CALIFORNIA STATE UNIVERSITY
BAKERSFIELD ™

Office of Grants, Research
and Sponsored Programs

PRE-AWARD PROGRAM ADMINISTRATION GUIDE

**California State University, Bakersfield
and
Auxiliary for Sponsored Programs Administration**
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FOREWORD

This Pre-Award Program Administration Guide (PPAG) is designed to provide project directors, principal investigators, and their program staff information about the required approvals, campus policies, and operational procedures that relate to the submission, and processing of proposals, agreements, and contracts for the California State University, Bakersfield (CSUB) or the CSUB Auxiliary for Sponsored Programs Administration (SPA). Guidance relating to post-award activities, policies and procedures can be found at the following website:

https://www.csub.edu/bas/fiscal/sponsored-program-reporting-grasp/index.html.

Important*: Early in the pre-award proposal or bidding stage of a grant or contract, faculty are required to consult with the Sponsored Programs Development Office. It is CSU policy that only officials (or designee) delegated by the CSUB Campus and the SPA Board are authorized to negotiate budgets and services and submit and/or sign proposals and award agreements.*

This PPAG broadly covers those pre-award and research compliance policies and procedures that most directly affect you and is meant to serve as a general information source only. For details not provided in this guide, you are encouraged to contact GRaSP. Future policies and procedures, including changes to those presented here, will be made available as updates occur.

The PPAG is not intended to create, nor is it to be construed to constitute, a contract between CSUB or SPA and any of their employees, principal investigators, or other project staff.

Comments and questions concerning the guide are welcome at any time.

Office of Grants, Research, and Sponsored Programs (GRaSP)
California State University, Bakersfield
661.654.2231

DISCLAIMERS

Note: *This guide is directed at pre-award activities of grants, research, and sponsored programs. The CSU and University administrative policies and procedures apply to grants awarded to either the University or SPA.*

GRaSP adheres to the policies of the Sponsored Programs Pre-Award Review and Proposal Review and Approval Policy (formally ICSUAM), and to 2 CFR 200 - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

Sponsor Policy versus CSU Policy
Please note that this guide highlights the most common procedures and general CSU requirements and guidelines. If there is a conflict between the sponsor's and the CSU's requirements and/or restrictions, the stricter guidelines are to be followed.

ORGANIZATIONAL STRUCTURE

California State University, Bakersfield (CSUB/University)

The "University" is one of the twenty-three campuses in the California State University (CSU) system. The system was established under the State of California Education Code as an agency of the State of California. The University Procurement Department is the contracting agent for all awards and contracts, while the Sponsored Programs Post Award Office under the Business Administrative Services Department acts as the designated unit for the administration of grants, contracts, and agreements.

CSUB Auxiliary for Sponsored Programs Administration (SPA)

Established in August 2009, "SPA" is the 501(c)3 auxiliary business unit designated to submit proposals and administer funds for externally sponsored awards within CSU policy.

Office of Grants, Research, and Sponsored Programs (GRaSP)

The Office of Grants, Research, and Sponsored Programs (GRaSP) is the entity designated to develop and submit proposals for grants, contracts, and sponsored programs on behalf of both the University and SPA. GRaSP currently includes 6 sections, along with their processes, as described below:

1. Sponsored Programs Development (pre-award) Services
2. Research Compliance Services
3. General Sponsored Programs Administration Services
4. Intellectual Property and Technology Transfer Services
5. Faculty and Student Research Initiatives
6. Development of Contracts and Agreements

PROJECT DEVELOPMENT

The development of sponsored programs requires a collaborative effort between the Principal Investigator (PI) or Program Director (PD) and the Office of Grants, Research, and Sponsored Programs (GRaSP). The purpose of this guide is to outline the general responsibilities of both the PI and GRaSP, present an overview of project development focusing on the PI's role, and provide PIs and their staff with the policies, documentation, and forms needed.

Role of the Principal Investigator/Program Director

The Principal Investigator or Program Director is the individual responsible for ensuring compliance with the academic, scientific, technical, ethical, financial, and administrative aspects and for the day-to-day management of the sponsored program. The PI has the dual responsibility of complying with the financial and administrative policies of the award while achieving the technical success of the project or program. For further details regarding PI/PD responsibilities, please contact the Sponsored Programs Post-Award (SPPA) office.

