AGENDA

- IA Proposal & Export Review Tool: Highlights
- Faculty Export Program
- Service Center Employees as Key Personnel
- NSF Salary Limitations
- NIH Graduate Student Compensation Maximum
- Travel Services Update
IA Proposal & Export Review Tool: Highlights
STEP ONE: JPL PI INITIATES TASK REQUEST

Initiative IA Task Request
(to be entered by JPL Principal Investigator - JPI)

* Required fields

| Page 1 | Page 2 | Page 3 | Page 4 | Page 5 |

1. **Task Title**

```
Task Title field must be filled before you can save or go to other pages
```

2a. **Tracking Number**

*System Generated*

3. **Mod Number**
**Key Areas: Info that describes task**

- Allows JPL Export & Caltech Export with sufficient information to conduct export control review
- Determine whether or not an export license is required or exemption is available
- Makes CPI aware of his/her responsibility
  - Safeguarding Export Controlled data/items
  - Restrictions that apply
  - Technology Control Plan acknowledgement
Export Review

- Identifies what is export controlled & whether any controlled information or items will be transferred to campus:
  - Technical Data
  - Technical Assistance
  - Hardware & Software
  - Identify Foreign Persons working on export controlled tasks

- CPI has option to accept or reject an export controlled task

- Export controlled tasks will require provost approval
STEP TWO: CALTECH PI PROVIDES PROPOSAL, SUPPORTING INFORMATION & PROPOSAL

Interdivisional Authorization

PREPARE OR REVISE PROPOSAL AND SUPPORTING INFORMATION
(to be entered by Campus Principal Investigator - CPI)

* Required fields

Page 1 ✔️
Page 2 🔴
Page 3 🔴
Page 4 🔴
Page 5 🔴

GA Contact Information
Lorem ipsum dolor sit amet, consectetur adipiscing elit.

Full Phone Number:

Email:

OSR Grant Analyst Contact Information
Lorem ipsum dolor sit amet, consectetur adipiscing elit.

Full Phone Number:

Email:
Caltech PI – provides info re JPL & Campus Collaboration, Statement of Work

Interdivisional Authorization

Prepare or revise proposal and supporting information
(to be entered by Campus Principal Investigator - CPI)

* Required fields

✓ Page 1  I Page 2  ✓ Page 3  ✓ Page 4  ✓ Page 5

The information requested in this section (Questions 32-37) will assist JPL’s Office of Export Compliance (OEC) in making a determination as to whether or not the task will be export controlled and subject to the ITAR and/or EAR.

* 32. Will there be joint collaboration between Campus and JPL in the course of this work?
  
  ○ Yes
  ○ No

  Provide description of nature of collaboration (e.g., meetings, co-authoring papers, design, development, test or analysis)

* 33. Will the Campus work involve development of the following?

  a. Technology
     
     ○ Yes
     ○ No
CPI Indicates types of technical data, hardware & technical assistance

Interdivisional Authorization

PREPARE OR REVISE PROPOSAL AND SUPPORTING INFORMATION
(to be entered by Campus Principal Investigator - CPI)

* Required fields

Page 1 ✔ Page 2 ✔ Page 3 ✔ Page 4 ✔ Page 5 ✔

* 34. Will Campus need access to JPL technical data, hardware or software in addition to what JPL Principal Investigator (JPI) identified? If so, indicate:
  a. Technical Data
     ☐ Yes
     ☐ No
     Provide description

  b. Hardware
     ☐ Yes
     ☐ No
     Provide description

  c. Software
     ☐ Yes
     ☐ No
     Provide description
**Transfers to Caltech: Controlled Tech Data, Hardware & Tech Assistance**

**Interdivisional Authorization**

* Required fields

* 35. Will JPL need to transfer any of the following to Campus in order to perform the work described in this Statement of Work (SOW)?

a. Technical Data
   - Yes (Technical data will need to be brought to Campus)
   - No (Technical data will reside at JPL)
   
   Provide description

b. Technical Assistance
   - Yes (Technical assistance/meeting will occur on Campus)
   - No (Technical assistance/meeting will occur at JPL)
   
   Provide description
CPI IDENTIFIES FOREIGN PERSONS: WHAT IS THEIR ROLE? NEED EXPORT CONTROLLED ITEMS?

