users based on actual usage, using uniform, nondiscriminatory rates. The rates must be based on the direct costs of providing the services. Rates must be approved within University policies and appropriately revised based upon review of the actual direct expenses and charges to users. Charging a fixed percentage or fee to all sponsored projects for a particular service (e.g., programmer time) is not allowable.

### Key Points

Proposal preparation, general administrative expenses, office supplies, and general-purpose equipment and computers are typically classified as indirect costs and may only be directly charged when expressly allowable and adequately justified

Equipment, maintenance, and food may be allowable if approved by the sponsor.

All costs charged to sponsored projects must clearly benefit the project, comply with sponsor and UC policies, and be properly allocated and documented.

**Additional information:** [2 CFR 200 Business and Finance Bulletin: G-28, Policy and Regulations Governing Travel](#)

[BUS-29, Management and Control of University Equipment](#)

## Cost Transfers

A cost transfer is the movement of an expense from one account to another. This may be necessary to correct an error, to move or split costs into accounts that did not exist when the original transaction was made. Transfers should be the exception, not the rule. Cost transfers must meet the guidelines for allowability, allocability, reasonableness and consistency. More stringent criteria apply when cost transfers are to be deemed allowable on federally funded projects.

With the knowledge and approval of the PI, cost transfers may be initiated by the BOC, SWPR, or by your unit Business Manager. All cost transfers on federally funded projects must meet the following conditions:

- **Timely:** Transfers must be recorded within 120 days of the month the original charge posted.
- **Justified:** The reason for the correction and allowability on the new account must be documented.
- **Documented:** The transfer must reference the original invoice, payroll, or disbursement supporting the charge.

A high number of cost transfers can imply that financial transactions are not being properly reviewed and recorded when originally incurred. For this reason, cost transfers are closely scrutinized by auditors to determine the reason for the correction and the allowability of the charge to the project.

### Initiating a cost transfer

It is appropriate to initiate a cost transfer only for the following purposes:

- To correct an erroneous recording.
- To record a change in the original decisions made as to the use of goods or services.
- To redistribute certain high-volume, low-value charges that may benefit several projects under the jurisdiction of the unit.
- To redistribute payroll costs based on the after-the-fact verification of effort reported through the University's Effort Reporting System.

### Key Points

Cost transfers should be rare exceptions, not regular occurrences.

Cost transfers must meet the rules for allowability for the account being transferred to.

Cost transfers are closely scrutinized by auditors.

Cost transfers must be approved, recorded timely, and fully justified and documented.

**Whom to Contact:** Business Operations Center or your unit Business Manager

**Additional Information:** [Business and Finance Bulletin; A-47, University Direct Costing Procedures \(systemwide policy\)](#); [UCOP Contract and Grant Manual](#), Chapter 7, Budget and Expenditures (systemwide policy); [UC Davis - Cost Transfers \(Expenditure Adjustments\)](#)



## Academic Cost Recovery

It is the policy of ANR to allow the inclusion of academic salary in grant application budgets. Principal Investigators and Co-Principal Investigators are encouraged to recover reasonable and appropriate salary support from grants and contracts proportionate to the function of the time and effort devoted to the project. All reimbursements for academic effort must be planned in the budget at the proposal stage. No retroactive application of salary and benefits recovery is allowed.

In recovering salary and benefits costs under sponsored projects, the principles of good faith and fair dealing require that proposals present a realistic estimate of the amount of time to be devoted to the project by University academics.

Salary recovery for individual proposed projects shall be approved through the normal submission mechanism, with the responsible principal investigator recommending (and administrator approving) a reasonable amount of effort to be charged to each extramural sponsored project. The maximum level of salary recovery will be affected by such things as matching commitments and funding sources. In general, the maximum level of salary recovery should not exceed 30 percent of total contract/grant activity of the principal investigator.

### Key Points

Academic salary may be included in grant budgets, and PIs/Co-PIs are encouraged to recover reasonable salary support proportionate to their effort; no retroactive recovery is allowed.

