CALIFORNIA STATE UNIVERSITY BAKERSFIELD™

Office of Grants, Research and Sponsored Programs

PRE-AWARD ADMINISTRATION GUIDE

Office of Grants, Research, and Sponsored Programs
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Auxiliary for Sponsored Programs Administration
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FOREWORD

The Division of Pre-Awards in the Office of Grants, Research and Sponsored Programs (GRaSP) at California State University, Bakersfield's (CSUB) is committed to the promotion and support of research, scholarship, and creative activity by providing the important infrastructure for the procurement of extramural and intramural funding. This Pre-Award Administration Guide (PAAG) is designed to provide principal investigators information that relates to the development, processing and submission of proposals leading to awards, agreements, and contracts for the CSUB Auxiliary for Sponsored Programs Administration (SPA) or California State University, Bakersfield (CSUB).

The Division of Pre-Awards adheres to the CSU Sponsored Programs Administration Policy https://calstate.policystat.com/policy/14459936/latest/ and to 2 CFR 200 - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl. Please note that this guide highlights the most common procedures and general CSU requirements and guidelines.

For comments and questions concerning the guide, contact:
Office of Grants, Research, and Sponsored Programs (GRaSP)
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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.

California State University, Bakersfield, Auxiliary for Sponsored Programs Administration (SPA)

The California State University Bakersfield Auxiliary for Sponsored Programs Administration (SPA) was established in 2009 as a non-profit, 501(c)3 auxiliary business unit designated as the entity that receives and administers funds from externally sponsored awards. Following CSU policy, SPA is governed by a Board of Directors, whose principal functions are the responsible management of funds and to establish policies to guide SPA in achieving its objectives. To that end, SPA coordinates its operations with the operations of the campus to help enhance the educational and cultural environment of the University and the community it serves.

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

The office of Grants, Research, and Sponsored Programs (GRaSP) provides various services to the campus community that include Pre-Awards activity, Post-Award grant/contract management, intramural support for faculty and student research programs, oversight of research Institutional Boards both human and nonhuman, administrative overview of Centers and Institutes, Intellectual Property, and oversight of the CSUB Auxiliary for Sponsored Programs Administration. This guide is dedicated to the Division of Pre-Awards activity relating to sponsored programs.

Pre-Awards Division

The Pre-Awards Division provides services for the development and submission of proposals for grants, contracts, and sponsored programs on behalf of both the SPA and the University. The general areas of the Pre-Awards Division are:

1. Sponsored Programs Development (Extramural)
2. Research Compliance

3.   Faculty and Student Research Initiatives (Intramural)

Role of the Principal Investigator

Necessary for Pre-Awards activity are the Faculty, staff, and administrators that serve as Principal Investigators (PIs) on proposals and projects. The PI is 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.

PROPOSAL/CONTRACT DEVELOPMENT

The Pre-Awards staff engages with PIs to identify potential funding opportunities, and reviews funding agency guidelines to determine CSUB's eligibility to participate in the funding program and ensure submissions are responsive to the guidelines. Pre-Awards staff assists with proposal development and establishes a proposal preparation timeline that meets the submission deadline. Staff facilitates collaborations with PIs as needed/requested to strengthen proposals. Additionally, staff reviews and edits proposals for content, spelling, grammar, format, accuracy, and appropriateness. Pre-Awards staff ensure the scope of work is adequate, as well as ensuring compliance with agency and university regulations.

Pre-Awards staff work with PIs to create budget and cost proposals/contracts, ensuring the use of appropriate rates, so that the funding requested is adequate to perform proposed project activities abiding by University policy and regulations. Staff review all University commitments for cost sharing for appropriateness and allowability working with PIs to complete internal and agency forms to upload into the funding agency proposal submission portal.

Pre-Awards staff also work with PIs and subcontractors when CSUB is the lead institution to procure subcontractor proposals including letters of commitment, statements of work, and budgets. When CSUB is the subcontractor, the 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.

