Contacts for Research Compliance

Purpose of the document:
Many of the various components of research compliance are difficult to track and it is often unclear which offices have which responsibilities. Additionally, all this information is not located in one place.

The below guide is meant to be a quick reference to help identify the appropriate research compliance contact(s), including links to websites and resources.

Update process: The document will be updated once a year. Information is pulled from existing office web pages and verified by the responsible office.

Summary Statement: Award Compliance, Fiscal Compliance:

PI's, departmental research administration support staff, OCG, and RFS work as partners to assure fiscal stewardship and compliance in research administration.

a. *PI's and Departments are responsible for understanding the terms and conditions of awards, and for initiating expenditures that meet allowability standards for the award (reasonableness, allocability, allowability), following award conditions, and federal, state and CU policies and procedures.*

b. *OCG handles questions related to <u>award compliance</u> - general regulatory requirements, the award conditions, sponsor restrictions, and scope of work/changes.*

c. *CCO has oversight for <u>fiscal compliance</u> - the final authority to determine whether expenditures are allowable or not. They can*

1. *Approve*

2. *Disapprove*

3. *Suggest to departments that additional documentation is required to allow the expenditure within the scope of work.*

Other Research Compliance – Human Subjects, Animal Research, Export Control, Conflict of Interest, Controlled Substances, Biohazards, etc.

Office and Description of Compliance Activity	Website(s)
The Office of Contracts and Grants (OCG): works in partnership with CU Boulder's faculty and staff to prepare and submit proposals, including budgets for external sponsored projects and service agreements. OCG has the authorization to negotiate and accept sponsored research and service agreements, non-disclosure and material and data transfer agreements on behalf of the Regents, monitor and provide guidance throughout the life of an award and ensure final project closeout.	Website http://www.colorado.edu/ocg/ Structure of OCG https://www.colorado.edu/ocg/about-us/ocg-organizational-structure OCG Directory http://www.colorado.edu/ocg/directory
Submission of complete proposal packages. This includes assisting with preparation of the budget and other components.	Proposal Development Team http://www.colorado.edu/ocg/prepare-submit-proposals
Award review, negotiation, acceptance, and issuing outgoing subawards/subcontracts. OCG's Compliance Team manages sponsor titled property, technical and invention reporting, and non-fiscal award closeout, and advises travelers regarding international travel regulations. *Property and Equipment, International Travel:* Administrative close-out of all sponsored projects, including subaward closeout, final property reports, invention/new technology reports, award Release and Assignment	Grants and Contracts Teams https://www.colorado.edu/ocg/manage-awards/incoming-award-review-acceptance OCG Compliance Team https://www.colorado.edu/ocg/award-compliance http://www.colorado.edu/ocg/manage-awards/property- and-equipment http://www.colorado.edu/ocg/manage-awards/travel http://www.colorado.edu/ocg/award-closeout

Research Financial Services (RFS) – Campus Controller's Office RFS duties include management of Funds 30 through 33, plus: • Review and approve journal entries on sponsored projects • Ensure that cost and budget transfers are in compliance with Policies and Procedures • Review and approve payroll expense transfers (PETs) • Maintain and ensure compliance with electronic Personnel Effort Reports (ePERS) • Review and approve non-equipment purchase order (PO) requisitions in CU Marketplace for sponsored projects • Monitor accounts for Participant Support expenditures • Monitor accounts for all Cost Sharing/matching dollars • Provide Cost Share reports to Billing and Sponsoring government and private entities; and • Manage and ensure that invoicing requirements are met. <u>Revenue Management:</u> provides accounts receivable payment processing and collections support for sponsored projects	Website Resources for Research Awards https://www.colorado.edu/controller/sponsored-projects/policies-procedures-guidance-related-sponsored-research Cost Transfers https://www.colorado.edu/controller/policies/cost-transfer-policy-guidance
	ePERs and PETs https://www.colorado.edu/controller/sponsored-projects/sponsored-projects-compliance/epers-pets ePERS@colorado.edu Cost Share https://www.colorado.edu/controller/resources/cost-share

