Current Processing Times (pre-September 1 funding)

Current turnaround from submission to sending out for signature:

- **Subawards**: 11 days
- **Subaward Modifications**: 5 days
Volume of Work
1/1/2012 – 8/9/2012

Sponsored Research

Subawards
Count: 263 Cost: $23,122,442.22

Subaward Modifications
Count: 638 Cost: $47,158,122.96

Sponsored Research current total
Count: 901 Cost: $67,120,426.18
FCOI Impact on subawards & modifications

For-Profit Entities

- Some think everything is proprietary, corporate officials may not want to comply

- Contract officers likely to send to corporate counsel
  - Do they really have to comply?
  - What does this mean for the company?
  - Likely to check with PI internally to see if they have any exposure

- Subrecipient PIs may need to affirmatively push to get this to clear corporate review
FCOI Impact on subaward modifications
Foreign Subrecipients

• Contract Officers
  – Many fine European institutions already have wonderful COI policies and procedures, won’t appreciate having to now comply with USA/PHS’s COI requirements
  – Will test whether we can give on this contractually
  – Will have to verify whether their COI satisfies PHS requirements
  – Alternatively, will have to determine whether they are willing and able to comply with UCSD’s COI
  – Possible language barrier

• Subrecipient PIs
  – Also won’t appreciate having to comply with USA/PHS’s COI requirements
  – Possible language barrier
  – May need to help drive this through Subrecipient’s internal processes
What can be done to expedite for those projects that can’t afford delay?

- Send subrecipient commitment form with COI certification and disclosure early
- UCSD PIs discuss with Subrecipient PIs so they are ready to proceed and even help push through on their end
- Contact Valerie Dixon about the 14-day bridge