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Owner Chandra Khan  
Area Academic Affairs  
- Research and  
Sponsored  
Programs

## Policy on the Administration of Externally Sponsored Projects

### Purpose:

California State University, East Bay and California State University, East Bay Foundation, Inc. agrees to comply with all federal, state, CSU, and auxiliary policies governing the administration of externally funded sponsored programs.

### Policy Statement:

The Office of Research and Sponsored Programs (ORSP) is designated to work with the Principal Investigator(s), the associated Department and College officials, and the Financial Services Department within the Division of Administration and Finance to administer and account for the use of funds provided and the performance of the Sponsored Program.

### Policy Scope:

Pre-award processes include but are not limited to activities the Principal Investigator (PI) and University engage in prior to obtaining funding. Post-award processes include activities the PI and University engage in after securing funding. Compliance helps mitigate the risk the University incurs while managing a variety of awards. Pre-and Post-Award activities are interwoven and bound by compliance related activities. Compliance, Pre-and Post-award functions and staff are located within ORSP.

#### Pre- and Post-Award Roles and Responsibilities:

The Principal Investigator (PI) is identified in the proposal as the individual responsible for the overall fiscal, administrative, and scientific/programmatic conduct of a project. PIs are responsible for communicating to ORSP about the details of the proposed budget and narrative, and completing any forms or requirements prior to submission. If funded, PI's will be responsible for the day-to-day project

management and accept responsibility for carrying out commitments outlined in the proposal and / or award document within the time limits and budgetary resources provided, and for complying with University and sponsor policies and procedures related to the administration of funds, including completing forms and required training, and the submission of technical reports. The PI's Department Chair, College Dean, and/or Department or Division Supervisor are responsible, as directed by the Provost's Office, for reviewing and approving proposed work prior to acceptance of an award, as well as any amendments to grants/contracts once funded.

The Associate Vice-President (AVP) of Research oversees the ORSP. The AVP works with ORSP staff and University Officials to direct internal research capacity building, and develop a strategic plan for research. The AVP also leads PI/PI Advisory Committee meetings, represents ORSP in the Academic Senate's Committee on Research and at CSUEB system-wide and professional organizations, and works with other campus officials with developing community partnerships. The AVP is also the Institutional Official for IACUC, IRB, and the submission of proposals.

The Director of Grant Administration oversees Pre-Award & Post-Award staff and assists PIs, Faculty, and staff with complexities of pre- and post-award administration, and works with ORSP staff to develop training opportunities to the campus community. The Director also provides ORSP approval for applications prior to submission, and ORSP approval for the acceptance of an award and amendment to an award, and also coordinates development of continuous improvement, policies, procedures, protocols, etc. affecting day to day grant administration. The Pre-Award Team assists investigators with proposal development and submission to sponsors. In addition, they help communicate to investigators any forms or training to be completed at the pre-award stage, including but not limited to conflict of interest, subrecipient identification and budgeting, human subject or use of animals in research, faculty release or additional compensation budgeting, issues surrounding international collaborations, and various other pre-award related issues.

The Pre-Award Team consists of the following:

The Grant Strategy Officer assists with proposals to private funders, and works with investigators with funding opportunity identification and analysis. The Grant Strategy Officer partners with University Advancement to engage private funders, cultivate relationships, and help with the negotiation of terms and conditions, as well as grant reporting and stewardship of private funds. There is also a partnership with UA on capacity building, systems, policies, procedures and training.

The Senior Grant Proposal Coordinator helps with interpreting governmental and general guidelines for investigators and ensures proposals meet requirements. The Senior Grant Proposal Coordinator also assists with funding opportunity identification and analysis, proposals to government sponsors, and timelines, required documentation, the routing process, as well as facilitating and conducting special training sessions. The Pre-Award Specialist assists with grant proposal development, routing, submission, and coordinates and facilitates the proposal to grant award transition process. The Specialist also prepares reports and presentation materials to support and highlight the pre-award services of ORSP.

The Post-Award Team serves as a resource for post-award issues for PIs and their staff. They communicate to investigators regarding forms or training to be completed at the post-award stage,

including but not limited to conflict of interest, subrecipient processing and payments, release time reimbursements to colleges, faculty additional compensation payments, staff and student payments, and various other post-award related issues.

