## OFFICE OF SPONSORED RESEARCH DESKTOP PROCEDURES
## CREATING OR AMENDING A SUBAWARD AGREEMENT

### 1.0    Tracking Subawards – General Information

OSR staff uses the Sponsored Projects Office (SPO) Log and the Subrecipient Database to log transactions.

- The SPO Log is used to track and monitor progress on transactions related to Subawards. This includes proposals, awards, gathering paperwork, negotiating with sponsors, reviewing terms and conditions, ensuring compliance approvals, handling of waivers, etc.
- The OSR Subrecipient Database on the S Drive is the main repository for the collection of information about Stanford's Subrecipients and Subawards.  It includes individual records for each requisition received by OSR, and acts as the auditable record for each requisition.

### 2.0    Intake of Requisitions
                    [Central Intake Administrator/Administrative Associate]

To initiate a new subaward or amendment, the department/PI must submit a purchase requisition via iProcurement, which will then be received by the Procurement Department. The Procurement Department's Contracts Office verifies the nature of the requisition and faxes subaward requisitions to the appropriate OSR team. One OSR representative for each school-based team is listed as Buyer in iProcurement.

2.1    Log each requisition in SPO Log with appropriate transaction type (SAN or SAA)

- See **Appendix A** for instructions on accessing the SPO Log.
- Number new Subawards using the initial Requisition Number from Procurement plus the SPO Number plus an alpha (A for the first Subaward under a given project, B for the next one, etc.). Example: 12345670-54321-A (Requisition No.-SPO No.-Alpha).
- Requisitions for amendments on existing Subawards will use the same Subaward number as the original agreement.
- The Subaward number, Subrecipient name, and current requisition number should be inserted in the first page of the SPO log entry, under "Protocol Name" (or "Protocol #" if more space is needed).

2.2    Log each requisition in the Subrecipient Database

- See **Appendix A** for instructions on accessing the Subrecipient Database.
- Open the Subrecipient Database, create a new entry, and insert all available information into the new database entry. See **Appendix E** for required fields.
- Pull prime contract or grant file and give it to the Contract & Grant Officer assigned to the department requesting the subaward, along with the Subaward file.

If no Subaward file exists, see Section 3 for instructions on Subaward file creation. If a four-flap file is being used for an existing Subaward, transfer into a six-flap file using organization listed in Section 3.

**3.0     Prepare the Subaward File**
                        [Central Intake Administrator/Administrative Associate]

Use red classification folder with two dividers (six flaps).

3.1     Filing Order for Subaward Files
  • File Flap 1: Agreement and Amendments in reverse chronological order (most recent on top) with the Summary Sheet on the top (this should include Prime Award at Attachment B)
  • File Flap 2: Internal (SU) Correspondence with most recent SPO Log status page on top
  • File Flap 3: Requisitions and corresponding Subrecipient Database entries in reverse chronological order
  • File Flap 4: Subrecipient Correspondence
  • File Flap 5: Compliance Documents, including A-133 Audit documentation, OSR Form 33, IRB Approvals, OSR Form 45 or 46, etc.
  • File Flap 6: Stanford Notices of Award with appended Prime Agreement and/or Sponsor Agreement, Subrecipient proposal

3.2     File Label
Print labels with the following information:
  • Line 1:  PI name (Last, First); Subaward Number
  • Line 2:  Department name, Prime funder
  • Line 3:  Name of Subrecipient organization
Label template is located in S Drive (S:/Templates/Miscellaneous Templates/Labels – files.doc)

3.3     File the Subaward file with the prime sponsor files or in accordance with your OSR team procedures.

**4.0     New Subawards**      [Assigned Officer]

4.1     Review the Requisition

Read the requisition to ascertain what action is being taken. Is this a new subaward, a modification, or a no-cost extension? Verify that the following information is identified on the requisition:
  • Expenditure types for subawards are 54710 (subject to IDC, under $25K threshold) and 54720 (exempt from IDC, over the $25K threshold)
  • Subrecipient name and contact information for PI and authorized official
  • SPO Number of prime award
  • Prime sponsor and grant number

- Transaction type (i.e, new award, additional time, additional money, reduction of budget, etc.)

If additional information or corrections are needed, contact the department contact listed on the requisition. The department contact will ask Procurement to return the requisition for revisions.

