Welcome!

Marcia Smith
Associate Vice Chancellor for Research
Agenda

• Welcome and Announcements - Marcia Smith
  ▪ ORA Move Update

• OARO Update - Jennifer Perkins
  ▪ Rebranding OARO to RSAWA (Research Safety and Animal Welfare Administration):

• EFM Update
  ▪ PAMS Go Live - Jennifer Aguilar
  ▪ Financial Closeout of Sponsored Projects – Yoon Lee

• OHRPP - Kip Kantelo
  ▪ Update on NIH Single IRB Policy, Basics of IRB Reliance

• RPC Update
  ▪ Export Control - Claudia Modlin
  ▪ NIH Requirement for Good Clinical Practice Training – Ann Pollack

• OCGA Updates
  ▪ EPASS Changes – Patti Manheim
  ▪ FDP Reports – Cindy Gilbert
ORACLE Move Updates

- ORA Logistical Information

<table>
<thead>
<tr>
<th>ORA Logistical Information</th>
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<tr>
<td>Physical Location</td>
<td>10889 Wilshire Blvd Los Angeles, CA 90095</td>
</tr>
<tr>
<td>Campus Mailing Address</td>
<td>10889 Wilshire Blvd, Suite XXX Mail Code: 140648</td>
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<td>Phone Number and Email Address</td>
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## ORA Move Update

### ORA Unit Locations

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<td>Business and Financial Services (OBFS)</td>
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<td>Contract and Grant Administration (OCGA)</td>
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<td>Research Data Management (ORDM)</td>
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<tr>
<td>Research Information Systems (ORIS)</td>
<td>8</td>
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ORA Move Update

- Transportation to 10889 Wilshire ("Wilshire Glendon") Building

  - To accommodate campus visitors, the UCLA Wilshire Express BruinBus northbound now stops at Lindbrook Drive (behind Hammer Museum and across from “Pete’s Coffee”) and stops on Westwood and Lindbrook going southbound (at “Ike’s Sandwich,” diagonally across from Wilshire Glendon Building)
RESEARCH ADMINISTRATION

Extramural Fund Management
January 12, 2017
Today’s Topics

- PAMS Go Live
- Financial Closeout of Sponsored Projects
Post Award Management System (PAMS)

Jennifer Aguilar
Post Award Management System (PAMS)

- A central web-based system that provides campus administrators with tools to facilitate effective and efficient financial management of sponsored research awards from the start to the closing of funds.

- Displays near real-time data from the financial system in a post award context for fund managers to review, edit, and approve financial activities on-line.

- Allows fund managers to communicate the status of financial activities and financial deliverables in real time within a single system.
Benefits of using PAMS

- Customized department worklists
- Facilitates on-time submission of invoices and financial reports
- Stores invoices and financial reports, along with correspondence and historical information in a single integrated system
- Facilitates the fund closeout process
- Allows tracking of internal turnaround times for preparation and approval of invoices, financial reports, and closeout processes
PAMS is Live for Campus!
Composition of PAMS Go-Live

- 108 Clusters
- 7,188 Funds
- 481 Users
- 282 Departments
PAMS Cluster

- A single, or a group of department codes, where Department Administrator(s) and staff for such units are responsible for managing sponsored research funds

- Department Administrator’s responsibilities include managing the fund closeout process and assigning tasks to staff within their cluster
<table>
<thead>
<tr>
<th>Cluster Name</th>
<th>Number of Funds</th>
<th>Number of Departments</th>
<th>Number of Users</th>
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<td>Pediatrics</td>
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<td>13</td>
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<tr>
<td>Physics &amp; Astronomy</td>
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<tr>
<td>Electrical Engineering</td>
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<td>1</td>
<td>10</td>
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<tr>
<td>EPSS, IGPP, iPLEX</td>
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<td>4</td>
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<tr>
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</table>
Completed Closeout Packets

Completed by 80 Departments as of January 3rd, 2017
Fund Search: Reports

- Closeout packets due over a period of time
- Status of closeout packets submitted
- Demographic information for funds assigned to you