The PI is also responsible for ensuring the ethical behavior of all individuals involved in the project. For research projects, research certifications are required for all post-doctoral students and student assistants; and Institutional Review Board approvals may be required:

Research Ethics Certifications

In line with Federal Regulations and the CSUB Responsible Conduct of Research (RCR) certification process, each undergraduate, graduate, and post-doctoral student working (paid or unpaid) on a research grant must obtain a Research Ethics Training Certificate. CSUB provides an online certification process through the University of Miami's Collaborative Institutional Training Initiative (CITI) Program. PIs must coordinate with GRaSP to ensure that students working on their projects access the training course and obtain a certificate before they start working on their project. PIs must also ensure that a list of students working on their projects is provided to the GRaSP Research Compliance unit along with copies of the certifications which will be made available to the SPPA Office.

Institutional Review Board and Institutional Animal Care and Use Committee Approvals

For projects involving animal or human subjects research (this includes administration of surveys to project or program participants), CSUB institutional review board approval is required. PIs must coordinate with the GRaSP Research Compliance unit well in advance of the beginning of the project to submit applications to the Institutional Animal Care and Use Committee (IACUC) or

Human Subjects Institutional Review Board (HSIRB). Research activities involving human or animal subjects may not begin until an official authorization letter has been issued. The PI must ensure that any changes or modifications are not initiated without CSUB IRB or IACUC review and approval, except when necessary to eliminate apparent immediate hazards to the participant. The PI must ensure that renewal and closeout requests are submitted when due and provide copies of the review board approvals to the GRaSP Research Compliance Officer.

Refer to Institutional Review Board Policies and Procedures on our website at the following location:
https://www.csub.edu/grasp/Research%20Compliance/IRB/BackgroundDocs/index.html

Refer to Institutional Animal Care and Use Committee Policies and Procedures on our website at the following location:
https://www.csub.edu/grasp/Research%20Compliance/IACUC/IACUC%20Review%20Procedures/index.html

Establishing a Chartfield Account(s)

The establishment of a Chartfield Account is the responsibility of the Sponsored Programs Post Award Office. Please refer to the following website for further information regarding this process: https://www.csub.edu/bas/fiscal/sponsored-program-reporting-grasp/index.html

Facilities and Administrative Costs (F & A) - Indirect Rate

The F & A rate from July 2017 through June 2021 is 47% for on-campus costs and 22% for off-campus costs for all programs applicable to California State University Bakersfield, CSUB Auxiliary for Sponsored Programs, and California State University Bakersfield Foundation. Justification must be documented and attached to the Proposal Routing for all proposed below-cost indirect rates. Agreements with all California state agencies must follow the AB20 California Model Agreement, with the exception of those exempted by the Department of General Services (DGS). Agreements with California state agencies that request lower than the agreed indirect rate must be approved by the Chancellor's office.

Distribution of recovered indirect is governed by institutional policy:
https://www.csub.edu/grasp/_files/SPA-
AUX/CSUB%20Policy%20on%20Use%20of%20Recovered%20F%20and%20A.pdf

Proposal Routing Procedure

All proposals are routed, reviewed, and approved by all institutional signatories prior to submission. The proposal routing procedure will require signatures from the Principal Investigator, the applicable Department Chair, School Dean, the Director of Sponsored Programs Development, the AVP of GRaSP, VP for Academic Affairs/Provost, VP of Business and Administrative Services, and other relevant department or unit managers as authorized. The proposal routing will include narrative information on the project proposed, budget documentation, and supporting documentation such as the funding announcement.   Prospective PIs should initiate the grant routing process through **CAYUSE SP**, which can be found at: https://www.csub.edu/GRASP/CAYUSE/index.html

SPONSORED PROGRAMS DEVELOPMENT (PRE-AWARD)

Members of the Sponsored Programs Development (SPD) staff meet with individual faculty and staff to determine research interests and to identify and forward funding information to faculty and staff relating to those interests. The SPD staff meets with faculty to enroll them in **PIVOT** (our automated faculty profile/funding notification system), performs searches of funding opportunity databases to identify potential funding sources for cross-departmental and University-wide initiatives, and performs searches to match faculty interests with funding opportunities. Additionally, all awards and contracts are received and processed by GRaSP SPD.

