# New Award Management Policy

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CIRM
CALIFORNIA INSTITUTE FOR
REGENERATIVE MEDICINE

# Our Mission

Accelerating world class science to deliver transformative regenerative medicine treatments in an equitable manner to a diverse California and world.
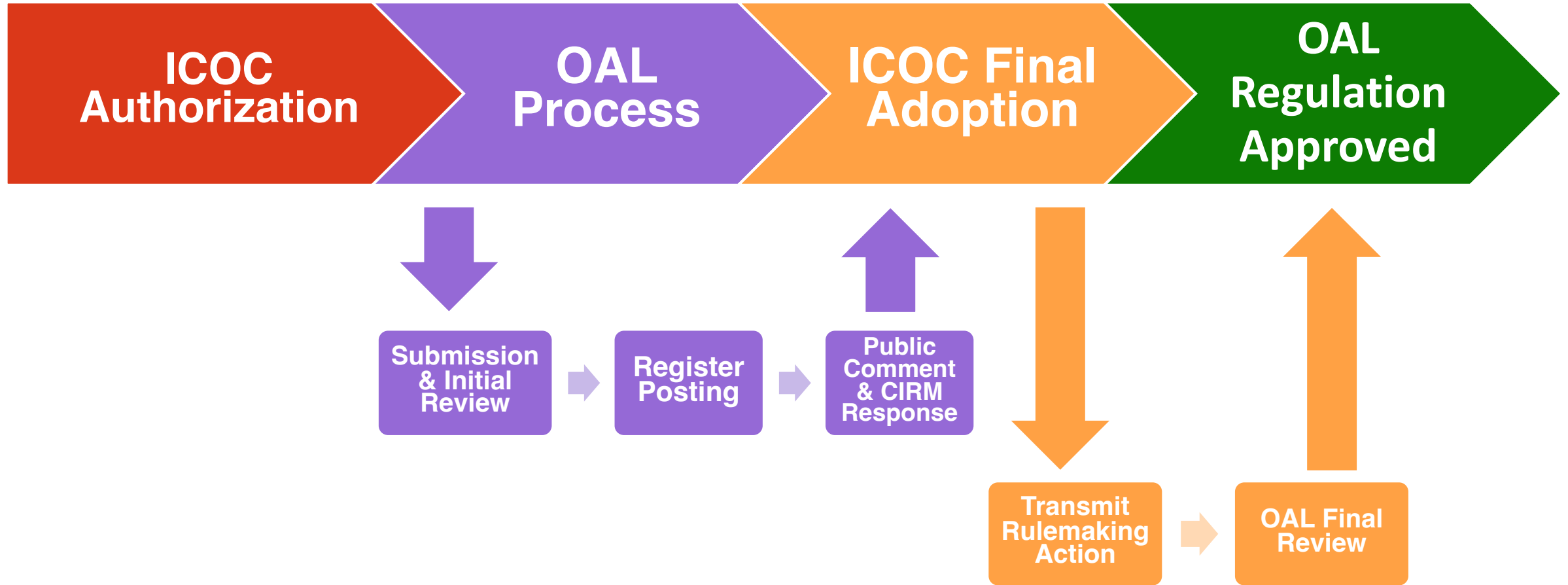
# Background

**The Grants Administration Policy is a set of regulations that govern the management of CIRM awards.**

- 2006 – ICOC adopted first Grants Administration Policy

- 2008 – ICOC adopted Grants Administration Policy for Facilities & Equipment Grants

