

UC IRVINE RESEARCH POLICIES, GUIDELINES & PROCEDURES

OFFICE OF RESEARCH

Section 483-5: Guidelines for UCI Employee Participation in the SBIR & STTR Grant Programs

Responsible Administrator: Vice Chancellor for Research – Office of Research

Issued: December 2013

Revised: N/A

References/Resources

[SBIR & STTR Grant Programs](#)

[Section 438-3: Guidelines for the Requirement to Submit Proposals and Accept Awards through the University](#)

[UC Contract and Grant Manual](#)

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A. Purpose

The federal Small Business Innovation Research (SBIR) and Small Business Technology Transfer (STTR) grant programs encourage the engagement of small business concerns (SBC) in federal research and development. UCI is not eligible to directly receive SBIR/STTR funding, but because collaborations between SBCs and research institutions are encouraged by the SBIR program and required by the STTR program, SBCs regularly seek UCI researchers to participate in their projects. UCI researchers may also want to start or grow their own SBC and consider SBIR/STTR funding important for the establishment and/or future development of their SBC.

B. Compliance with University Regulations

In all cases, UCI researchers may collaborate with SBCs on SBIR/STTR funded projects. However, all activities undertaken by UCI employees associated with the SBIR or STTR funding programs (for example, proposal development, project leadership and oversight, performing research, and managing awards) must comply with UC/UCI regulations, including:

- [UC Standards of Ethical Conduct](#)
 - [Special Services to Individuals and Organizations \(APM 020\)](#)
 - [Conflict of Commitment and Outside Activities of Faculty Members \(APM 025\)](#)
 - [Conflict of Interest in Research](#)
 - [Intellectual Property and Patents](#)
 - [Guidelines for University-Industry Relations](#)
 - [Guidelines for Compliance with Export Control Regulations](#)
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C. General Requirements

- The UCI Principal Investigator on any subcontract from an SBC and the SBC's Principal Investigator must not be the same individual due to the unmanageable conflict of interest that would result from such an arrangement.
 - A clear distinction must be made between the work to be performed by the SBC and that performed by UCI.
 - SBCs may not use any UCI resources (for example, space, facilities, instruments or equipment, or human resources) to carry out their portion of the work unless:
 - The SBC utilizes a UCI recharge facility or service; and/or
 - The SBC leases space in a UCI-owned/operated incubator (such as TechPortal, TechPortal Orange, Beckman Laser Institute Photonic Incubator).
 - UCI researchers supported by a SBIR/STTR subcontract may not concurrently consult for the SBC on the same project.
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D. [Conflict of Interest Disclosure](#) and Management Requirement

- **For Phase I funding** - UCI Principal/Co-Principal Investigators must complete [Form 700-U](#) and disclose their financial interests in the SBC, if any, as well as those held by their spouse, registered domestic partner and dependent children.
- **For Phase II or III funding** – UCI Principal/Co-Principal Investigators must complete [Form 700-U](#) and disclose their financial interests in the SBC, if any, as well as those held by their spouse, registered domestic partner and dependent children. In addition, UCI Principal/Co-Principal Investigators and any other UCI employee or appointee (for example, without salary appointees) responsible for the design, conduct or reporting of research must also complete:
 - [Form 800](#) if the research will be funded by the U.S. Public Health Service; or
 - [Form 900](#) if the research will be funded by the U.S. National Science Foundation.
- A conflict of interest management plan is required and must be implemented to ensure the objective performance and reporting of the research if a UCI Principal/Co-Principal Investigator or their spouse, registered domestic partner and/or dependent children have a financial interest in the SBC that exceed the minimum thresholds for reporting.
- Prior to UCI's acceptance of a subcontract from the SBC and the performance of UCI's portion of the SBIR/STTR-funded work, the conflict of interest management plan must:
 - Be reviewed by the UCI Conflict of Interest Oversight Committee; and

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- Approved by the Vice Chancellor for Research or designee.
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E. Approval and Submission of SBIR & STTR Proposals

- UCI Principal Investigators must submit their subcontract proposals to Sponsored Projects Administration (SPA) for review and approval before submitting them to the SBC. The UCI Principal Investigator is responsible for providing a copy of the completed proposal (with both UCI's and the SBC's portions) to SPA, in the event the federal government requests Allocation of Rights documentation from the SBC.
 - SPA is responsible for negotiating a subcontract between the SBC and UCI. UCI employees with financial interests in the SBC (including interests held by their spouse, registered domestic partner and/or dependent children) may not be involved in such negotiations, and may not act on behalf of the SBC in such negotiations due to the unmanageable conflict of interest that would result from doing so.
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F. Use of UCI Developed Technology

- The SBC may not use UCI-developed technology without first negotiating a letter of intent, option or license from the Office of Technology Alliances.