Effort must be realistically estimated and approved at proposal time, and generally should not exceed 30% of a PI's total sponsored activity.

**Whom to Contact:** At time of proposal: [OCG](#); At time of award: Your Account Manager.

## Effort Reporting

Effort reporting is the documentation of time spent working on a federally funded project. Effort reports demonstrate that the amount charged or cost-shared on an extramural award is accurate. Effort is reported for all employees whose salaries are charged directly to or cost shared on federal and federal flow-through funds.

As directed by the VP ANR, PIs and Co-PIs are required to commit a minimum of 1% effort for federal awards up to \$25,000 and 2% effort for awards of \$25,000 or more. This policy also applies to projects with flow-through funding. Some sponsors may require a higher minimum level of effort.

Any effort over and above what was originally specified in the project proposal need not be tracked, reported, or certified.

Effort reports show the percentage of time an individual spends on a funded project. Therefore, an effort report must account for all of an individual's total institutional activities and the combined effort must always add up to 100 percent, regardless of the number of hours assigned to the funded project.

### Certifying effort

An effort report must be certified for each employee whose salary (or any portion thereof) is charged to a federally sponsored award and for each employee who has cost sharing commitments on the project.

PIs and others in academic and management classifications who are paid on federal or federal flow-through funds are required to certify their own effort. Effort for other employees must be certified by the PI or by some other responsible official. The certifier must have firsthand knowledge of the work performed and the amount of effort expended on that project.

For ANR employees paid through the UC Davis payroll system, general effort reporting and certification is conducted annually. At UC Berkeley and UC Riverside, effort reporting and certification for federally funded employees is conducted quarterly. The annual effort reporting period aligns with the federal fiscal year, October 1 through September 30. In conjunction, PIs are required to review expenditures monthly on their federally funded accounts.

In addition, the Agricultural Research, Extension, and Education Reform Act (AREERA) requires quarterly confirmation of effort expended. This quarterly confirmation of effort expended is initiated by ANR Financial Services

### Key Points

Effort reporting is required on federally funded projects.

Those who certify effort must have firsthand knowledge of the work performed.

**Whom to Contact:** BOC or your unit Business Manager.

**Additional Information:** Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, [2 CFR 200](#); [UCOP Contract and Grant Manual](#), Chapter 7,

## Developing and Monitoring Subrecipient Relationships

As the recipient of a prime award, ANR may collaborate with other entities, known as subrecipients, who carry out a portion of the project's scope of work. Subrecipients receive funding in the form of a subaward.

The PI should discuss any necessary outside providers with the OCG. It is important to determine at the proposal stage whether the relationship with the outside provider will be considered a subaward or a procurement transaction.

If the relationship is appropriately characterized as a subrecipient relationship, the subawards will be processed by the OCG. Only the first \$25,000 of a non-UC subaward expense is subject to the ANR F&A charge. F&A charges are not assessed by the prime UC campus for expenses budgeted or incurred by another UC campuses. However, the F&A rate of the participating campus should be included as part of the budget for that campus.

Requests to issue a subaward to project collaborators, along with the agreed-upon scope of work and budget, should be submitted to the OCG. OCG initiates and issues all subawards on behalf of the University. Any contracts with vendors for services in support of the project are requisitioned through BOC or your unit Business Manager and are initiated and issued by the purchasing department.

Subrecipient entities must comply with all terms and conditions of the prime award. The PI is responsible for monitoring the subrecipient for compliance with award terms and for satisfactory performance including the completeness and acceptability of work performed, reasonableness of expenditures, and fulfillment of cost sharing commitments.

Subawards are monitored using one or more of the following mechanisms:

- *Reporting.* Review of sub's submitted financial and performance reports
- *Contact.* Regular contact with subs about program activities and progress
- *Invoice review.* Invoices must be approved by the PI prior to payment

If the PI has questions regarding changes to the subrecipient or changes in the project scope of work, he or she should contact the OCG for assistance.