Proposal Development

The Sponsored Programs Development (SPD) staff interacts with faculty to identify potential funding opportunities, reviews funding agency guidelines to determine CSUB's eligibility to participate in the funding program as well as ensuring responsiveness to the guidelines. The SPD staff assists with proposal development and establishes a proposal preparation timeline that meets the submission deadline. SPD staff facilitates collaborations among faculty members as needed/requested to strengthen the proposals.

Additionally, SPD staff reviews and edits proposals for content, spelling, grammar, format, accuracy, and appropriateness. SPD staff ensures the statement of work is adequate, as well as ensuring compliance with agency and university regulations. The SPD staff works with the PI to create budgets and cost proposals, ensuring the use of appropriate rates, so that the funding requested is adequate to perform each proposed project and abides by university rules and regulations.

SPD staff reviews all university commitments for cost sharing for appropriateness and allowability. The SPD staff works with the PI to complete internal and agency forms to upload into the funding agency proposal submission portal. SPD staff edits the administrative portions of proposals including information about university resources and other support; works with PIs and subcontractors when CSUB is the lead institution to procure subcontractor proposals including letter of commitment, statement of work, and budget. When CSUB is the subcontractor, the SPD staff works with PIs to develop statements of work and deliverables for subcontracts as well as completing and submitting all subrecipient information required by the collaborating institution prior to submission. The SPD staff notifies PIs of awarded or declined proposals and encourages resubmission when appropriate. SPD staff makes data entry into proposal tracking system and maintains Sponsored Programs Development files pending award decision.

Outreach and Reporting

Members of SPD staff develop materials and participate in presentations and workshops related to proposal development, assist with setting internal policies and procedures as related to sponsored projects, market GRaSP events and services, and update and maintain the SPD/GRaSP web site. Additionally, the Director of the SPD staff submits Sponsored Programs related news announcements to CSUB Public Relations Office. The SPD staff assists the AVP in the creation and production of GRaSP publications (annual reports, etc.) for internal and external uses. The SPD staff assists with the development and maintenance of a proposal tracking system and an intellectual property database. The SPD staff meets with departments on campus to increase awareness and value of our services through project creation and implementation. The SPD staff provides training opportunities and workshops about research and sponsored programs for the university community on topics such as budget development, grant writing, intellectual property, etc.

The SPD staff represents GRaSP at campus community events and serves as the pre-award liaison between the PI and funding agency and facilitates faculty mentoring of students through grant-funded projects.

Suspension and Debarment

As part of the proposal routing procedure, PI's are required to attest to federal suspension and debarment requirements for all personnel during the proposal phase. PI's document their response on the proposal routing procedure to be reviewed by Pre-Award staff. Subsequently, Pre-Award staff independently verify PI's and key personnel for suspension and debarment via the Descartes Visual Compliance platform, uploading website documentation into the proposal routing package. Additional documentation will be uploaded into the proposal routing package as appropriate that documents communication between Pre-Award staff and proposal personnel. These documents will remain part of the proposal routing package in preparation for an award to transmit to the Post-Award Office.

DEVELOPMENT OF CONTRACTS AND AGREEMENTS

Award/Contract Negotiations

When awards are received, the Director of Sponsored Programs Development (SPD) (GRaSP Pre-Award) forwards the award documents to the Senior Grants and Contracts Analyst. The Senior Grants and Contracts Analyst reviews the award documents against the proposal routing package and the proposal submitted to the sponsor. The Senior Grants and Contracts Analyst attaches the routing package to the award documents and then sends the combined package to the Research Compliance Analyst. The Research Compliance Analyst reviews the documents for any compliance related concerns. Once reviewed, the award documents and routing package are sent back to the Senior Grants and Contracts Analyst with comments noted. The Senior Grants and Contracts Analyst will determine if identified concerns must be addressed at Pre-Award stage.

The award documents and the proposal routing package are then forwarded to the Director of SPD for a final review. The Director of SPD forwards the award documents and proposal routing package to the Assistant to the AVP and to Sponsored Programs Post

Award Office for account set up.

Contracts and/or subcontracts are received by the Senior Grants and Contracts Analyst who reviews and negotiates terms and conditions of contracts, subcontracts, and non-financial modifications with sponsoring agencies. The Senior Grants and Contracts Analyst ensures accuracy and appropriateness of terms and conditions so that the University, the Auxiliary, and the PI, can meet the award terms and conditions. Once fully executed, the same steps are followed as specified above for award processing to the Sponsored Programs Post Award Office.