Proposal/Contract Submission

The Division of Pre-Awards ensures compliance with applicable governmental regulations, CSU policies and sponsor guidelines regarding proposal submission. Services are provided for the preparation, approval, and submission of proposals for sponsored projects and funding provided by external federal, state, local and private governmental entities. The proposal submission pathway below provides specific milestones for faculty and staff to ensure grant submission and compliance with campus internal procedures.

Proposal Submission Pathway	
Timeframe	Milestone
2- 3 Months before Agency Deadline	- Submit a Proposal Initiation Form - Begin proposal preparation. - Review funding announcement. - Request statistical and design support from other campus offices.
4 Weeks before Agency Deadline	- Mandatory: Submit a Proposal Initiation Form. - External pre-review of Federal proposals possible.
3 Weeks before Agency Deadline	Work with Pre-Awards staff on budget, budget justification, and other proposal documents
10 Business Days before Agency Deadline	- Mandatory: Finalize budget excel template, budget justification, and draft abstract for internal review. - Complete and initiate proposal routing in Cayuse SP.
2 Business Days before Agency Deadline	Mandatory: Pre-Award will submit proposal to ensure error-free electronic submission.

Award/Contract Review And Negotiations

Upon award/contract notification, all incoming awards, contracts, subcontracts or other types of agreements are directed to the Senior Grants and Contracts Analyst (SGCA) for review. During the review process, the SGCA may negotiate terms and conditions of contracts, subcontracts, and non-financial modifications with sponsoring agencies to

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ensure accuracy and appropriateness of terms and condition so that the University, SPA, and the PI, can meet the award terms and conditions. When review/negotiation is complete, a routing package including all award/contract documents is sent to the Research Compliance Analyst (RCA) where the package is reviewed for research compliance related concerns. When cleared, and the documents are fully executed, the routing package is sent back to the SGCA and logged into an internal database then forwarded to Post Awards for review and account set up.

A summary of Senior Grants and Contracts Analyst's (SGCA) responsibilities include:

- creating contracts, agreements, and modifications for funded sponsored projects
- informs PIs of award terms and conditions
- communicates the importance of PI compliance with the terms and conditions
- works with PIs to develop statements of work, deliverables for contracts, revision of budgets, and clarification of any conflicting information

In the case that a proposal is declined, Pre-Awards staff encourages and supports resubmission based on comments made by in the agency review summary to submit an improved proposal.

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

The F&A rate from July 2023 through June 2026 is 48% for on-campus costs and 22% for off-campus costs for all programs applicable to CSUB, and the Auxiliary for Sponsored Programs,. 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.

<u>RESEARCH COMPLIANCE</u>

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

may also be required.

GRaSP offers Research Compliance services through staff working in concert with the Research Ethics Review Coordinators (RERC). The Research Compliance staff provides administrative support to the Human Subjects Institutional Review Board (HSIRB) 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 HSIRB or IACUC for review. In collaboration with the Research Ethics Review Coordinators, the Research Compliance Analyst (RCA) monitors compliance with regulations for human subjects and animal care and use.

Additionally, Research Compliance staff have oversight or monitors:

- Human Subjects Protection
- Humane Care and Use of Animal Subjects in Research
- Responsible Conduct of Research (RCR)
- Federal awards - Financial Conflict of Interest (FCOI)
- Non-federal awards - Conflict of Interest (COI)
- FCOI and COI Disclosures and ongoing compliance
- Research Security Training (RST) Program
- Unmanned Aircraft Systems Review Board (UASRB)
- Suspension and Debarment
- Export Control
- Maintenance of training records

Human Subjects Institutional Review Board (HSIRB) and Institutional Animal Care and Use Committee (IACUC) Approvals

For projects involving non-human animal or human subjects research, institutional approval is required before any data collection can commence on a sponsored project. The Human Subjects Institutional Review Board (HSIRB) reviews and approves Expedited (two members) and Standard Reviews (full board) that present more than minimal risk to participants. It is the responsibility of the Human Subjects Research Ethics Review Coordinator (RERC Human Subjects) to review and approve the lowest level of risk protocols (Exempt from Full Board Review). For non-human animal

research, all protocols are reviewed and approved by the Institutional Animal Care and Use Committee (IACUC).

