

Compliance: Responsibility in Sponsored Programs Administration

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Objective

Understand that the Institution's commitment when submitting a grant application is to comply with all applicable policies, assurances and certifications.



“NIH sees the Research Administrator as partners because you are the people that look out for the policies and procedures.”

Dr. Hinda Zlotnik (March 15, 2010)
NIH-NIGMS



Mission

- ❑ Promote and facilitate compliance to maintain eligibility of our institutions and reduce risk of audit findings.
- ❑ Facilitate research, instruction, public service goals of our Institutions.
- ❑ Support our researchers by providing timely and accurate information, efficient procedures and direct technical assistance.



Human Resources



Physical Resources



Financial Management



Compliance



Compliance = Responsible Conduct of Research

- ❑ SPO will verify if the grant application requires approval from a Review Board.
- ❑ SPO provides orientation to the PI on the requirements to submit the grant application and completed protocol forms to the corresponding Review Board(s).

Compliance

- ❑ PI completes the required forms and submits to the Review Board(s) in accordance to established institutional procedures.
- ❑ Review Board(s) review the proposed research design in the grant application and the protocol in compliance to federal regulations; approves, disapproves or requests modifications .

Compliance

- PI submits Review Board approvals to the potential sponsor (JIT); SPO submits substantial changes made in protocols .
- Review Board stops a research project; SPO inactivates grant activities.
- Review Board investigates:
 - retrieves approval of a research protocol indefinitely
 - authorizes the continuation of the research

Compliance

How many of you have read your institution's policies and procedures regarding Responsible Conduct of Research?



Compliance

- Human Subjects Research
- Animal Care and Use
- Debarment and Suspensions
- Fraud and Misconduct
- Drug Free Work Place
- Civil Rights
- Financial Conflicts of Interest
- Lobbying
- Smoke Free Work Place
- Sexual Harassment
- Data Ownership
- Biohazards (Biocontainment)
- Among manyyyyyyyyyyyyyyy others



Human Resources



Physical Resources



Financial Management



Compliance



Physical Resources

- ❑ Major Equipment - Space and environmental requirements
- ❑ Office Space for administrative core
- ❑ Laboratory Space – Academic or research; security and environmental controls



Human Resources



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Financial Management



Compliance



Financial Management

- Cost Share
- In-kind
- Sustainability – When and How
- Salary increases, fringe benefits
- Purchasing and contracts
- Monitoring Plan for Subcontracts
- Training Plan for Project Directors on Policies and Procedures



You are Funded!

- Terms and Conditions – Notice of Grant Award or signed agreement/contract
- Budget Adjustments, if required
- Initiate Sustainability Plan with the Budget Office and Project Director or PI
- Implement a Monitoring Plan for Sponsored Projects for the programmatic and fiscal compliance



Human Resources



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Compliance



Human Resources Office

- Recruitment – equal opportunity – federal and state laws – institutional policies
- Salaries & Wages – double standards?
- Time & Effort
- E-Verify an internet based system for employee eligibility verification



Consequences of Misconduct

- Financial
- Political
- Public Image
- Career
 - Debarment and suspension
 - Fines and incarceration



QUESTIONS!