The Senior Grants and Contracts Analyst creates contracts, agreements, and modifications for funded sponsored projects, informs PIs of award terms and conditions, and communicates the importance of PI compliance with the terms and conditions. The Senior Grants and Contracts Analyst works with PIs to develop statements of work, deliverables for contracts, revision of budgets, and clarification of any conflicting information. At the end of the negotiations, the Senior Grants and Contracts Analyst forwards the documents for signature, both internally and externally. After the documents are fully executed, the same steps are followed to process the agreement to the Sponsored Programs Post Award Office.

RESEARCH COMPLIANCE SERVICES (RCS)

GRaSP offers Research Compliance services through a dedicated staff working in concert with the Research Ethics Review Coordinator. The Research Compliance staff provides administrative support to the Institutional Review Board (IRB) and Institutional Animal Care and Use Committee (IACUC) and provides assistance to faculty, staff, and students with questions regarding submission of research protocols to the IRB or IACUC for review. In collaboration with the Research Ethics Review Coordinator, the RCS monitors compliance with regulations for human subjects and animal care and use in research for faculty, staff, and student participation in University programs. The staff of RCS monitors research compliance in student and faculty research funding programs through compliance review of applications for internally funded programs such as: Travel Support for Student Research (TSSR), Student Research Scholars (SRS), Student

Research Competition (SRC), Student Poster Competition (SPC), and Research Council of the University (RCU) Faculty Mini-Grants.

Additionally, RCS staff:

- provides support for the Human Subjects Protection Training Program
- provides support for the Humane Care and Use of Animal Subjects in Research Training Program
- provides support for the Responsible Conduct of Research (RCR) Training Program
- provides support for the Conflict of Interest (COI) Training program in collaboration with the institutional filing office
- provides support for Unmanned Aircraft Systems Review Board (UASRB) research compliance
- supports Sponsored Programs Post Award Services in monitoring compliance with IRB, IACUC, RCR, COI, and UASRB regulations on grant-funded projects
- monitors compliance and maintains related training records

Human Subjects Protection Training Program

CSUB provides an online certification process through the University of Miami's Collaborative Institutional Training Initiative (CITI) program. PIs are responsible for ensuring that all key personnel complete the CITI training and obtain a certificate prior to their participation in the project. PIs must also ensure that a list of their personnel is provided to RCS.

Refer to Institutional Review Board Human Subjects Protection Training Procedures on our website at the following location:
https://www.csub.edu/grasp/research%20compliance/irb/HSPT/index.html

Humane Care and Use of Animal Subjects in Research Training Program

CSUB provides an online certification process through the University of Miami's Collaborative Institutional Training Initiative (CITI) services. PIs are responsible for ensuring that all key personnel complete the CITI training and obtain a certificate prior to their participation in the project. PIs must also ensure that a list of their personnel is provided to RCS.

Refer to Institutional Animal Care and Use Committee - Humane Care and Use of Animal Subjects Training Procedures on our website at the following location:
https://www.csub.edu/grasp/Research%20Compliance/IACUC/HCUASTraining/index.html

Responsible Conduct of Research (RCR) Training Program

CSUB provides an online certification process through the University of Miami's Collaborative Institutional Training Initiative (CITI) services. PIs are responsible for ensuring that their students complete the CITI training and obtain a certificate prior to their participation in the project. PIs must also ensure that a list of the students is provided to RCS. Refer to the Responsible Conduct of Research Training Procedures on our website at the following location:
https://www.csub.edu/grasp/Research%20Compliance/Responsible%20Conduct%20of%20Research%20-%20RCR/index.html

Conflict of Interest (COI) Disclosure

PI's and key personnel are required to complete a conflict-of-interest form for all grant submissions and sponsored projects. As part of the proposal routing procedure, completed conflict of interest form(s) will be attached to the proposal routing package. Dependent upon the sponsor, PI's and key personnel should complete either Form 700-U (Statement of Economic Interests for Principal Investigators) for state, county and city governmental entities, and private entities or the Federal conflict-of-interest form (Federal Conflict of Interest disclosure form) for federal government sponsors. Pre-Award staff verifies that these forms are uploaded to the proposal routing package. Additionally, Pre-Award staff re-verifies these conflict-of-interest forms before submitting the proposal routing package and award documents for transmission to the Post-Award Office.