### Key Points

Subrecipients are entities that participate in carrying out a portion of the project's scope of work and receive funding via a subaward. Before submitting a proposal, determine whether the relationship qualifies as a subaward or a vendor.

The terms and conditions governing the relationship will differ depending on whether the provider is a subaward recipient or a vendor.

The PI is responsible for monitoring the performance of the subrecipient.

**Whom to Contact:** [OCG](#).

**Additional Information:** Uniform Administrative Requirements, Cost Principles, and Audit Requirements Subrecipient and contractor determinations., [2 CFR 200.331](#)

## Project Reports

The PI is responsible for submitting required interim and final project reports to the sponsor. Report requirements are spelled out in the award and may include:

- Identification information (project title, grant or contract number, PI contact information, period of performance)
- Significant results of the project
- Project difficulties and solutions
- List of publications resulting from the project, including articles in progress
- A discussion of “milestones” and “deliverables”

OCG monitors compliance with all final contract and grant reporting requirements. For federally sponsored projects, required reports generally include the following:

### Final technical or project report

The PI is responsible for submitting the required final technical or project report to the sponsoring agency. Evidence that the report was submitted should be provided to the OCG (i.e., transmittal letter or e-mail).

### Final financial report

UCD Contracts and Grants Accounting Office prepares and submits the final financial report to the sponsoring agency as required by the award terms.

### Final invention report

The PI submits final invention reports to the OCG, which submits final invention reports to sponsors. The report describes any new technology developed with support from the award, whether or not it has been disclosed to the Office of the President Office of Technology Transfer.

### Final equipment inventory report

Contact the BOC or SWPR for guidance or assistance with preparation of an equipment inventory report, which will be submitted by OCG to the sponsor.

### Key Points

Complete and accurate reporting per the reporting schedule associated with each award is the responsibility of the PI. Sponsors can and do suspend funding in cases in which progress reports or final reports are not submitted in a timely fashion.

Check with the sponsor for report formatting requirements and deadlines.

### Additional Information

Performance and Financial Monitoring and Reporting, [2 CFR 200.328 and 329](#)

# Health and Safety Compliance

## Projects Involving Human Subjects

UC has both legal and ethical obligations to ensure that human subjects used in projects are treated responsibly.

Federal regulations (Common Rule 45 CFR 46) and University policy require that a campus Institutional Review Board (IRB) review and approve all projects that involve human subjects before any human studies are begun. This includes projects related to the investigation of behavioral, sociological, and nutritional studies, as well as imaging, questionnaires, interviews, and other procedures.

All personnel, including ANR academics and staff, who participate in studies that involve human subjects must successfully complete an IRB training course. In addition, all studies approved by the IRB require continuing review.

Failure to ensure that a project is reviewed and approved by the IRB timely will lead to the suspension of the project and of any grants related to the study.

Prior to beginning a study that involves human subjects,

- Apply to the IRB for review and approval through [IRBNet](#). This requirement applies to all projects, even when federal regulations exempt certain research from full institutional board review.
- Complete the online Human Subjects Training Course approved by the IRB. This requirement applies to PIs, Co-PIs, student investigators, study coordinators, visiting scientists, consultants, laboratory technicians, and all assistants who will have direct contact with human subjects of research. Training must be renewed as determined by the IRB. The PI is responsible for ensuring project compliance with training requirements.

Information regarding the separate campus (UC Berkeley, UC Davis, and UC Riverside) IRBs, project review and approval processes, and training requirements is available online. UC ANR utilizes the [UC Davis IRB](#) for the review and approval of human subjects research projects.

### Key Points

UC ANR utilizes the UC Davis IRB for the review and approval of human subjects research projects. Other campus-based CE Specialists may use their campus's IRB office.

An IRB must review and approve any project that involves human subjects before the project can commence, even if federal regulations permit certain projects to be exempt from full IRB review.

Human Subjects Training is required for most project personnel prior to the conducting of projects that involve human subjects.