**Interdivisional Authorization**

* ENTER FOREIGN PERSON INFORMATION
  (to be entered by Campus Principal Investigator - CPI)

* Required fields

* 53. If a Foreign Person(s) has been requested by the Campus PI to work on this task, provide the following:

- Foreign Person Name (as stated on Passport)
  - First:
  - Middle:
  - Last:

- Foreign Person Nationality:

- Foreign Person Place of Birth:

- Country of Passport Issuance:

- VISA Type:

- Expiration Date:

- Does the Foreign Person have Dual Citizenship?
PROVOST APPROVAL REQUIRED FOR EXPORT CONTROLLED TASKS – ASSESS RISK

Interdivisional **Authorization**

**RECORD PROVOST APPROVAL**
(to be entered by Caltech Export Compliance - CEC)

* Required fields

---

Has the Campus Provost agreed that this research can be undertaken as **Export Controlled** (i.e., export controlled information, hardware, software, and/or defense services can be transferred to Caltech for this IA)?

- Yes
- No

Please provide information on rationale or conditions for this approval. The information you provide is IA task specific technical requirements that the CPI will be required to accept and adhere to.

---

Save  
Submit
CPI ACKNOWLEDGES - TECHNOLOGY CONTROL PLAN (TCP)

REVIEW AND ACCEPT CAMPUS TCP
(to be entered by Campus Principal Investigator - CPI)

* Required fields

You are here because the Task Request and Proposal has completed export review and has been determined to be export controlled. Transfer of technology has been approved by the Caltech Provost subject to the following conditions:

* 42. Please select one of the following options
   - I have read the above Campus Technology Control Plan (TCP) and agree with the conditions, including the implementation of the Caltech requirements for safeguarding export controlled information prior to its receipt.
   - I had read and reject the above Campus Technology Control Plan (TCP). By rejecting the TCP, you are withdrawing the entire IA Task Request.

   Provide reason for rejecting TCP

* 43. Will you use a Foreign Person at the onset of this research task?
JPI – DECLARES WORK COMPLETE

Interdivisional Authorization

DECLares WORK COMPLETE
(to be entered by JPL Principal Investigator - JPI)

You are here because it is 30 days before the expiration of the Period of Performance (POP) End Date [], as entered for this Task Request. Please choose one of the following options:

- Work is or will be completed by [], and this task is ready for closeout.
- I need to make a Modification to the Task Request (e.g. scope change, supplemental, continuation or renewal)
- I need to change the Period of Performance (POP) from [] to

NOTE: It is the JPI’s responsibility to ensure that all JPL loaned equipment for this task has been returned to JPL.

Close  SUBMIT
MODIFICATIONS TO AN IA REQUEST

Interdivisional Authorization

EDIT INTERDIVISIONAL AUTHORIZATION REQUEST

Modify Scope

Terminate Interdivisional Authorization

Update Period of Performance

Add Foreign Person(s)
BUSINESS AS USUAL – SUBMIT PAPER COPY OF PROPOSAL TO SPONSORED RESEARCH

- You still need to follow existing process of IA proposal submission to Sponsored Research Office:
  - DAF, proposal, budget, etc.

- You can print out and use existing information from IA electronic submission tool, i.e.,
  - Statement of Work
  - Budget
FACULTY EXPORT PROGRAM
FACULTY EXPORT PROGRAM

- As a reminder, you can find the Faculty Export Program on access.caltech under the section “Caltech Export Compliance Awareness Program”.

![Caltech Export Compliance Training page](image-url)
MAJOR REVISIONS TO THE EXPORT REGULATIONS

- Current revisions to the export regulations will greatly impact universities
- New definitions proposed in the regulations, including:
  - Publicly Available
  - Public Domain
  - Fundamental Research
- Will they have a Positive or Negative impact?
Questions?
SERVICE CENTER EMPLOYEES AS KEY PERSONNEL
SERVICE CENTER EMPLOYEES AS KEY PERSONNEL

- Service center employees may be included in research proposals when the scope of work is different than the normal functions of the service center.