Grant Accountants: in RFS are responsible for the following: • Cash Management - monitor LOC accounts to determine drawdowns of federal funds • Financial Oversight and Assistance • Financial Reporting and Invoicing preparation and submission • Financial Closeouts (in conjunction with the Closeout Team) Closeout Accountants: After a research project account ends, the closeout team completes the Financial Closeout Process during which it performs a comprehensive closeout analysis. The process includes a review of all the account activity over the lifetime of the award and confirmation that CUBoulder accurately reports the use of sponsored funds, properly recorded activities in the university's financial system, and has maintained compliance with the sponsor's terms and conditions throughout the project. The closeout process includes: • Review account activity and make sure all expenses are allowable under each agreement's terms and conditions • Closeout of financial awards, speedtypes, and projects for sponsored award activities •	Find Your Grant Accountant https://www.colorado.edu/controller/2023/11/01/locating-your-grant-accountant https://www.colorado.edu/controller/policies/sponsored-research-closeout-procedures

Research Grant Effort Reporting (ePERs) – Research Financial Services Effort reporting is a requirement for recipients of federal awards as a means of attesting to the appropriateness of salaries and wages charged to the contract or grant. Sponsoring agencies require reasonable assurance that labor costs charged to a sponsored project reflects the actual effort expended on the project.	https://www.colorado.edu/controller/policies/epers-policy-procedure ePERS@colorado.edu
Office of the Campus Controller (CCO) Fiscal compliance for all fund types for the Boulder Campus. The office mission is to develop, implement, and maintain an annual internal review plan that will identify areas of financial and operational risk. CCO's primary concern is with campus-wide internal controls that support reasonable levels of compliance. Includes alcohol purchases, other sensitive expenditures, and after the fact requisitions.	fiscalcompliance@colorado.edu

Human Subjects (IRB) The Institutional Review Board (IRB) at CU Boulder is responsible for the review of all human subject research when conducted by the university's faculty, staff, students or other affiliates and agents. The primary goal is to ensure human subjects are: 1. Treated with dignity 2. Adequately protected from risk of harm 3. Provided informed consent so they may voluntarily and knowledgeably participate in research	https://www.colorado.edu/researchinnovation/irb

Animal Subjects (IACUC) The **Animal Care & Use Program** at the University of Colorado Boulder is comprised of the **Office of Animal Resources (OAR)**, the **Institutional Animal Care and Use Committee (IACUC)**, **Occupational Health & Safety** and all active researchers in labs or in the field. All research, teaching and testing projects conducted by faculty, staff or students involving vertebrate animal subjects at CU Boulder must be reviewed and approved by the IACUC prior to engaging in the research or other endeavors.	http://www.colorado.edu/researchinnovation/iacuc

Export Controls Working with foreign national collaborators, institutions, or students may fall under the purview of various federal export control laws. In general, these regulations involve military technology (including nearly all space-based research), "dual-use" technologies (including a wide range of equipment from distillers to lasers), as well as nearly any kind of financial transactions with certain embargoed countries or individuals. "Exports" are not limited to the physical export of equipment or software; "deemed exports" include dissemination of technical information to foreign persons, whether it occurs within or outside the US. This may occur in presentations, emails, personal conversations, site tours, or in training of foreign national researchers.	https://www.colorado.edu/researchinnovation/export-controls

Basic and applied research may qualify for one or more of the exemptions or exclusions provided in the regulations. In some cases, it may be necessary to apply for an export license, which can take considerable time to develop. PIs should contact the Office of Contracts and Grants as early as possible if you think these may be required.	https://www.colorado.edu/ocg/

Conflict of Interest The University of Colorado Boulder encourages scholarship, research, and creative pursuits that lead to commercial and consulting activities. Such activities, however, have the potential to lead to conflicts of interest. Conflicts of interest reporting is required annually of: • All faculty job types (including all levels of researchers) • Museum Associates and Librarians • Fellows • Graduate students • Any student involved with a CU-employee-affiliated company/entity. Additional reporting and approval processes are necessary for employees who: • Have external consulting types of arrangements • Are involved in purchasing between the University and an employee-affiliated or family related entity • Use self-authored instructional materials that are required in classes offered by CU.	http://www.colorado.edu/researchinnovation/coi

Controlled Substances It may be necessary to use controlled substances, as well as industrial hemp, in research and teaching activities on the CU Boulder campus. Controlled substances are identified in the schedules contained within the "Controlled Substances Inventory List," published by the [U.S. Drug Enforcement Administration (DEA)](#). University employees who are conducting research or teaching activities that involve controlled substances or industrial hemp must: • comply with applicable federal and state laws and regulations regarding their use; • possess any necessary US DEA and State of CO registrations; • adhere to controlled substance *storage, inventory maintenance, and disposal* requirements; • comply with reporting and record keeping requirements.	https://www.colorado.edu/researchinnovation/controlled-substances
Responsible Conduct of Research (RCR) Training in RCR is required for all post-docs, and students involved in NSF- or NIH- sponsored research • Any student or postdoctoral fellow who is paid from a **National Science Foundation (NSF)** grant award. [See NSF requirements](#) • Trainees supported by specific awards (institutional	https://www.colorado.edu/urop/grants/student-grants/student-grants-guide#compliance-1121