4.2    Verify that the scope of work of the requisition meets the criteria of a Subaward. In some cases, the determination of whether the scope of work should be a Subaward or other purchasing action (such as vendor or consulting agreements) may be complex.  In cases where the proper designation is not obvious, the Subaward Determination criteria in the Research Policy Handbook, Section 3.7, should be utilized as an aid in making the determination.

- If the verification process requires escalation to a manager, add correspondence to the Subaward file detailing the decision process and outcome.
- In the Subrecipient Database entry, select the box marked "Confirmed Sub" once the status as a Subaward has been verified.
- If the scope of work does not meet the criteria, inform the department/PI of the determination of the agreement type. Return the requisition to Procurement for processing as an alternate agreement type, and select the box marked "Req Terminated" and complete the "Date Sent to Procurement" field in the Subrecipient Database entry.

4.3    Verify that Subrecipient and Subrecipient PI are not excluded or debarred. See **Appendix A** for instructions on accessing the Excluded Parties Listing System (EPLS).

4.4    Initiate a new Subaward

Pull prime SPO file to retrieve any existing documentation. If SOM Subaward under a grant, request the prime SPO file from RMG. The following documents must be reviewed and are **required** prior to starting the subaward:

- Subrecipient's scope of work and any required deliverables
- Subrecipient's budget and budget justification
- Completed and signed Subrecipient Commitment Form, OSR Form #33 (and related attachments)

If the existing materials do not reconcile with the award or the requisition, contact the department to confirm accuracy and currency of Subrecipient's budget, budget justification, and statement of work. The funding amount on the requisition and the budget must be the same.

Obtain the following from the department or Subrecipient and review:

- Sole Source Justification, OSR Form #32 (if applicable) – Required if Subrecipient was not part of the original proposal or if the Subaward is issued under a contract; the Stanford PI must justify the Subrecipient's participation in the research

- Fair and Reasonable Cost Analysis Form, OSR Form #45 (Subaward under Contract) or OSR Form #46 (Subaward under Grant) – Stanford PI must certify that s/he has reviewed and approved Subrecipient's proposed costs.
- Subrecipient's A-133 audit documentation or OSR Form #47 (Audit Certification and Financial Status Questionnaire) for Subrecipient's most recent fiscal year
- Current Human Subjects/Animal Subjects approval, if applicable
- Other forms required by the Prime Sponsor, if applicable

Please note that the Sole Source Justification form and Fair & Reasonable Cost Analysis forms do not apply to Subawards under Clinical Trials.

4.5     Conduct Subrecipient Risk Analysis using the template spreadsheet (S:/Risk Analysis/Subrecipient Risk Analysis Template). Calculate the risk score, which will determine which agreement template should be used and if cautionary language inserts may be needed. See **Appendix B** for instructions. Print and file a hard copy of the Subrecipient Risk Analysis form in the Subaward file, and save an electronic copy to the shared folder at S:/Risk Analysis/Completed Risk Forms.

4.6     Verify that the Subrecipient's most recent A-133 audit or financial documentation is on file with OSR. Review the audit or financial documentation using the guidelines at **Appendix C**. Affix, sign, and date an audit sticker on the cover of the Subaward file.

4.7     If necessary, check with the department and the PI to determine special needs or requirements for the subaward (i.e. reporting requirement, billing frequency, etc.).

4.8     Review the Prime Award to determine flowdown terms and conditions.
- If prior approval is needed to issue a Subaward, obtain approval from the Prime Sponsor's authorized official. (If the prime is an SOM grant, RMG will need to obtain prior approval.)
- Identify any mandatory flowdowns and special provisions (i.e., rebudgeting, certifications, carryforward of funds, change in personnel, etc.) for inclusion in the Subaward agreement.

4.9     If applicable, the Property Management Office (PMO) must approve all Subaward property language for the following before the agreement is sent to the Subrecipient:
- If the Prime Award is a grant with special conditions;
- If Subrecipient is a commercial or for-profit entity; and/or
- If Subrecipient is acquiring property.

Send all inquiries to Paul Dellwo or Max Canio. If property is included in the Subaward, ensure that the Equipment flag for that Subrecipient is modified to "Y" in SPIDERS. Place yellow "Equipment" sticker on front cover of Subaward file.