Conflict of Interest (COI) Training

Completion of conflict-of-interest training is addressed through the CSU Learn and CITI platforms for non-federal and federal awards respectively. Conflict-of-interest training resources can be accessed at:

Non-federal: CSU Learn Information | California State University, Bakersfield (csub.edu)
Federal: Research, Ethics, and Compliance Training | CITI Program

Non-Federal Awards

When notified of a new non-federal award or the assignment of a replacement PI on an existing project, the Pre-Award staff communicates with the CSUB COI Filing Office; who assigns the PI to complete the CSU Learn Conflict of Interest training course within 60 days' time. On a monthly basis, Pre-Award staff will verify that PI's and key personnel have completed the applicable training and earned a passing score.

Federal Awards

When notified of a new federal award, the Post-Award Office staff directs the PI to complete the CITI Program FCOI training course. Post-Award Office staff will verify that PI's and key personnel have completed the applicable training and earned a passing score.

All PI's and key personnel must complete the applicable training module to ensure compliance. Certificate of completion should be maintained by PI's and key personnel for their records

Unmanned Aircraft Systems Review Board (UASRB)

Unmanned Aircraft Systems (UAS) cannot be flown on CSUB property without prior authorization. Planned flights of CSUB owned UAS off campus must also obtain prior authorization. It is the policy of the California State University, Bakersfield, that all activities involving the use of UAS shall be conducted in compliance with applicable federal, state, and local laws, statutes, and regulations, and in compliance with other relevant university policies and procedures.

Refer to Use of Drones/Unmanned Aircraft Systems on CSUB Campus Policies, Procedures, and Step-by-Step guide on our website at the following location: https://www.csub.edu/grasp/Research%20Compliance/Unmanned%20Aircraft%20Systems%20-%20Drones/index.html

Export Control

The federal government has instituted laws to protect national security and to promote U.S. foreign policy. Federal export controls are implemented through the regulations promulgated under these laws. The two sets of regulations most prominent to University activities are the **Export Administration Regulations (EAR)**, administered by the Department of Commerce, and the **International Traffic in Arms Regulations (ITAR)**, administered by the Department of State. In addition, economic and trade embargoes and sanctions administered by the **Office of Foreign Assets Control (OFAC)** include restrictions that may affect University activities.

Export Control is a university-wide function and responsibility that has impact across multiple areas and offices of the campus and can involve CSUB Faculty, Staff, Students, and Postdocs, as well as Visitors and other outside Agencies or Personnel. California State University, Bakersfield Office of Grants, Research, and Sponsored Programs (GRASP) is only one area impacted by export control regulations. GRASP complies with federal laws and regulations governing exports and ensures that compliance is consistent with the University's Export Control policy and open academic environment.

ROLES AND RESPONSIBILITIES

PI Responsibility:

The PI is responsible to:

take the CITI Export Control Training Modules to gain an understanding of the federal requirements concerning Export Control. The CITI training modules can be accessed at https://www.citiprogram.org/

- maintain a copy of the certificate of completion
- complete the Export Control questions in CAYUSE SP during the routing process
- complete the Export Control questions in Cayuse IRB module and respond to any questions from the Human Subjects Institutional Review Board
- complete the Export Control questions in Qualtrics IACUC protocol and respond to any questions from the Institutional Animal Care and Use Committee
- ensure that the project is consistent with export control regulations
- provide all non-disclosure, confidentiality, or intellectual property agreements pertaining to sponsored research to GRASP for review and approval
- contact the Export Control Committee to provide any export-controlled information or technology received from an outside party or that may be generated under a classified, restricted, proprietary project or project that is otherwise not considered fundamental research to determine if a Technology Control Plan is required
- assist the Export Control Committee to develop Technology Control Plan

GRASP Responsibility:

