

RESOURCES:

Office of Sponsored Programs
210.567.2340
grants@uthscsa.edu
<http://www.uthscsa.edu/ogm>

Institutional Review Board
210.567.2351
<http://www.uthscsa.edu/irb/>

Institutional Animal Care & Use Committee
210.567.3718
<http://www.uthscsa.edu/lap.index.asp>

Laboratory Animal Resources
210.567.6166
<http://www.uthscsa.edu/lap.index.asp>

Environmental Health & Safety
210.567.2955
<http://www.uthscsa.edu/safety/>

**Office of Technology Ventures
(Patents & Licensing)**
210.567.0150
<http://www.uthscsa.edu/otv/>

Office of Human Resources
210.567.2600
<http://www.uthscsa.edu/hr/>

Purchasing
210.567.6030
<http://www.uthscsa.edu/business/purchasing/>

Vice President for Research
210.567.0397
<http://www.uthscsa.edu/research/index.asp>

Institutional Compliance & Consultation Office
210.567.2014
<http://www.uthscsa.edu/compliance/>



The University of
Texas Health
Science Center at
San Antonio

PRINCIPAL INVESTIGATOR/ PROJECT DIRECTOR QUICK REFERENCE COMPLIANCE GUIDE

COMPLIANCELINE 1.800.500.0333

(24 HR HOTLINE TO REPORT ALLEGATIONS OF ETHICAL VIOLATIONS, FRAUD, THEFT, WASTE, AND NONCOMPLIANCE AT THE HEALTH SCIENCE CENTER)

The PI is the individual responsible for all aspects of an award—both in conducting the project consistent with highest academic standards and appropriate stewardship of the funding provided.

RESPONSIBLE CONDUCT OF RESEARCH

Integrity is essential in the conduct of research. As an institution, the Health Science Center is charged with assuring our external sponsor that the work conducted here meets the highest scientific and ethical standards. In turn, Health Science Center investigators must pursue their research with an appropriate standard of conduct and the utmost in intellectual honesty. By doing so, both the Health Science Center and its investigators protect the public's interest in the results of our research and preserve the ability to continue to conduct research that meets societal needs.

This Guide was written to assist the faculty investigator in understanding and carrying out their role in the conduct and administration of sponsored programs.

Additional information and resource materials regarding the Responsible Conduct of Research can be accessed at:

<http://www.uthscsa.edu/research/conduct.asp>.

Health Science Center policies and procedures can be found at:

<http://www.uthscsa.edu/compliance/policies.html>

AWARD MANAGEMENT 101

The following information should be kept at hand for reference by both the PI/PD and their administrator:

1. Agency award letter or agreement: Some things to look for—What project changes are allowable without further approval? Are there deliverables other than reports? When are progress/final technical reports due?
2. Project/Grant Activation Notice (PGA): internal document which gives important information such as start and end date, award amount, project/grant id, summary of special terms and conditions, etc.

On a monthly basis, the PI should review and verify the expenditures made against the project's project/grant id (e.g., account).

For federal awards, agency approval is always needed for: change in key personnel, absence of the PI for more than 3 months, significant changes in effort. Such requests should be countersigned by the Office of Sponsored Programs.

DIRECT COSTS

- Must be specifically identified with a particular project—charge it where you use it!
- Must be allocable (i.e., costs must be charged in proportion to their benefit to a particular project).
- Must be reasonable (i.e., charging costs to a particular project must be done conservatively and reflect the actions of a prudent person).
- Must be allowable (i.e., certain costs, such as entertainment, may not be charged to a Federal grant under any circumstances).
- Administrative and clerical costs, office supplies, memberships, postage, and subscriptions should not *normally* be charged to federal awards.
- Must be timely (any cost transfers should occur as soon as error is discovered and in all cases should be corrected within 60 days of incurrence of costs).
- Must conform to any limitations of exclusions in the Sponsored Agreement

COST TRANSFERS

- Must conform to the principles of direct costs.
- Funds from one project are not interchangeable with another project's funds.
- Transfers are a means of correcting errors NOT managing project funds.
- Must be supported with a full, detailed explanation—not just what was done but why the transfer was necessary.
- Costs allocable to several projects CANNOT generally be charged solely to a single project.
- Costs not allocable to a project CANNOT be transferred to that project, even temporarily.

For details of the Cost Transfer Policy, see:

[HTTP://WWW.UTHSCSA.EDU/OGM/FORMS/COST_TRANSFERS_TO_FEDERAL_AWARDS_POLICY.DOC](http://www.uthscsa.edu/OGM/FORMS/COST_TRANSFERS_TO_FEDERAL_AWARDS_POLICY.DOC)

MISCONDUCT IN SCIENCE

Misconduct in science or research misconduct means the deliberate fabrication, falsification, plagiarism, or other practices that seriously deviate from those that are commonly accepted within the scientific community for proposing, conducting, or reporting research. It does not include honest errors or honest differences in interpretations or judgments of data.

The Health Science Center's policy statement on misconduct can be found at:

<http://www.uthscsa.edu/hop2000/7.6.1.pdf>

EFFORT CERTIFICATION

Individuals are required to complete effort certifications if they have committed and/or paid effort on any federally-sponsored project or any project classified as research and residing in the 40000 series (formerly -K-) of the HSC financial system.

- For most faculty with committed and/or paid effort, effort certification is done on a semi-annual basis. For all others, effort certification is performed monthly.
- Certification must be completed by the individual whose effort is being reported. Only as a last resort should the certification be completed by a responsible person with access to verifiable information on how the individual's effort is being expended.
- Certification must be of how time was actually spent, NOT how payroll was distributed.
- Sponsor approval may be required for significant changes in effort of key project personnel.
- Effort reports should capture all HSC-compensated activities. Excluded from certification is any compensation received from sources other than the HSC, such as compensation from the VA or outside consulting activities permitted by the HSC. (In some cases, HSC payment of SRA's or departmental incentive pay is also excluded.)
- Effort certification is NOT based on a 40-hour work-week; rather, it should capture all hours expended on HSC-compensated activities.
- Effort distributions should be *reasonable* estimates of activities, recognizing that research, instruction, and clinical activity are often inextricably intertwined and estimates will be necessary in most cases.
- The total of individual effort percentages reported must equal 100%.
- An individual's effort pledged or committed cannot be less than effort paid. If either is less, adjustments will need to be made in the payroll allocation and sponsor approval may be needed for decreases in effort.

ANIMAL AND HUMAN SUBJECT INFORMATION

- PIs must have approved research protocols to conduct research utilizing animal subjects or human research participants at the HSC or any other site.
- Animal & Human protocols must be submitted well in advance of anticipated startup to allow adequate review time. Deadline dates and other information can be found as follows:
IRB: 210.567.2351 or via the web at <http://www.uthscsa.edu/irb/>
Animals: <http://www.uthscsa.edu/lap/index.asp>
- **HIPAA Privacy Rule** information can be found at <http://www.uthscsa.edu/hipaa/>

CONFLICT OF INTEREST

All faculty must disclose significant financial interests annually and, when applying for external funding, indicate on the Certificate of Proposal whether any revisions or updates to the annual statement should be made.

For details regarding the Conflict of Interest policy, see:
<http://www.uthscsa.edu/hop2000/word/7.7.1.d>

COMPLIANCE CHECK

Questions to Consider:

- Have I lived up to my project and fiscal stewardship responsibilities through diligent conduct and oversight of my sponsored project activities?
- How would transactions made on this project be perceived if they were reported in the newspaper?