4.10    Draft the Subaward agreement
- Select and use the appropriate Subaward agreement template (S:/Templates) to create a draft Subaward agreement, based on the result of the Subrecipient Risk Analysis.
- Include:
    o Appropriate cautionary language inserts (from Section 4.5)
    o Special provisions (Section 4.7)
    o Flowdown provisions from the Prime Award (Section 4.8)
    o Equipment language (Section 4.9).
- Save the draft agreement to the appropriate project folder on the shared drive (M: Drive for SOM, J: Drive for H&S and EIL).

4.11    Send the Agreement to the Subrecipient
- Sign two original copies of the agreement as the Stanford Institutional Representative and send them to the Subrecipient for review and signature.
- Upon acceptance of terms, Subrecipient will sign and return one original executed copy of the agreement for activation.

In the event that negotiations are necessary or IRB/IACUC approval is still pending, the draft agreement may be sent to the Subrecipient **unsigned**.
- Send the unsigned draft agreement to the Subrecipient via email for review.
- Request any remaining supplemental documentation from Subrecipient.
- Negotiate the Subaward agreement terms with Subrecipient.
- Contact PI/department administrator to keep them apprised of agreement status. Obtain PI approval for any proposed changes if needed.
- Upon acceptance of terms, Subrecipient will print, sign, and return two original copies of the agreement for execution.
- Upon receipt, review and countersign the agreement as the Stanford Institutional Representative.

4.12    Complete the Subrecipient Database entry (See **Appendix E**).

4.13    Scan executed agreement as .pdf file and save to appropriate folder in the shared drive. Send scanned agreement to PI, department, Procurement, and RPM (SOM), ERA (EIL), and PMO if applicable. File original agreement on Flap 1 of Subaward project file.

4.14    Close out the pending action in the SPO Log.

**5.0    Subaward Amendments and Modifications**          [Assigned Officer]

5.1    Review amendment requisition received from Procurement. Amendments can be used to extend an existing Subaward for up to 12 months, but in no event beyond the Prime Award end date.

5.2    Confirm the following compliance requirements:

- Verify that the Subrecipient's most recent A-133 audit or financial documentation is on file with OSR. Review the audit or financial documentation using the guidelines at **Appendix C**.
- IRB/APLAC (if applicable) is renewed for approval into current performance period.

5.3     Create a draft Subaward amendment using the appropriate Subaward amendment template (S:/Templates).

5.4     Send the amendment to the Subrecipient
- Sign two original copies of the amendment and send them to the Subrecipient for review and signature.
- Upon acceptance of terms, Subrecipient will sign and return one original executed copy of the amendment for activation.

In the event that negotiations are necessary or IRB/IACUC approval is still pending, the draft amendment may be sent to the Subrecipient **unsigned**.
- Send the unsigned draft amendment to the Subrecipient via email for review.
- Request any remaining supplemental documentation from Subrecipient.
- Negotiate the Subaward amendment terms with Subrecipient, if needed.
- Contact PI/department administrator to keep them apprised of amendment status. Obtain PI approval for any proposed changes if needed.
- Upon acceptance of terms, Subrecipient will print, sign, and return two original copies of the amendment for execution.
- Upon receipt, review and countersign the amendment as the Stanford Institutional Representative.

5.5     Complete the Subrecipient Database entry (See **Appendix E**).

5.6     Scan executed amendment as .pdf file and save to appropriate folder in the shared drive. Send scanned amendment to PI, department, Procurement, and RPM (SOM), ERA (EIL), and PMO if applicable. File original amendment on Flap 1 of the Subaward project file.

5.7     Close out the pending action in the SPO Log.

# APPENDIX A

**To Access the SPO Log system:**

- ✓ Enter PRISM
- ✓ Type "Sel SPO Log"
- ✓ Select F6 (Create) to add a new transaction record
- ✓ Select F3 (Find) to find an existing record
- ✓ Select F5 (Modify) to modify an existing record

**To Access the Subrecipient Database:**

- ✓ Access the OSR Subrecipient Database via the S Drive (S:/Subaward.mdb)
- ✓ The Subrecipient Database opens in Data Entry Mode
- ✓ At red screen, select "Data Entry"
- ✓ Select "Find Record" to open a specific entry
- ✓ Select "Add Record" to create a new entry

**Excluded Parties Listing System (EPLS):**

EPLS is the electronic version of the Lists of Parties Excluded from Federal Procurement and Non-procurement Programs (Lists), which identifies those parties excluded throughout the U.S. Government (unless otherwise noted) from receiving Federal contracts or certain subcontracts and from certain types of Federal financial and non-financial assistance and benefits.