### Search For Funds

<table>
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<tr>
<th>FILTERS</th>
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<tbody>
<tr>
<td>From Due Date:</td>
<td>To Due Date: 01/01/2017 - 01/31/2017</td>
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<tr>
<td>Select data to download:</td>
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</tr>
<tr>
<td>Deliverables</td>
<td>Report of completed and outstanding Invoices and Financial Reports due to sponsor.</td>
</tr>
<tr>
<td>Closeout Packets</td>
<td>Report of completed and outstanding Closeout Packets that are due.</td>
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</table>
| Missing Managing PI            | These results indicate that the following Account and Cost Center combinations have a blank Managing Investigator field in the AC table in OASIS. When the Managing Investigator is blank, PAMS cannot create a Closeout Packet. Please take the following corrective actions:
   1. If there is one PI associated with the combination please reach out to General Accounting to have this updated in the AC table. Once this is completed PAMS will create the Closeout Packet overnight.
   2. If there is no PI or there are multiple PIs associated with the combination please reach out to PaySrcHelp@research.ucla.edu to have the Process COP Option for this fund changed to "Upload RAPID COP Through Portal".|
Three worklist views

- My Action Required: action is required by the user to complete invoices, financial reports, or closeout packets

- My Responsibility: invoices, financial reports, and closeout packets assigned to the user (not necessarily requiring action)

- My Team’s Responsibility: Users with the role of Department Administrator can view financial deliverables and closeout packets for their cluster or team
Worklist View: My Action Required

Invoices and Reports Due to Sponsor

- Pending Department Action - Invoices and Financial Reports that require department input to submit the deliverable to the sponsor by the deadline
Worklist View: My Action Required

Invoices and Reports Due to Sponsor

- Deliverable Comments indicate information to be submitted to EFM
Closeout Packets

- Submission of the final financial deliverable requires users’ action of completing closeout packet.
# Financial Deliverables

- Invoices and financial reports due for each fund, status of submission
- View and download copies of submitted invoices and financial reports

## Deliverable List

<table>
<thead>
<tr>
<th>Deliverable Schedule</th>
<th>Edit Schedule</th>
<th>Due Date</th>
<th>Category</th>
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<td>Once</td>
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<td>COF Not Started</td>
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<td>07/31/2014</td>
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Upload Closeout Packets via PAMS

Fund Details

- Track status of the closeout packet submission process

Fund Balance and Approvals

<table>
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<tr>
<th>Approvals History</th>
<th>Approval Comments:</th>
<th>Revise</th>
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<tr>
<td>Dept Preparer Joe Bruin</td>
<td></td>
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<tr>
<td>Dept Approver Josie Bruin</td>
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<tr>
<td>PI Professor Jones</td>
<td></td>
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<tr>
<td>EFM Preparer Sue Smith</td>
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<td></td>
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<tr>
<td>EFM Approver Jason Johnson</td>
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- Approved by Joe Bruin on 12/08/2016
- Approved by Josie Bruin on 12/20/2016
- RAPID COP has been Uploaded
- Approved by Sue Smith on 12/20/2016
- Approved by Jason Johnson on 12/21/2016

Comments for: Approvals History

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<tr>
<th>Username</th>
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<tr>
<td>Joe Bruin</td>
<td>12/21/2016 11:28 AM</td>
<td>COP Approved</td>
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<tr>
<td>Josie Bruin</td>
<td>12/20/2016 02:16 PM</td>
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<td>Sue Smith</td>
<td>12/20/2016 10:07 AM</td>
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<tr>
<td>Jason Johnson</td>
<td>12/08/2016 07:50 AM</td>
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PAMS Training

- In-Person Training Session for new users:
  - Thursday, January 26th 9-11am
  - To register, complete the Doodle poll: [http://doodle.com/poll/xbwvqd44d2m2s7i3](http://doodle.com/poll/xbwvqd44d2m2s7i3)

- Webinar: Closeout Packet Management Grid
  - February 2017
  - Details will be emailed to the PAMS Listserv
Resources

- **PAMS Help**
  - (310) 794-0008, pamshelp@research.ucla.edu

- Visit the [PAMS](http://ora.research.ucla.edu/EFM/Pages/PAMS/Overview.aspx) website for more information including:
  - Training materials, Quick Guides, Videos
  - Adding new users, common FAQ’s
Thank you!

