

The highest standards of ethical conduct and careful stewardship of funds and resources are required of University employees in performance of their University responsibilities. Employees will not engage in activities, or reputation or otherwise cause embarrassment to the University. Any external activities related to University business must follow University policy.

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Applicability

The GRASP Compliance Program applies to all research and sponsored program activities conducted at the University by faculty, staff, students and other affiliated agents.

The GRASP Compliance Program applies to the following:

Sponsored program activities, regardless of funding source (federal, state, private, nonprofit, etc.) or type of legal agreement (grant, contract, cooperative agreement, teaming agreement,

mission of instruction, research and public service.

Protection of human subjects in research

Welfare of animals in research

Integrity in research

Publication of research findings

Laboratory safety

Export controls of information and technology

Data acquisition and management

Student financial aid eligibility, payments and reporting

Allowability and consistency of cost accounting practices

Management of cash and accounts receivable

Safeguarding of University property

Applicable government regulations and grant/contract provisions

Management and development of intellectual property

External and internal reporting

Retention and availability of records

The Program will be responsive to changes in laws, grant/contract provisions, and University policies.

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Components

The following components of the GRASP Compliance Program are addressed in the GRASP Compliance Plan:

Roles and Responsibilities

Standards and Procedures

Assessment and Monitoring

Education and Training

Reporting and Correcting Noncompliance

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Ensure that policies and procedures related to research compliance are established, implemented, distributed, reviewed, and dated.
Review and ensure disposition of matters of alleged noncompliance in consultation with the Director of Research, the Faculty Research Committee and the General Counsel.

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Office of Research and Sponsored Programs (ORSP) will

Implement and interpret sponsor and University policies and procedures for compliance with applicable regulations.
Train research personnel in preparation of grant/contract application and managing sponsored research.
Propose policies and procedures to senior administration in compliance with grants and contracts management regulations.
Coordinate with other University research and sponsored programs oversight committees, boards, and offices to ensure that specific proposals and projects have been reviewed and approved for compliance.
Advise Institutional Review Board for the Protection of Human Subjects (IRB), Institutional Animal Care and Use Committee (IACUC), Institutional Biosafety Committee (IBC), and Faculty Research Committee on compliance issues.
Provide administrative support to IRB, IACUC, IBC, and Faculty Research Committee.
Conduct pre-submission compliance review of proposals for external funding, except those submitted by the Director of Corporate and Foundation Relations.

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The Grant Accountant will

Make Project Directors/Investigators, and others involved in a project, aware of financial commitment and reporting requirements.

Complete OMB A-133 audit required schedules in a complete and timely manner.
Notify the Office of Internal Audit regarding any unusual circumstances/events.

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Office of Internal Audit will

Assist the University's external auditing firm in conducting the University's annual OMB Circular A-133 audit.
Perform periodic internal audits of selected University federal research grants as provided for in the internal audit plan. The scope of these audits will include procedures to test the University's compliance with OMB Circulars A-21 (cost principals) and A-110 (administrative practices).
Monitor grant effort reporting by periodically reviewing a selection of federally funded labor, fringe and overhead costs.
Issue a report of audit findings and any corrective actions needed.

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Institutional Review Board for the Protection of Human Subjects (IRB) will

Review for approval research protocols in which human subjects are involved.
Monitor ongoing progress of approved protocols.
Provide for education and training in human subjects research.

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Institutional Animal Care and Use Committee (IACUC) will

Review for approval research protocols in which animal subjects are involved.
Monitor ongoing progress of approved protocols.
Provide for education and training in animal subjects research.

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Institutional Biosafety Committee (IBC) will

Review and approve use of recombinant DNA in research activities.
Review for approval all research protocols in which use of recombinant DNA is involved.
Monitor ongoing progress of approved protocols.
Provide for education and training in biosafety.

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Radiation Safety Committee will

Review and approve procurement and use of radioactive materials.
Provide administrative support to faculty using radioactive materials for research and education.
Review for approval all research protocols in which use of radioactive materials is involved.
Provide for the education and training in the use of radioactive materials.

Director of Corporate and Foundation Relations will

Assure compliance of all proposals submitted by Corporate and Foundation Relations.
Coordinate with University GRASP oversight committees, boards, and offices as appropriate.

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REPORTING AND CORRECTING NONCOMPLIANCE

Reporting Noncompliance

University personnel are expected to report any known or suspected noncompliant conduct related to grants, research, or sponsored programs. No person will be retaliated against by the University or any of its employees or agents for making a good faith report of suspected noncompliant conduct in research, grants, or other sponsored program activities.

Appendix I - Resource List

<u>Policy</u>	<u>Responsible Office/Committee</u>	<u>Contact Office(s)</u>
Alcohol and Illicit Drugs	Human Resources Vice President for Student Affairs	Human Resources Student Affairs
Animal Welfare	Institutional Animal Care and Use Committee (IACUC)	ORSP
Chemical Hygiene	Environmental Health	Public Safety
Computing	Associate Provost for Information Resources	Technology Support
Conflict of Interest	ORSP	ORSP
Copyright	General Counsel	ORSP
Equal Opportunity	Equity and Diversity Office	Human Resources
Grants Administration	Grant Accountant	ORSP Grant Accountant
Honesty, Academic Code of	Provost	General Counsel
Human Subjects in Research	Institutional Review Board for the Protection of Human Subjects (IRB)	ORSP
Infectious Waste	Environmental Health	Public Safety
Patent	General Counsel	ORSP
Radiation Safety	Radiation Safety Committee	Public Safety
Recombinant DNA	Institutional Biosafety Committee (IBC)	ORSP
Research Misconduct	Faculty Research Committee	Office of Research and Sponsored Programs (ORSP)
Sexual Harassment	Equity and Diversity Office	Equity and Diversity Human Resources
Violence in the Workplace	Human Resources and Public Safety	Human Resources Public Safety
Workplace Safety	Public Safety	Public Safety