The system can be searched by the exact name or partial name of the institution or individual.

Accessing Excluded Parties Listing System (EPLS):

- ✓ Go to http://www.epls.gov/
- ✓ Select "Advanced Search"
- ✓ Enter exact or partial name of person, entity or country
- ✓ Click "Search"
- ✓ If party is debarred or excluded, escalate to Senior OSR Staff member.

# APPENDIX B

The Subrecipient Risk Analysis process is designed to assess the potential risk of entering into a Subaward agreement with a specific Subrecipient. The analysis considers criteria contributing to a Subrecipient's fiscal and organizational viability. These criteria are weighted, giving the more critical variables a higher weight.

Using the form on the S Drive (S:/Risk Analysis/Subrecipient Risk Analysis Template), assess the Subrecipient based on the criteria. Using the Risk Analysis Category Guidance tool (S:/Risk Analysis/Risk Analysis Category Guidance) as needed, analyze each risk category on a sliding scale. If there are concerns with the level of risk, the Risk Analysis score can be raised to the next level (low to medium, medium to high, etc.). Risk level can be raised once, but cannot be lowered. Consult the "High and Nuclear List" (S:/Risk Analysis/High and Nuclear Risk) to determine if the Subrecipient has previously been classified as higher-risk.

Risk level should be reviewed with each annual increment of funding, to determine whether risk level has changed since the previous award. If the risk level has increased, agreement language should be amended to address the areas of concern.

Low Risk (Score: 0-40)
If the Subrecipient falls into this category and the Subaward is under a Federal grant prime from NIH, NSF, NASA, or DOE, the appropriate FDP-style Subaward agreement template can be used. Include any non-standard flowdowns from the prime agreement if necessary (e.g., restricted funds, carryover language, etc.).

Medium Risk (Score: 41-75)
If the Subrecipient falls into this category, the standard Subaward agreement template can be used. Include mandatory flowdowns from the Prime Award as necessary.

High Risk (Score: 76-99)
If the Subrecipient falls into this category, it may be subject to the following actions:
- Cautionary agreement language inserts regarding yearly audit requirements, allowed and/or incurred costs
- Increased level of monitoring
- Requirement of Insurance Bond/Performance Bond
- Submission of copies of all receipts and invoices
- Specialized payment terms
- Notification of the PI and the RA/Department Administrator

Nuclear Risk (Score: 100)
If the Subrecipient falls into this category, it may be subject to the following actions:
- Review with PI to determine feasibility of entering into Subaward agreement
- Required site visit prior to issuance of Subaward agreement
- Increased level of monitoring
- Approval by OSR Director

Subrecipient's A-133 Audit or Financial Status **must be verified prior to signing** any Subaward Agreement or Subaward Amendment.

Review the Subrecipient Commitment Form (OSR Form #33) to determine if Subrecipient receives an A-133 audit. If Subrecipient does not receive an A-133 audit, then request an external audit, financial statements, or financial information from the Subrecipient, as described in the Audit Certification and Financial Status Questionnaire (OSR Form #47).

## I.　Obtaining Audit Documentation

Search the OSR Audit Database (S:/Subrecipients' A-133 and Financial Audit Info) for Subrecipient's A-133 Audit Report or OSR Form #47 information covering Subrecipient's most recent fiscal year.

Audit reports are typically completed nine months after the end of an institution's fiscal year. An audit report will contain an institution's current audit information for 21 months following the end of the fiscal year being audited (one year following completion of the audit report).

For example:

| Audit Year: | Audit Available: | Audit Current through: |
| --- | --- | --- |
| 12-month fiscal year | Nine months after end of FY | 21 months after end of FY |
| Ex: 7/1/03-6/30/04 | 4/1/2005 | 3/31/2006 |

If there is no current audit documentation on file for the Subrecipient in the OSR Audit Database, then:

(A) Search the Federal A-133 Audit Clearinghouse (Harvester), for Subrecipient's A-133 audit data collection form for the most recent fiscal year. Harvester can be accessed online at http://harvester.census.gov/sac. Review, scan, and save the report covering Subrecipient's most recent fiscal year into the OSR Audit Database, and notify the Subrecipient Monitoring Coordinator by email; OR

(B) Obtain a copy of Subrecipient's A-133 Audit Report for the most recent fiscal year. Review, scan, and save it into the OSR Audit Database, and notify the Subrecipient Monitoring Coordinator by email.