<table>
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<tr>
<th>Project Team (ORA)</th>
<th>Department Feedback</th>
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<tbody>
<tr>
<td>Jackson Jeng</td>
<td>Lynette Hand (Physiology)</td>
</tr>
<tr>
<td>Yoon Lee</td>
<td>Cathy Rujanuruks (DOM)</td>
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<tr>
<td>Noor Abjani (Physiology)</td>
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<tr>
<td>Jennifer Aguilar</td>
<td>David Islas (Pathology)</td>
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<td>Jonathan Hamilton-Solorzano</td>
<td>Gina Ruiz (Neurology)</td>
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<tr>
<td>Salini Alluri</td>
<td>Allison Kamerman (Public Health)</td>
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<td>Isabella Hernandez</td>
<td>Marvin Selga (Education)</td>
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<td>Kathy Chang (Physics)</td>
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<td>Alfredo Arcilla</td>
<td>Christine Lavoie (NPI)</td>
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<td>Barbara Cooke (Epidemiology)</td>
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<td>Katie Cadle</td>
<td>Wendy Ma (Surgery)</td>
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<td>Gabriela Macias</td>
<td>Tracey Wong (Neurology)</td>
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<td>Rio Cruz (Pathology)</td>
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<td>Stephanie De Marco</td>
<td>Michelle Phillips (NPI)</td>
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<tr>
<td>Dan Newbower</td>
<td>Lee Yang (Engineering)</td>
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<td>Cassandra Franklin (Engineer)</td>
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<tr>
<td>Wai Fok</td>
<td>Shirley Rayner (Psychology)</td>
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<tr>
<td>Mila Remigio</td>
<td>Joanne Yung (Social Sciences)</td>
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<td>Maria Guerrero (Engineering)</td>
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Financial Closeout of Sponsored Projects

Yoon Lee
Enhanced financial closeout procedure for sponsored projects is now effective.

**September 2016:**
- Announced that new procedure was under development with a target effective date of January 1, 2017 to further strengthen financial closeout process with two main goals:
  - To ensure timely submission of the final financial deliverable to the sponsor
  - To ensure full and timely recovery of costs incurred for sponsored projects
- Introduced key processes and changes in the new procedure

**October 2016:**
- Introduced new closeout packet reminders under new procedure
- Published a draft of procedure for campus feedback

**November 2016:**
- Closed public comment period
- Announced that the new procedure will go in effect January 1, 2017 as planned

**January 2017:**
- Announced that the new procedure is now effective starting January 1, 2017
Procedure Overview

At a high level, the new fund closeout procedure is same as the federal fund closeout procedure implemented in May 2015.

- Closeout packet due date reminder is sent to the department.
- When a closeout packet is submitted to EFM on time, no change to existing practice.
- When a closeout packet is not submitted to EFM on time, EFM will proceed to prepare the final financial deliverables.
  - EFM will start from expenses per the general ledger and exclude transactions that are considered questionable based on sponsor’s and university’s policies and guidelines in absence of proper documentation.
  - EFM will inform the department of the final expenditure per EFM’s analysis and ask for department’s confirmation by a certain due date.
  - When a response from the department is not timely or incomplete, EFM will proceed to submit the final financial deliverable based on EFM’s analysis.
  - The department will be financially responsible for expenses not included in the final due to absence of a closeout packet and/or untimely communication.
- The department is required to submit a revision request form with explanation of causes for errors in the original final and corrective action plan when a revision of the final is needed.
When a COP is not submitted

- **EFM’s analysis will exclude**
  - Unallowable expenses per sponsor’s guidelines or award specific terms and conditions
  - Expenses incurred outside the performance period
  - Undocumented questionable expenses