Research Ethics Certifications (RCR)

In line with federal regulations and the CSUB Responsible Conduct of Research (RCR) certification process, PIs, Co-PIs, post-doctoral students and student assistants participating/working on research projects must receive training and earn 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 obtain a certificate before they start activities of the 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 Post Awards.

Federal Awards

When notified of a federal award, the RCA directs PIs and Co-PIs to complete the CITI Program FCOI course. The RCA then verifies completion of training maintaining a log. Certificate of completion should be maintained by PI's and Co-PIs for their records. Training is valid for 4 years and must be kept current for the life of the project. Research

Non-Federal Awards

When notified of a non-federal award or the assignment of a replacement PI on an existing non-federal project, the RCA communicates with the CSUB COI Filing Office who assigns the PI and Co-PI to the Conflict of Interest training course within 60 days' time. On a monthly basis, the RCA verifies that PI's and Co-PIs have completed the applicable training. Training is valid for 2 years and must be kept current for the life of the project.

Research Security Training (RST)

Federal Research Security Training (RST) fulfills the requirements of NSPM-33 and the CHIPS and Science Act. Select federal agencies mandate RST for PIs, Co-PIs, and key personnel. The RST consists of 4 modules covering: Research Security, Disclosure, Risk Mitigation, and International Collaboration and is provided by NSF and is required

annually. Pre-Award staff oversees the RST program to ensure PIs, Co-PIs, and key personnel complete the mandated training. Pre-Awards staff are responsible for ongoing compliance and the maintenance of RST records.

Unmanned Aircraft Systems Review Board (UASRB)

The Unmanned Aircraft Systems Review Board (UASRB) is charged with authorizing the use of small, unmanned aircraft systems (sUAS) for use on University property, and for other university-related purposes off campus to ensure that CSUB complies with all applicable local, state, and federal rules, regulations, statutes, and laws. If an sUAS purchase and or use is included in a sponsored project, the PI must comply with the policy and procedures of the UASRB as well as comply with agency specific mandates. All sUAS are required to be registered with the office of GRaSP. GRaSP staff process all incoming drone registrations and flight requests and is responsible for ongoing compliance and maintenance of UASRB records. Approval of flights are performed by the board.

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 within the proposal routing and is reviewed by Pre-Award staff. Subsequently, staff independently verify PI's and Co-PIs for no suspension and debarment via the Descartes Visual Compliance platform. If debarment or suspension is found, no participation on federal awards is allowed. However, if the award is nonfederal or private funding, the agency is notified of the finding to determine course of action. Debarment or suspension clearance documents remain part of the proposal routing package.

Export Control

Export Control is a university-wide function and responsibility that has impact across multiple areas and offices of the campus and can involve CSUB PIs, Co-PIs, research assistants, as well as visitors, collaorators, and other outside agencies or personnel. Pre-Awards development is only one area impacted by export control regulations. Pre-Awards complies with federal laws and regulations governing exports and ensures that compliance is consistent with the CSU Research Administration Policy.

As part of the proposal routing procedure, PI's are required to attest to export control concerns for all personnel during the proposal phase. PI's document their response within the proposal routing to be reviewed by Pre-Award staff. Subsequently, staff independently verify PI's and Co-PIs for export control concerns. If export control is flagged, staff make a referral to the university export control committee to address export control concerns.

FACULTY AND STUDENT RESEARCH INIATIVES (Intramural)

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

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 distributed 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). It is the responsibility of the GRaSP office to implement and manage the program.

Travel Support for Student Research (TSSR) Program

Funded by the Office of the President, the Travel Support for Student Researchers (TSSR) Program provides 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. Reimbursement is made to students using university travel forms and guidelines. It is the responsibility of the GRaSP office to implement and manage the program.

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 sponsorship. 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. It is the responsibility of the GRaSP office to implement and manage the program.