## II.　Reviewing A-133 Audit Documentation

Review Subrecipient's A-133 audit information for acceptability. Guidelines for the review include:

(A) If the Subrecipient's audit information indicates an unqualified opinion and no "findings" (reportable condition, material weakness, material noncompliance, questioned cost, or prior audit finding), approve Subrecipient's audit status by printing, signing, and dating the audit cover page. File the audit cover page on Flap 5 of the Subaward file.

(B) If the Subrecipient's audit information indicates a **non-material** finding relating either to the prime sponsor federal agency or to the "Research and Development" cluster of funding, consider whether cautionary language or other special requirements should be used for the Subrecipient. Examples of cautionary language are available on the S Drive. Contact the OSR Subrecipient Monitoring Coordinator or OSR Team Director for discussion and guidance.

(C) If a finding is classified as **material**, forward to the OSR Subrecipient Monitoring Coordinator or OSR Team Director for discussion and guidance. The information may be reviewed by the OSR Subaward Team. A management decision will be made prior to issuing the Agreement or Amendment. If appropriate, an action plan will be developed and implemented by OSR. A copy of the management decision should be filed in the Subaward file and in the OSR Audit Database.

## III.   Reviewing Alternate Audit Documentation

If the Subrecipient does not receive an A-133 audit and there is no OSR Form #47 covering the most recent fiscal year in the OSR Audit Database, request that the Subrecipient complete, sign, and return OSR Form #47 for the current fiscal year. Request submission of the Subrecipient's external audit, financial statements, or financial information.

Review completed OSR Form #47 and related audit or financial information. Scan and save it into the OSR Audit Database, and notify the Subrecipient Monitoring Coordinator by email. Contact the OSR Subrecipient Monitoring Coordinator or OSR Team Director for discussion and guidance regarding approval. Indicate approval by signing and dating the first page of the reviewed financial information, and filing it in the Subaward file.

After approval of the Subrecipient's A-133 audit or OSR Form #47, verify the following:

(A) The field titled "Most Recent A-133 or FQ on file" in the OSR Subrecipient Database record reflects the most recent fiscal year information on file.

(B) A copy of the Harvester Report, A-133 Audit Report, or the OSR Form #47 has been scanned and saved into the OSR Audit Database, and that the OSR Subrecipient Monitoring Coordinator has been notified by email of the added audit or financial information.

(C) The first page of the reviewed and approved audit or financial document has been signed, dated, and filed on Flap 5 of the Subaward file.

(D) The A-133/Audit Status Verified sticker for the most recent fiscal year has been appended to the cover of the Subaward file, signed, and dated.

The review process must be completed prior to execution of the Subaward Agreement or Amendment.  OSR Team Director approval is required prior to issuance of any Subaward Agreement or Amendment to a Subrecipient not in compliance with the requirements of OMB Circular A-133 or OSR Form #47.  File one copy of OSR Team Director's approval document in the Subaward file and provide a copy to the OSR Subrecipient Monitoring Coordinator.

## IV.     Conducting Annual Review of Subrecipient's A-133 or Financial Status

The OSR Subrecipient Monitoring Coordinator sends an annual request to Subrecipients for their most recent fiscal year's A-133 Audit Certification letter or updated OSR Form #47, if current audit or financial information is not already on file.

OSR follows up with Subrecipient if the requested A-133 Audit Certification letter or updated OSR Form #47 financial information has not been completed and returned in a timely manner.

If Subrecipient a) is non-compliant under A-133 by failing to complete its A-133 audit; b) continues to be non-responsive to certification or update requests; or c) does not comply with a Corrective Action Plan, the OSR Subrecipient Monitoring Coordinator should notify the OSR Team Director.

Non-compliance may result in the following actions:
1) Preparation of a termination notice due to non-compliance;
2) Allowing a reasonable time period under the circumstances to show compliance; and
3) Termination of the Subaward upon approval and agreement by the OSR Team Director after consultation with the PI.