- **Questionable expenses include expenses with warning object codes**
  - Updated object code restrictions are available at GA website: [http://ga.accounting.ucla.edu/displaypdf.aspx](http://ga.accounting.ucla.edu/displaypdf.aspx)
  - A new version of RAPID closeout packet tool, incorporating updated object code restrictions, is available on the ORA portal (version dated 01/03/2017)
  - Types of transactions that might have significant adverse financial implications include “Administrative salaries” and “Equipment purchased late” on federal and federal pass through funds in absence of appropriate documentation.
When a COP is not submitted

- **Upon receipt of EFM’s analysis of final expenses to be reported to the sponsor**
  
  - Department is required to review and confirm the final expenses by the due date indicated in the email.
  
  - Department’s response is not received by the due date or incomplete response is provided for EFM to conduct meaningful review, EFM will proceed with submitting the final based on EFM’s analysis.
  
  - Important due dates for key communication between Department and EFM are posted in the “Closeout Deadlines” under “Fund Closeout” section in EFM Website.
Resources

- Fund Closeout section on the EFM website has been updated to provide further guidelines for the new procedure.
- Resource page includes a complete procedure document including appendices.

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**Overview**

Fund closeout is the process by which the University determines all allowable and applicable sponsored projects costs. If at the end of the project period, the Principal Investigator has requested an extension, the fund closeout process must be conducted. Upon award expiration, final financial documents or sponsors policy manual are to be completed. It is important that all requirements for compliance can lead to financial loss and places the University at risk. If the project is declared closed, all financial reports and invoices to sponsors will be enforced and applicable sponsored projects costs.
Contact information

EFM Website

http://ora.research.ucla.edu/EFM/

Yoon Lee

X40375

yoon.lee@research.ucla.edu

Jennifer Aguilar

X42846

jennifer.aguilar@research.ucla.edu

PAMS Help

x40008

PAMSHelp@research.ucla.edu
NIH Policy on Single IRBs

- Policy coming this month released in June ‘16
- Effective for Jan May Sept 25
- Domestic sites of multi-center
- Applications to identify cIRB
  - Coordination plans & personnel
  - Certain direct costs allowable
- IRBrelly *SmartIRB* framework in development
NIH Policy on Single IRBs

❖ What to Do If UCLA Will Be Lead
  • Contact irbreliance@research.ucla.edu
  • Provide preliminary info re project and sites involved

❖ What to Do if UCLA Will Rely
  • Instructions regardless of funding source
  • Regardless of which IRB will review
If UCLA Will Rely

- **Contact OHRPP**
  - [irbreliance@research.ucla.edu](mailto:irbreliance@research.ucla.edu)
  - which IRB?

- **OHRPP will:**
  - Check if an agreement is in place
    - Initiate negotiations if new agreement needed
  - Request relevant project info
If UCLA Will Rely

PI will:

• Complete local context form
  - OHRPP will assist
• Make local revisions to consent
  - Checklist available on OHRPP website
  - OHRPP will review
• Initiate registration in webIRB
  - Truncated application
  - For tracking, follow-up and downstream services
  - Do not submit yet (unless Radiation)
If UCLA Will Rely

- **webIRB Registration**
  - Complete sections 1.1, 1.1a, 1.1b, 1.2 and 1.3
  - In Section 2.1, Item 4.0 select “UCLA to Rely on Another IRB”
  - This will present a truncated set of pages
    - These will help PI/study team identify needed ancillary reviews (e.g. Radiation)
    - Don’t forget training!
If UCLA Will Rely

- After Reviewing IRB Approves, submit webIRB registration
  - Complete Sections 4.1 and 4.2
  - Attach IRB-approved documents
- OHRPP will issue “External Review Accepted” notice
  - Expiration date will track IRB’s
  - Don’t forget other approvals
  - Post-approval communications governed by agreement
Thank you!