The Post-Award Team consists of the following:

The Post Award Specialist coordinates the grant account set-up and award orientation, and facilitates the processing of faculty release time, and the review of expenditures. The Specialist provides expense analysis and budget projections for grants, assists with budget revisions, extensions, financial reports, and closeouts. The Specialist provides expense analysis and budget projections for grants, assists with budget revisions, extensions, financial reports, and closeouts. The Post Award Team ensures that University and all investigators comply with the applicable laws, regulations, policies, and procedures related to grant funding, including but not limited to conflict of interest, subrecipient monitoring, additional compensation to faculty, human subjects and animal use in research, and various other compliance related issues.

The Compliance Specialist assists with facilitating independent contractor and subcontract agreements and cost share certification, provides pre-and post-award compliance and risk review, subrecipient risk assessment and monitoring, produces effort certification reports and data metrics reports, and is one of the main liaisons with Accounting, Finance, and Procurement.

The Grant Administration & Compliance Specialist facilitate award and amendment approval routing, conducts new award orientations, and facilitates post-award functions such as faculty additional employment and reassigned time processing, travel and hospitality review, and closeouts.

The Office Manager is the initial point of contact for ORSP assistance, providing support for office management, ORSP budgeting, faculty support grants, and support to the AVP ORSP and the ORSP Advisory Committee.

The Research Compliance and Subcommittee Specialist provides administrative support to the IRB, IACUC, and UAS committees and committee functions, such as processing of animal use applications for IACUC, human subject protocols for the IRB, and flight use applications for the UAS committee, and supports compliance with laws and regulations, as well as AVP support for compliance areas such as Fiscal Conflicts of Interest, International Agreements, and Export Control.

The Academic Affairs, Academic Resources and Planning, Director of Compliance and Standards provides cross-departmental compliance guidance on federal, state, and local regulations, policies, procedures, assists with training, liaisons with university Risk Management and internal and external auditors, and provides review and guidance on institutional approval of grant awards, contracts, subcontracts.

Center for Student Research:

The Center for Student Research Director oversees the Center for Student Research (CSR), developing professional and researcher-specific development workshops for CSR students, directing CSR student research or creative activity travel and supply support, and coordinating the CSUEB Student Research Symposium and CSU statewide Student Research Competition, and graduate school preparation and information.

The Center for Student Research Coordinator provides administrative support for Center for Student Research and faculty affiliated with ORSP, providing documentation, budgeting and accounting, and narrative and fiscal reports to ensure compliance with university and sponsor requirements.

Other Campus Units:

In addition to PI's, the Office of Research and Sponsored Programs interacts frequently with other campus offices and departments to oversee the administration of externally funded grants:

An assigned Foundation Accountant in Administration and Finance assists ORSP with the accounting and fiscal management of funded awards. The Accountant also assists with generating and sending invoices to sponsors. ORSP works frequently with various offices in Administration and Finance, including Procurement, Accounts Payable, the Finance Support Unit, Bay Card, and the Cashiers and Student Finance with regards to various payments to individuals, vendors, and other entities.

Additionally, ORSP interacts with Human Resources and Payroll and within Academic Affairs for issues related to grant-funded CSUEB employees, faculty payments, and verifying faculty do not exceed their 125% effort limitation. ORSP works with the Academic Departments, College Deans, and/or Department or Division Supervisors for approvals related to proposals/awards/amendments, as well as any issues to be resolved with any funded projects. ORSP communicates with Risk Management regarding insurance for projects, award and contract clauses, and with Risk Management's Office of Environmental Health and Safety; as well as with Financial Aid on any student related payments and scholarships.

## **Exclusions:**

N/A

## **Definitions:**

None

## **Procedures:**

None

## **Enforcement:**

Federal, State, and local regulations and sponsor terms, conditions, and guidelines require that the university and ORSP staff ensure compliance with said regulations and guidance. Enforcement for regulations not followed may include, but is not limited to, suspension of project activities, disallowance of expenditures, or other enforcement as mandated by federal, state, and local regulations.

## **Related information:**

[CSU Policy - Sponsored Programs Award Acceptance and Negotiation](#)

[C.O. Policy: Sponsored Programs Financial Conflict of Interest for Investigators](#)

[CSU Sponsored Programs Policy Definitions](#)

[Amendments Procedures](#)

[Allowable Cost Matrix](#)

The [Office of Research and Sponsored Programs Pre-Award and Post-Award staff](#) assist employees with training and compliance during proposal routing, submittal, and during award performance periods.

## Authority:

- [2-CFR-200](#)
- [CSU Policy](#)

## Policy Contact:

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### Attachments

[Allowable Cost Matrix-attachment-for-ORSP-Externally-Sponsored-Programs-Policy.pdf](#)

### Approval Signatures

**Step Description**

**Approver**

**Date**

Walt

08/2022

Chandra Khan

05/2022