# APPENDIX D
## Subaward Agreement/Amendment Action Checklist

❐ Log requisition into SPO log and Subrecipient Database
❐ Prepare Subaward file or retrieve existing file
❐ Check Requisition for complete information
❐ Verify Scope of Work
  o If not subaward scope of work, escalate or return to Procurement
  o If ok, enter "Confirmed Sub" in Subrecipient Database
❐ Verify that Subrecipient Institution and PI are not debarred (use EPLS).

**Create a new Subaward agreement/amendment**
❐ Get prime award file and current NOA (SOM Grant files in RMG)
❐ Review and reconcile with requisition:
  o Subrecipient's scope of work/deliverables
  o Subrecipient's budget/budget justification
❐ Obtain and/or review:
  o OSR Form 33
  o Sole Source Justification, if applicable (OSR Form 32)
  o Fair & Reasonable Cost Analysis (OSR Form 45 or OSR Form 46)
  o A-133 audit documentation or OSR Form 47 (Audit Certification & Financial Status Questionnaire ) [per Appendix C]
    ▪ Send original to Subrecipient Monitoring Coordinator and scan to S: Drive
    ▪ Copy, sign, and date cover page of audit; file on flap 5 of Subaward file
    ▪ Affix, sign, and date audit sticker on cover of Subaward file
  o Human Subjects/Animal Subjects approval, if applicable
  o Other forms required by Prime
❐ Perform or review Subrecipient Risk Analysis [per Appendix B]
❐ Obtain approval from PMO for property language, if applicable.
  o Modify SPIDERS to "Y" for equipment
  o Affix yellow equipment sticker on cover of Subaward file.
❐ Select appropriate Subaward template and draft the agreement/amendment
❐ Include (update in amendments if needed):
  o Appropriate cautionary language inserts [Section 4.5]
  o Special provisions [Section 4.7]
  o Flowdown provisions from the Prime Award [Section 4.8]
  o Equipment language [Section 4.9]
❐ Save to appropriate folder on shared drive (S: for EIL and H&S, M: for SOM)
❐ Sign two copies of agreement/amendment and send to Subrecipient for signature
❐ Complete Subrecipient Database entry [Appendix E]
❐ Scan fully executed agreement/amendment as .pdf and save to shared drive; file original agreement/amendment on flap 1
❐ Close out pending action in SPO Log.

*This checklist is for internal OSR use only as a non-auditable tracking tool. (effective 5/1/06)*

Sample Subrecipient Database Entry

**Toolbar buttons:** List of Files | Cover Sheet | Add Record | Find Record | Print Record | Save Record | Close Form

**Requisition No.:** 13290660

**Contract Officer:** DPL | DERRICK LIN

**Date Sent to Sub for Signature:**

**OSR TEAM** SOM | **Contract Type:** New Contract

**Most Recent A-133 or Form 47 on File:** 2004

SU SPO # 30011 | **Associate Name:** CATHI BLACKWOOD | SU Alpa#:B

**Date Sub Fully Executed:** 10/18/2005 | **Date sent to Procurement:** 10/18/2005

> Capital Equipment | **Type of Financial Report**

**Date Req Rec'd by OSR:** 11/2/2004 | **Amendment**

**Executed Copy Sent to Dept:** 10/18/2005

**Confirmed Sub** ☑ SSA - GCEP | **Req Terminated**

**Contract Information - STANFORD UNIVERSITY**

**PI Name** Hanner, Gregory
(Last Name, First Name)

**Contract/Grant** Contract | **SU Sponsor:** NIH

**Subaward No.** 13290660-30011-B | **Contract/GrantNo** HHSN27520040336C | **Begin Date** 9/30/2004 | **End Date** 9/29/2005

**Dollar Amount** $270,137.00 | **Cumulative Total To Date:**

(If amendment - use begin and end date of the amendment period)

**Department Administrative Contact Information**

**Admin Contact Name** Dorren Lunsford | **Dept.** Anesthesia | **Phone** 724-9341 | **Email** dloey2001@stanford.edu

**Subrecipient Information**

**Subrecipient Legal Name:** Children's Hospital of Los Angeles | **Sub Recipient Fed Tax ID** 195612196A1

**Address** Anesthesiology, CHLA, #3

**City** Los Angeles | **State/Country** CA | **Zip** 90027

**FirstName** Esther | **LastName** Nakamura-Reyes | **Position** Manager, G&C

**Phone No** 323-644-8613 | **Fax No** | **Email** enakamurareyes@chla.usc.edu

**Comments**