- For questions:
  - Reliance
    - irbreliance@research.ucla.edu
  - North & South General IRBs
    - x57122
    - gcirb@research.ucla.edu
  - Medical IRBs
    - x55344
    - mirb@research.ucla.edu
Export Controls Update

Claudia Modlin, Assistant Director
Research Policy and Compliance
January 12, 2017
Ann Pham
Export Control Administrator
310-206-3727
ann.pham@research.ucla.edu
Traveling to Cuba?

Please proceed to the check-in counter located on LEVEL 2, DOOR 5 for check-in.
Travel to Cuba

A number of things have changed in the past year:

1. Cuba is no longer considered a State Sponsor of Terrorism.
2. Diplomatic relations between the US and Cuba have been reestablished.

However, to visit Cuba, an individual must either fall within the 12 categories of authorized travel (the general license) OR obtain a specific license (case-by-case determination that requires submitting an application to the Office of Foreign Assets Control (OFAC).

The authorization also allows for some travel related transactions that previously required a specific license.

OFAC has published FAQs about this at: http://www.treasury.gov/resource-center/sanctions/Programs/Documents/cuba_faqs_new.pdf
Categories of Authorized Travel:

1. family visits
2. official business of the U.S. government, foreign governments, and certain intergovernmental organizations
3. journalistic activity
4. professional research and professional meetings*
5. educational activities (including “people to people contact”)*
6. religious activities
7. public performances, clinics, workshops, athletic and other competitions, and exhibitions
8. support for the Cuban people
9. humanitarian projects
10. activities of private foundations or research or educational institutes
11. exportation, importation, or transmission of information or information materials

*categories most frequently used at UCLA
Revised rules for “people to people” educational activities

• Travelers utilizing this general license must ensure they maintain “a full-time schedule of educational exchange activities intended to enhance contact with the Cuban people.”
• Previously, people to people activities had to be organized and conducted by companies licensed to do so by OFAC.
• Now, individuals and organizations not specifically licensed by OFAC can organize such activities and travel under the general license.
• However, they must retain records documenting all authorized travel transactions, including records demonstrating a full time schedule of authorized activities.
• At UCLA, this license has been used for travelers who do not have the specific academic credentials that would qualify them for the professional research or the other educational activities categories.
Iran Update

• At a recent university export control meeting in Washington DC, an OFAC official publicly stated that an OFAC license IS required for faculty attending and/or presenting at conferences in Iran.

• Conference attendees/presenters may be considered to be receiving and/or providing a “service.” These “services” may require licensing under the Iranian Transactions Regulations (31 C.F.R. Part 560).

• The need for a license will be determined on a case-by-case basis. Note that OFAC takes a very long time to process these requests.

• In addition, any travel to Iran for research purposes normally requires an OFAC license.
This is what a researcher sent my colleague when she let him know his OFAC license to travel to Iran was approved.

https://youtu.be/IUZEtVbJT5c
Good Clinical Practices

Ann Pollack
Assistant Vice Chancellor – Research
Research Policy and Compliance
January 12, 2017
Good Clinical Practices

- A set of ethical and scientific quality standards for designing, conducting recording and reporting clinical trials.

- In September 2016, NIH issued a policy that established *the expectation* that NIH-funded investigators and staff who are involved in the conduct, oversight or management of CTs should be trained in Good Clinical Practices.
Good Clinical Practices

- The Policy was *effective as of January 1, 2017*

- NIH does not expect all training to be completed January 1 as long as steps are being taken to meet the training expectation.
Good Clinical Practices

- Identifying courses that cover recommended materials, are easy to access, and where completion can be readily tracked

- Designing a process that is not overly burdensome

- Focusing first on meeting NIH policy expectations

- Aware that some campus units may want to extend GCP training beyond NIH awards.
Good Clinical Practices

• Most likely will rely primarily on the GCP course available through the Collaborative Institutional Training Initiative (CITI) site. *

• Recognize the need to also identify a course that is oriented toward behavioral studies.

*UCLA already uses CITI for human subject and animal research training.
Good Clinical Practices

• Conferring with the campus clinical research community

• Drafting campus guidance

• Answering questions as they arise