**Whom to Contact:** [UC Davis IRB Office](#)

## Projects Involving Vertebrate Animals

All projects, teaching, or testing that involves the use of vertebrate animals must be approved by a campus Institutional Animal Care and Use Committee (IACUC) before the activities are performed. Any significant changes to a project must be approved by the IACUC in advance of implementation.

The IACUC can assist PIs in compliance with all applicable federal, state, local, and institutional regulations regarding animal care and use. An approved Animal Care and Use Protocol must be in place before the project can be initiated

Prior to beginning a study that involves animals, you must

- Submit a protocol to an IACUC for approval
- Complete the campus-specific animal care training
- Participate in the campus-specific Occupational Health program, as required
- Animal projects at Hopland and Sierra Foothill Research and Extension Centers require approval by the REC-specific Animal Research Committee.

Information regarding the separate campus (UC Merced, UC Berkeley, UC Davis, or UC Riverside) and REC committees, project review and approval processes, and training requirements is summarized online (<https://ucanr.edu/site/anr-environmental-health-safety/vertebrate-animal-information>).

Projects that encompass handling of or physical interaction with wild vertebrate animals, including amphibians, reptiles, fish, birds, and large and small mammals, require approval by a campus IACUC.

### Key Points

ANR utilizes the IACUC of the UC Merced campus. Campus-based CE Specialists at UC Berkeley, UC Davis, and UC Riverside use their campus's IACUC office.

An IACUC must review and approve all projects and teaching exercises that involve the use of vertebrate animals before project begins.

Training is required for most project personnel before human or animal projects can be conducted.

Link to a [table summarizing the project review and training requirements for the campuses and RECs](#).

**Whom to Contact:** [ANR Environmental Health and Safety](#)

## Fieldwork

Field projects and outdoor activities shall be planned in a way that incorporates measures and controls intended to reduce adverse exposure to a variety of natural hazards and conditions, including heat illness, cold stress, animals, plants, terrain, weather, water, and fire.

Heat illness planning is required for work that is scheduled to take place outdoors during the warm season and must include the development of a written Heat Illness Prevention Plan as shown in Appendix H of the [Injury and Illness Prevention Program \(IIPP\)](#)

Planning for other natural hazards and conditions must include

- Identification of hazards
- Monitoring for severe weather conditions
- Use of appropriate personal protective equipment
- Establishment of controls to eliminate or reduce hazards
- The carrying of an emergency communication device
- Task-specific safety and health training

ANR Risk and Safety Services has developed a variety of resources to help PIs identify and mitigate the hazards associated with fieldwork  
<https://ucanr.edu/site/anr-environmental-health-safety/fieldwork-safety-training>

### Key Points

Fieldwork and outdoor activities must be planned to reduce adverse exposure to natural hazards and conditions.

A written Heat Illness Prevention Plan must be developed for warm-season outdoor work.

#### Whom to Contact

[ANR Environmental Health and Safety](#)

#### Guidelines & Plans

[Fieldwork in Forested, Brush-Covered, Grassland, and Wetland Areas](#)

[Injury and Illness Prevention Program, Appendix H](#)

[ANR Safety Notes](#)

## Quarantined and Regulated Pests

Projects and activities associated with exotic pests (including insects, pathogens, plants, etc.) often require a permit from the California Department of Food and Agriculture (CDFA) and/or U.S. Department of Agriculture (USDA). Import of pests, soil, or certain plant materials from out of state or out of country also requires a permit from CDFA and/or USDA.

- When propagating, raising, or transporting plant pests that are subject to quarantine, use [Pest Exclusion Form 66-045, Application and Permit to Move and Use Plant Quarantine Commodities](#)
- When moving or using plant pests across county lines within the state, use [Pest Exclusion Form 66-026, Application and Permit to Move and Use Live Plant Pests or Insects or Noxious Weeds](#)
- When importing plant pests, soil, or plant materials from outside the state, there are various USDA forms to use depending on type of pest or quarantine status. [See the USDA website](#)

Read all permit conditions and procedures carefully and follow permit requirements. Distribute permit copies among all collaborators and staff working on the project and provide training to ensure they are aware of and adhere to permit requirements. If permit requirements do not match project protocols or if the project changes, work with the permitting agency to revise the permit.

