Office of Sponsored Programs
Compliance Overview

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Office of Sponsored Programs

OSP Role

OSP, as a unit within Research Administration, is Emory's central university-wide office which provides support and oversight for pre-award (and non-financial post-award) activities for all sponsored projects for Emory and its research community.

OSP Role

OSP serves as Emory's authorized representative (business office and official signatory) for non-financial matters related to sponsored research funding.

OSP Core Responsibilities

- Reviews and signs/submits grant proposals,
- Reviews/negotiates/accepts grant awards,
- Reviews/negotiates/executes contracts (federal, state, industry, incoming subawards),
- Prepares/negotiates/executes outgoing subawards,
- Many other pre-award and non-financial post-award activities.

OSP Structure and Workload Management

- OSP comprises three main functional units: Grants Team, Contracts Team (industry and non-industry sub teams), and Subcontracts Team (outgoing subcontracts)

- Day-to-day responsibilities are handled by Analysts on each of OSP's teams, with oversight and input by Assistant Directors, Associate Directors and Directors. OSP's organizational chart and a detailed description of the responsibilities of each team can be found at: https://www.osp.emory.edu/about/contact-us.html and https://www.osp.emory.edu/about/index.html.

Systems to be Aware of

- Compass
  - EPEX*
  - Compass Grant Forms*
  - Subaward Request Pages*
- CAYUSE
- Emory Business Intelligence (EBI)
- Grant Tracking System (eGTS)*
- Contract Tracking System (eCTS)*

*Can help answer "Where is it?" questions.

OSP and Compliance

OSP collaborates closely with all compliance offices across the university to help ensure that necessary compliance reviews and approvals are in place for all sponsored research

OSP and IRB

- IRB approval needed for NOA unless Delayed Onset study
- IRB approval is grant-/contract-specific
- For industry contracts, IRB approval needed before contract execution
- Sponsor Notification of IRB Suspension (and occasionally UP or SN)
- Issuance of revised NOA prohibiting work

OSP and IRB

- Emory IRB is AAHRPP accredited
- Accreditation standards require certain standards with respect to safety reporting to be met in all contracts for clinical work
- OSP collaborates with IRB to ensure such accreditation standards are met

OSP and IRB

- Federal regulations related to protection of human subjects apply to all federally-funded human subjects research
- OSP ensures that all collaborating partners comply with such requirements
  - Foreign and domestic subawardees
  - FWA requirements

OSP and IACUC

- IACUC approval needed for NOA
- IACUC approval is grant-/contract-specific (can be via modification to existing protocol)
- Sponsor notification of IACUC Suspension
- Internal notification (via eNOA) of suspension to restrict activities and expenditures
- Review of costs during suspension to prevent unallowable costs

OSP and IACUC

- Federal regulations related to protection of animal subjects apply to all federally-funded animal subjects research

- OSP ensures that all collaborating partners comply with such requirements
  - Foreign and domestic subawardees
  - AWA requirements

OSP and COIC

- OSP reviews to ensure appropriate financial interest disclosures are on file at various points in the sponsored programs lifecycle
  - Proposal submission
  - Award Setup
  - Annual Reporting
- OSP works with the COIC Office in instances where disclosures are out of date

OSP and COIC

- OSP notifies COIC Office at JIT stage or as new awards are received so that necessary reviews are undertaken

- Reduces burden in that only disclosures associated with proposals like to be awarded (or are actually awarded) are reviewed for FCOI

- In some circumstances, can impact timeline for award setup

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OSP and COIC

- PHS FCOI policy includes requirements for subrecipients on its awards
- Subrecipients must maintain an enforceable policy or be subject to Prime Awardee's (Emory's) policy
- OSP Subaward Team ensures these requirements are met and clearly delineated

OSP and Export Controls

- Restricted Party Screening (via VisualCompliance and SAM.gov)
- Via Contract Negotiation process (publication restrictions and/or restrictions on the participation of foreign nationals)
  - Technology Control Plan
- Collaborate on international projects as needs arise

OSP and EHSO

- EHSO – radiation safety and biohazards; international IBC
- More limited collaboration, but available as needs arise

Sponsor-driven Compliance Areas

- RCR Training – varies by sponsor and type of award
- Harassment reporting – varies by sponsor
- Scientific Misconduct
- Sponsor disclosure requirements (NSPM-33)

OSP collaborates with appropriate compliance offices on these areas.

OSP: Nuts & Bolts
Proposal Development

The proposal should be developed in accordance with the agency's guidelines with careful attention being paid to the PI's ability to lead the project, the resources available to do the work, and the ability to comply with University and sponsor requirements throughout the life of the project.

Common Proposal Problems

- ✓ Last-minute proposals

- ✓ Lack of editing/proofreading by preparer

- ✓ Inattention to University and sponsor budget guidelines, requirements, and instructions

- ✓ Insufficient information provided to School/OSP, e.g., a copy of the program announcement or other instructions

PI Responsibilities

- Reviewing the terms and conditions for each grant and contract they are awarded.

- Keep their current and pending support records up-to-date at all times, including ALL sources of support, and to be able to clearly articulate and differentiate the scientific aim(s) of each funding source.

- Identifying and notifying appropriate individuals in cases of scientific or budgetary overlap.

- Scientific/programmatic management of a project, including technical reporting.

- Good financial stewardship - reviewing expenditures to ensure that all charges and credits are appropriate.

PI Responsibilities

- **Regulatory Compliance**: Adhering to all University and sponsor requirements for:

  - Human subjects,
  - Lab animals,
  - Biohazards, safety and security,
  - Conflict of Interest disclosure of outside responsibility
  - Effort Reporting and
  - Subrecipient monitoring

Remember that…

- All transactions must be consistent with the terms of the contract or grant.

- Expenditures must not exceed the available balance or be incurred after the end date on a project.

- PIs need to be aware of cost-sharing obligations, including faculty contributed effort.

Key Resources

- [Newcomer's Guide](#)
- [OSP Contacts](#)
- [Sponsored Programs Manual](#)
- [Education](#)
- [Newsletters](#)

Questions ?