training grants, educational grants, and research career development awards) from the **National Institutes of Health (NIH)**. <u>See NIH requirements</u>	
Sponsored Research with Publication Restrictions On the CU-Boulder campus, petitions to accept research sponsorship that imposes restrictions on publication must be reviewed by the Standing Committee for Restricted, Proprietary, and Classified Research, which will then make recommendations to the Chancellor, or the Chancellor's designee. Work closely with the Office of Contracts and Grants (OCG) on your proposal and awards. OCG personnel will try to negotiate with the sponsor to remove publication restrictions. If that negotiation is not successful, and you still wish to seek funding from the sponsor, you must formally request a waiver of the policy on Restricted, Proprietary, and Classified Research.	https://www.colorado.edu/researchinnovation/restricted-proprietary-and-classified-research
Research involving rDNA, bloodborne pathogens, or toxins The Institutional Biosafety Committee (IBC) is responsible for reviewing all University research and teaching activities involving the use of biohazards, recombinant DNA molecules, select agents, or bloodborne pathogens whether the activities are carried out on campus or off campus (usually under other Institutional Biosafety Committees). **Most biological research requires IBC authorization prior to initiation. This authorization must be renewed every 3 years.**	https://www.colorado.edu/ehs/lab-research/biological-materials/institutional-biosafety-committee-ibc

Research involving Hazardous Waste Use of chemicals and hazardous materials in research at CU Boulder is overseen by the Hazardous Materials and Waste Management Unit and the Environmental Compliance and Industrial Hygiene Unit. Training is required annually.	https://www.colorado.edu/ehs/lab-research/chemicals-hazardous-materials https://www.colorado.edu/ehs/training
Research involving Radioactive Sources The Radiation Safety Unit supports all safety in research involving radioactive materials and radiation-generating machines on the CU Boulder and Colorado Springs campuses. We provide resources, training, and various required safety programs to help you conduct your research and minimize any danger or health hazards in the process. The University of Colorado has been granted a license for the use of radioactive materials and radiation-generating machines in research. This license has been granted by the Colorado Department of Public Health & Environment (CDPHE) under an agreement with the Nuclear Regulatory Commission, and it calls for compliance with applicable federal and state laws. We work to maintain the health and safety of all radiation-workers at CU Boulder. Training is required; refresher training is required every 3 years.	https://www.colorado.edu/ehs/lab-research/radiation-safety
Sponsored Projects with Controlled Unclassified Information (CUI) Effective December 31, 2017, grants and contracts which are deemed by the	Questions can be sent to itso-sec-review@colorado.edu

| federal government to involve *controlled unclassified information (CUI)* will require compliance with additional security standards (NIST 800- 171). The following are examples of CUI that CU might receive from or produce for a Federal Agency:

• export controlled research data,
• critical infrastructure information,
• controlled technical information,
• personally identifiable information (PII) such as government issued identification, genetic or health data,
• information pertaining to law enforcement operations, investigations, prosecutions, or enforcement actions,
• student financial records.

Contracts and Grants which are deemed to involve CUI will have language (as part of the Federal Acquisition Regulation (FAR) or Defense Federal Acquisition Regulation Supplement (DFARs) clause) requiring that we comply with FAR 52.204-21 or NIST SP 800-171

NIST 800-171 involves 110 specific IT system and security controls within 14 broad categories. | http://www.colorado.edu/ocg/manage-awards
https://www.colorado.edu/ocg/controlled-unclassified-information-cui

OCG has been working OIT to comply with NIST requirements for CUI related awards. OIT has engaged PIs and departments on a case-by-case basis to close any system and security control gaps. Sponsors will need confirmation of compliance prior to award. |

Research Security

The Research & Innovation Office (RIO) is responsible for leading security and compliance efforts to ensure the campus's adherence to security requirements, as well as supporting faculty and staff in their related responsibilities.

The NSPM-33 Implementation Guidance, released in January 2022, requires any institution receiving over $50 million in federal research funding to establish a **Research Security Program** touching on four main areas of focus:
- Research Security Training
- Cybersecurity
- Foreign Travel Security
- Export Control Training

https://www.colorado.edu/researchinnovation/research-administration/compliance/research-security