### Training

ANR requires training for PIs and staff working on projects that involve quarantined or regulated pests (including insects, pathogens, plants, etc.). This training can be completed online at <https://ucanr.edu/site/plant-pest-regulations-and-permits/training>

### Key Points

Projects that involve the collection, transport, propagation, or raising of pests that are subject to quarantine or other regulation may require a state or federal permit.

When a permit is required, the PI must follow protocols, maintain records, and train project staff in accordance with the permit.

#### Whom to Contact

[ANR Environmental Health and Safety](#)

#### Additional Information

[ANR Plant Pest Regulations and Permits](#)

[Safety Note #146, Quarantined and Regulated Pest Permit Requirements](#)

[California Department of Food and Agriculture, Pest Exclusion Branch](#)

## Chemical and Pesticide Safety

All projects involving the use of hazardous chemicals in a laboratory setting require proper reporting of chemical and pesticide inventory, appropriate labeling, storage, and disposal, a written Chemical Hygiene Plan (including standard operating procedures), and staff training.

Projects involving the application of pesticides in greenhouse or field settings require reporting of pesticide use to the local Agricultural Commissioner, maintenance of a chemical and pesticide inventory, appropriate labeling, storage, and disposal, and staff training.

Additional requirements for the use of recognized chemical carcinogens also apply as appropriate.

All personnel working with chemicals or pesticides in a laboratory should receive training on the following subjects:

- *Laboratory safety.* Review [Safety Notes](#) #127 and #140 and/or Training Videos E-029 & E-075
- *Hazardous waste management.* Review [Safety Note](#) #056 and/or Project Leader Guideline for Laboratory Accumulation of Hazardous Waste.

Additional training must be provided for the specific chemicals, equipment, and processes used in the laboratory. [Additional ANR Laboratory Safety training resources can be found online.](#)

Campus-based personnel may also use the following campus-specific training courses:

- [UC Berkeley EH&S Website](#)
  - Laboratory Safety for New Laboratory Personnel
  - Hazardous Materials
- [UC Davis EH&S Website](#)
  - Chemical and Laboratory Safety
  - Hazardous Waste Management and Minimization
- [UC Riverside EH&S Website](#)
  - Laboratory Safety Orientation
  - Hazardous Waste Management

The safety of projects often comes down to a matter of individual behavior. All required protective clothing and equipment must be utilized when working with chemicals, including pesticides. Utmost care should be given to understanding and following correct material handling and equipment operation procedures and a zero-tolerance policy for lapses in sound safety practice should be enforced. This is critical to the prevention of injury, illness, and fatalities.

PIs and others responsible for chemicals, pesticides, and hazardous waste are required to self-audit chemical and pesticide use and storage on an annual basis and to maintain an inventory record of chemicals and pesticides. This self-audit process is designed to verify regulatory compliance and enable county inspectors to audit compliance. Facilities that store or use chemicals or pesticides in amounts that exceed threshold quantities need to register with their local Environmental Health Department (or Certified Unified Program Agency [CUPA]). Failure to comply with applicable regulations could result in fines levied against the PI.

## Key Points

Chemicals and pesticides used in projects must be properly labeled, stored, and disposed.

PIs must self-audit chemical and pesticide use and storage and must maintain an inventory record of chemicals and pesticides.

### Whom to Contact

[ANR Environmental Health and Safety](#)

### ANR Policies and Procedures

[Agriculture Worker Protection Standard](#)

[Experimental use of Pesticides](#)

[Pesticide Use and Handling](#)

[Project Leader Guidelines for Laboratory Accumulation of Hazardous Waste](#)

[Storage and Removal of Regulated Waste](#)

### ANR Guidelines

[Hazard Communication Program](#)

[Respiratory Protection Manual](#)

[Chemical Hygiene Plans](#)

[ANR Safety Notes](#)

[California Pesticide Information Series](#)

## Biosafety

A Biological Use Authorization (BUA) from a campus Institutional Biosafety Committee (IBC) is required for any project involving recombinant DNA or other biohazardous agents or materials. If the project includes animals, IACUC approval is also required, contingent on IBC approval.