- GRASP Development Analyst reviews the Export Control section of the routing forms in CAYUSE SP. Questions or concerns are addressed with the PI before proceeding in routing the forms for signature or submission of proposal. Unanswered concerns are elevated to the AVP of GRASP for review and determination whether the concern should be elevated to the Export Control Committee for review and resolution
- GRASP Research Compliance Analyst reviews the Compliance sections of the IRB module. Questions or concerns regarding Export Control are addressed with the PI before proceeding in routing the forms to Compliance Committee for review
- GRASP Research Compliance Analyst reviews Unmanned Vehicle requests regarding Export Control concerns. Questions or concerns are elevated to the AVP of GRASP for review and determination whether the concerns should be elevated to Export Control Committee for review and resolution
- GRASP alerts faculty of requirement to take the CITI Export Control Training Modules
- GRASP Contracts Analyst reviews incoming awards and contracts for Export Control-related concerns including, but not limited to:
  - publication restrictions
  - IP ownership
  - foreign nationals
  - licensing requirement/restrictions
  - Fundamental Research Exemption

- GRASP Contracts Analyst reviews and negotiates language in non-disclosure agreements and confidentiality agreements pertaining to sponsored research, sponsored research agreements, grants, contracts and other binding documents regarding export control concerns for the University
- GRASP Contracts Analyst alerts and reviews any concerns regarding export control clauses in agreements with the AVP of GRASP
- AVP of GRASP makes determination if concern should be elevated to Export Control Committee for review and resolution

STUDENT RESEARCH PROGRAMS

Travel Support for Student Research (TSSR) Program

Funded by the Office of the President, the Travel Support for Student Researchers (TSSR) Program provides limited funds to students to attend conferences and professional meetings. All registered CSUB students are eligible to apply for TSSR funding. A funding announcement is sent out at the beginning of each semester and award decisions are made soon thereafter. Reimbursement is made to students using university travel forms and guidelines.

Student Research Scholars (SRS) Program

Supported by the President Associates, the Student Research Scholars (SRS) Program provides funding to selected students to conduct research and creative activities through faculty mentorship. Students are selected for this annual award before the beginning of the Fall Semester of each year. All registered CSUB students are eligible to apply for SRS funding through the InfoReady Review portal maintained by GRaSP. The student applications are reviewed and ranked by faculty members of the Research Council of the University (RCU) committee.

Student Research Competition (SRC)

The Student Research Competition (SRC) is a competition for CSUB graduate and undergraduate students to present their research and creative activities to the campus community. Students have an opportunity to make an oral presentation in front of an audience. The presentations are judged by faculty or community experts in the field of research and selected winners are chosen to represent CSUB at the California State University (CSU) statewide competition.

Student Poster Competition (SPC)

The Student Poster Competition (SPC) is a competition for CSUB graduate and undergraduate students to present their research and creative activities to the campus community. Students have an opportunity to make a poster presentation in front of an audience and campus community. The presentations are judged by faculty or community experts in the field of research.

FACULTY RESEARCH FUNDING

Research Council of the University (RCU) Faculty Mini-Grants

With funding from the California State University (CSU) Office of the Chancellor and CSUB Office of the Provost, CSUB faculty are awarded funds to conduct research, scholarship, and creative activity. A funding announcement is sent out at least once per year to all faculty. The applications are reviewed and ranked; and funding recommendations are made by the Research Council of the University (RCU). All awardees are required to submit written reports describing project outcomes at 6,12, and 18 months following the award start date.

INTELLECTUAL PROPERTY AND TECHNOLOGY TRANSFER SERVICES (IPATT)

GRaSP provides supporting Intellectual Property and Technology Transfer (IPATT) services to enable faculty, staff, and students to disclose, protect, and manage patentable intellectual property. The IPATT staff reviews and processes invention disclosures. The IPATT staff facilitates patent application, development of sponsored projects with industry, and marketing of CSUB technology.

GENERAL SPONSORED PROGRAMS ADMINISTRATION (GSPA)

The Office of the Associate Vice President (AVP) for Grants, Research, and Sponsored Programs is responsible for the coordination and management of all GRaSP functions and services. The general sponsored programs administrative services of the Office of the AVP involve overview and coordination of GRaSP services, development of policies and procedures, GRaSP personnel and budget management, faculty research support/RCU, Facilities and Administrative cost rate negotiation with Funding Agencies, administrative overview of Centers and Institutes, GRaSP data and website management, GRaSP Events management, operation of the CSUB Auxiliary for Sponsored Programs Administration, and coordination of GRaSP Services with Sponsored Programs Post Award Services as well as Business and Administrative Services.

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