- Effort of service center employees named as key personnel on sponsored projects must be:
  - Budgeted at a specific level or %
  - Charged directly to the sponsored project

- Re-allocation method via “WIC” should not be used.
NSF Salary Limitation
NSF Salary Limitation

- Long-standing policy that limits NSF salary support of Senior Personnel to two months in any one year
  - Applies *cumulatively* across all NSF awards, even those at other institutions
  - Institution may define “year”
  - Not absolute – proposal budgets may request more than 2 months; if budget approved by NSF, then excess salary support has been approved.
Why now?
- Originally, the NSF policy applied only to “summer months”; the policy did not apply to Caltech
- Beginning January 2010, NSF deleted the word “summer”; now the policy applies to Caltech

Who are Senior Personnel?
- Any PI/co-PI (cover page) and anyone listed in the Senior Personnel section of the NSF 1030 budget form (section A)
- Senior Personnel are not limited to “faculty”
Where is the risk?
- Rebudgeting of Senior Personnel to increase NSF pay in excess of two months; uncommon at Caltech, but it has happened

How is Caltech monitoring compliance?
- For each NSF-funded award, OSR will enter names of Senior Personnel into financial system, if not already included as PI/co-PI;
- Defining “year” as Caltech’s fiscal year
NSF SALARY LIMITATION (CONT.)

- Project Accounting will periodically run a report to identify Senior Personnel paid more than two months from NSF funds in any one year
  - For identified Senior Personnel, PA will review affected awards to determine if individual was approved for overage; if not approved, PA will contact Division – two options:
    - PI requests approval from NSF for excess salary (submit through FastLane); or,
    - Move excess, unapproved salary charge to discretionary funds
- The report will be available to Divisions (COGNOS)
  - “NSF Salary Compliance Report”
NSF Salary Limitation (Cont.)

- The report will be available to Divisions within COGNOS to allow them to monitor, as well
  “NSF Salary Compliance Report”
- Caltech procedure will be on Research Administration website today.
NIH Graduate Student Compensation Maximum
NIH Graduate Student Compensation Maximum

- Reminder – NIH limits the compensation that may be paid to graduate students
- Policy is based on the concept that graduate student compensation must be “reasonable”, e.g., it’s not reasonable to pay a graduate student more than a postdoc
- “Graduate Student Compensation” is defined as salary or wages *plus* benefits *plus* tuition remission
NIH GRADUATE STUDENT COMPENSATION MAXIMUM (CONT.)

- NIH implementation (NOT-OD-02-017)
  - Proposals should request the actual amount the PI intends to pay the graduate student (salary, benefits and tuition remission), which may not exceed Caltech-approved rates for graduate students.
  - NIH will cap awarded amounts at the zero-level NRSA stipend rate in effect at begin date of award.
  - Applies only to graduate students paid from NIH grants and cooperative agreements.
NIH Graduate Student Compensation Maximum (Cont.)

- PI may rebudget funds to pay higher than the zero-level NRSA stipend rate, but not higher than the lesser of an institutional entry level postdoc or institutionally approved compensation level for graduate students

- Any amount paid above NIH limitation must be paid from non-federal funds (e.g., from discretionary funds)
Caltech implementation

- “institutional entry level postdoc” compensation can be interpreted to mean “Division” or “Option” or “Lab”, as implemented by Division
- Divisions are responsible for monitoring compliance since “entry level postdoc” compensation standards vary between and within Divisions
Travel Services

- Airfare, rail, hotel, car reservations
- 24 hour emergency support
- Individual travel profiles
- Immediate response policy
- Multiple itinerary options given for all requests
- Conferences & meetings
- Visa & passport advice
- International travel specialists
- Fly America Act
24 Hour Emergency Support

- Support for travelers on the road anywhere in the world
- Traveler tracking & Crisis Management
- Managed in-house by your dedicated team of agents
- Travel within 48 hours
- No additional cost!
Travel Technology

Travel Portal & Online Booking Tool

• Customized website for Caltech

https://portal.corp.fcm.travel/caltech

• Access to online travel profile

• Online reservation tool brings up all available fares and options

• SSO Integration & Traveler security

• PCI Compliant with full encryption
Caltech Travel Managers:

**Caroline Moit**
213-239-9786
Caroline.Moit@corporatetraveler.us

**Joanna Mireles**
213-239-9786
Joanna.Mireles@corporatetraveler.us

**Shelly Ruiz**
213-239-9786
Shelly.ruiz@corporatetraveler.us
THANK YOU FOR COMING!

Please visit our website for a copy of today’s slides

http://researchadministration.caltech.edu