Specific types of projects or operations that require a BUA include

- Work with biohazardous agents or materials that are pathogenic, infectious, or potentially infectious to plants, animals, or humans
  - Biohazardous agents include animals, plants, bacteria, viruses, Chlamydia, rickettsiae, parasitic/infectious protozoa, metazoan animal or human parasites, prions, certain toxins, and all viral vectors, in addition to other agents.
  - Biohazardous materials include cells, cell cultures, fluids, and tissues of animals or plants known or suspected to be infected with any microbial agent, parasite, or prion, and toxin-producing animals and plants maintained for the purpose of isolating or extracting toxins.
- Projects involving recombinant DNA technology, except those that are exempt under NIH Guidelines (exemption requests are reviewed and authorized by the IBC)
- Storage of biohazardous agents or materials that are not currently in use
- Class activities that entail potential exposure to biohazardous materials, such as laboratory exercises that involve the handling of pathogenic agents or the development of recombinant plants or animals
- Operation of core facilities where activities that involve biohazard exposure or regulated recombinant material take place, or where personnel may be exposed to biohazardous materials (clinical laboratory work is exempted, unless the laboratory is not covered under clinical laboratory quality assurance regulations)

Information regarding the separate campus ([UC Berkeley](#), [UC Davis](#), [UC Riverside](#)) committees, project review and approval processes, and training requirements are summarized online. The safety of projects often comes down to a matter of individual behavior. To avoid injury, illness, or fatalities, project participants must utilize all required protective clothing and equipment when working with biological agents. Utmost care should be given to understanding and following correct material handling and equipment operation procedures, and a zero- tolerance policy for lapses in sound safety practices should be enforced.

# ANR Contact Information

## Office of Contracts and Grants (OCG)

**Email:** [OCG@ucanr.edu](mailto:OCG@ucanr.edu)

**Website:** <https://ucanr.edu/site/office-contracts-and-grants>

**What we do:** The Office of Contracts and Grants (OCG) is the authorized organizational representative for all extramurally sponsored projects at UC ANR. We provide principal investigators assistance with proposal preparation and with resources and expertise so that they may better understand contract and grant administration and successfully administer sponsored awards.

## Business Operations Center (BOC)

**Email:** [bocsupport@ucanr.edu](mailto:bocsupport@ucanr.edu)

- Business Partner Team 1: [boc-uccepartner1@ucanr.edu](mailto:boc-uccepartner1@ucanr.edu)
- Business Partner Team 2: [boc-uccepartner2@ucanr.edu](mailto:boc-uccepartner2@ucanr.edu)
- Business Partner Team 3: [boc-uccepartner3@ucanr.edu](mailto:boc-uccepartner3@ucanr.edu)
- Business Partner Team 4: [boc-uccepartner4@ucanr.edu](mailto:boc-uccepartner4@ucanr.edu)
- Business Partner Team 5: [boc-uccepartner5@ucanr.edu](mailto:boc-uccepartner5@ucanr.edu)
- Business Partner Team 6: [boc-uccepartner6@ucanr.edu](mailto:boc-uccepartner6@ucanr.edu)

**Website:** <https://ucanr.edu/site/uc-anr-business-operations-center>

**What we do:** Provides comprehensive business and fiscal services to UC ANR staff across 80 county-based and programmatic units. Services include account and fund management, budget and financial analysis, personnel and expense transfers, post-award grants management, recharge and rate development, purchasing and invoicing liaison, Travel and entertainment, and cash management.