- 2016 – ICOC adopted the current active Grants Administration Policies

  - Grants Administration Policy for Clinical Trial Stage Projects

  - Grants Administration Policy for Discovery, Translation, and Education

**CIRM must follow the California Office of Administrative Law process for creating any new regulation.**

# Process & Effective Date



ICOC Authorization → OAL Process → ICOC Final Adoption → OAL Regulation Approved

Submission & Initial Review → Register Posting → Public Comment & CIRM Response

Transmit Rulemaking Action → OAL Final Review

# Executive Summary

- Shifting from current use of 3 GAPs to one unified all-encompassing policy
  - High level policy that removes distinctions by program, organization type, or facilities components
  - Offers consistency and adaptability as the SAF is operationalized
- Maintains the chronological organization of the grant-making process
- Removes duplicative reference to other policies
- Adds in new elements of Proposition 14 era of CIRM
- Streamlines language choice and definitions
- User-friendly, clear, enforceable and timeless
- Renames to Award Management Policy (AMP)

# Highlights of the Changes

**Definitions/Terminology**

- New term, Critical Role, which is a subset of Key Personnel that have a minimum effort requirement as described in the PA/RFA and any change in the role could cause serious disruption to the project and its operations. Prior Approval will be required to change these roles or reduce effort requirements.

- Clinical Advisory Panels changed to CIRM Experts. CIRM Experts will serve as strategic advisors to CIRM staff on an ad-hoc basis to guide project direction and ensure alignment with program goals. This role can be deployed in individual PA/RFAs.

**Application Review**

- Removes terms associated with application budget review process and scoring criteria section that are and will continue to be enforced in the relevant PA, GWG Bylaws or Concept Plans.

**Terms & Conditions**

- Adds requirement to acknowledge CIRM in any public communications (press release, publications, conference presentations, etc.).

- Contains outdated LIBOR loan conversion rates. Replaced by Secured Overnight Financing Rate (SOFR).

# Highlights of the Changes

**<u>Allowable/Unallowable Costs</u>**

- Allowable maximum salary for Award personnel will align with UCOP Health Sciences Compensation Plan

- Addition of patient-qualified costs to Allowable Cost Policy for participation in a CIRM-funded trial by a donor, patient, or caregiver that include travel, housing, childcare, and medical care.

- Addition to Unallowable Cost Policy of payments to potential or enrolled research participants.

- Changes to Allowable Facilities costs:
    - Non-profit federally-negotiated rates will no longer be accepted by CIRM for Facilities A & B costs
    - Non-profits and for-profits without federally-negotiated rates will no longer get 35% automatically
    - ICOC will determine the allowable facilities costs based on analysis of federal, state, and/or comparative funder overhead rates.*

*Note: CIRM Staff would bring forth a recommendation to the ICOC in FY 25/26.*

# Highlights of the Changes

**Strategic Allocation Framework alignment**

- Strengthens Equipment Management section to include requirement for Awardees to have procedures to leverage CIRM-funded equipment on any future CIRM Applications and Awards.

- Adds Data Sharing and Management section to specify reporting requirement, imposes non-compliance penalties and requires that the DSMP be fully executed by Award close

**Funds Management**

- Clarifies policy regarding award close-out with addition of:

  - Terminated awards relinquish unobligated balance owed by CIRM if final reporting is not submitted within 120 days

  - Closed awards cannot request a revision to financial reporting after 6 months of the award end date

- Specifies that CIRM funds must be placed in an interest-bearing account and Awardee must track accrued interest.  Any interest earned can be used towards the award or must be returned to CIRM.

# Highlight of Changes

**Training Grants**

- Removes specific policy limits for mentor to trainee ratios and allows PA/RFA to specify ratios

- Tuition & Fees section removes a detailed calculation in favor of the relevant PA/RFA setting limits

- Research Related Activities section includes specific indirect cost recovery rate for host institutions (internship sites)

- Trainee Travel specifies that funds are for travel to annual CIRM-sponsored conference and remaining funds can be used to cover other trainee travel related to the program

- CIRM approval will be required only when rebudgeting from Trainee-Related to another category: Program Admin or Indirect Cost. Allows flexibility to rebudget between trainee cost categories.

- No-Cost Extension allowed for up to 12 months if it is in service of Trainee completion of their training term

# Request for Board Action

The CIRM Team requests for approval by the ICOC to initiate the rulemaking process to adopt the Award Management Policy.