## Statewide Programs & Research and Extension Center Operations (SWPR)

**Website:** <https://ucanr.edu/site/statewide-programs-research-and-extension-center-operations>

**What we do:** Manages the budget, financial, personnel, programmatic and administrative operations for the program side of ANR. Units served include: ANR Senior Leadership, Statewide Programs and Institutes, Research and Extension Centers, Program Area Chairs, Program Area Teams and Workgroups, Academic Assembly Council, Endowed Chairs, Government and Community Relations, Program

Planning & Evaluation, Program Support Unit, Real Estate, Resource Planning & Management, Strategic Communications, and Workplace Inclusion and Belonging.

## Risk Services

**Email:** [risk@ucanr.edu](mailto:risk@ucanr.edu)

**Website:** Risk Services: <https://ucanr.edu/site/anr-risk-services>

**What we do:** Provides programs which protect academic members and ANR staff from unanticipated loss by: providing systematic risk analysis, developing techniques to reduce potential exposure to loss, administering ANR and University insurance programs. Contact Risk Services regarding questions on insurance, risk management policy, risk assessment, facilities use agreements, insurance claims, waivers, forms, certificates of insurance, GAEL, DOJ/FBI clearances, background checks, fingerprinting procedures, and DMV Pull Notice.

## Employee Health and Safety

**Email:** [ehs@ucanr.edu](mailto:ehs@ucanr.edu)

**Website:** <https://ucanr.edu/site/anr-environmental-health-safety>

**What we do:** Provide Environmental Health & Safety services to ANR employees, volunteers, and the public. Includes employee safety, training, ergonomics, laboratory safety, equipment safety, pesticide safety, industrial hygiene, respiratory protection, reporting injuries, environmental compliance, hazardous waste, and emergency planning.

## Policy, Compliance, and Programmatic Agreements

**Email:**

- General Inquiries: [PCPA@ucanr.edu](mailto:PCPA@ucanr.edu)
- Public Record Requests: [publicrecords@ucanr.edu](mailto:publicrecords@ucanr.edu)
- Agreement Inquiries: [newagreement@ucanr.edu](mailto:newagreement@ucanr.edu)

**Website:** <https://ucanr.edu/site/policy-compliance-and-programmatic-agreements/about-us>

**What we do:** The Policies, Compliance, and Programmatic Agreements (PCPA) office in UC ANR's Controller's office helps with policy, compliance, and programmatic agreements. We handle UC and ANR policy interpretation and development, delegations of authority, CANRA requirements, whistleblower reports, information practices issues (records requests/records management/subpoena/privacy), and act as a liaison to the Office of General Counsel. We also manage programmatic agreements

such as MOUs, real property, country support, researcher access, and internship program agreements. (Note: Agreements that involved Sponsored Projects, Non-Disclosure Agreements, Material Transfer Agreements, and Data Transfer Agreements are processed by the Office of Contracts and Grants.)

## Financial Services

**Email:** [financialcontrol@ucanr.edu](mailto:financialcontrol@ucanr.edu)

**Website:** <https://ucanr.edu/site/uc-anr-financial-services>

**What we do:** The Financial Services (FS) unit, part of the Office of the Controller, provides management and technical expertise to support financial operations of UC Agriculture and Natural Resources (UC ANR). We ensure UC ANR's financial activities align with: University of California policies, Accounting standards and reporting best practices, and External funding regulations and compliance obligations.

## Office of the Controller and Business Services

**Website:** <https://ucanr.edu/site/anr-employees/office-controller-and-business-services>

**What we do:** OCBS has responsibility for the following: Compliance, Risk and Control; Legal, Audit, and Investigative Matters; and Management of Policies, Compliance and Programmatic Agreements, Financial Services, and UCPath.

## Human Resources

**Email:** <https://ucanr.edu/site/uc-anr-human-resources/contact-us>

**Website:** <https://ucanr.edu/site/uc-anr-human-resources>

**What we do:** Strategic recruitment of staff and academic employees, ensuring competitive compensation, equal employment opportunity, and supporting employee and labor relations. Committed to hiring and developing skilled leaders, we collaborate with our partners to create a high-performing workforce, and a vibrant environment characterized by open communication, trust, and respect.