



THE CATHOLIC UNIVERSITY OF AMERICA  
*Compliance and Ethics Program*  
<http://compliance.cua.edu/>

### ***How do I Comply with Research Requirements?***

Work performed under a Sponsored Award from an external entity involves requirements that the University must meet. Often these requirements are federally-mandated. The Principal Investigator (PI) for each Sponsored Award has primary responsibility for all aspects of that award, including financial management and compliance with all specific award terms and applicable federal requirements. PI's must be aware of the following:

- **Award Processing and Approval:** All applications or proposals for Sponsored Awards must be processed and coordinated through the University's [Office of Sponsored Programs](#), must be made in the name of the University, and must be approved and/or signed in advance by the Provost or his/her designee. See the [Sponsored Award Management Policy](#) for details.

The University may bear a portion of the project costs on a Sponsored Award that are not borne by the sponsoring entity. Such "Cost Sharing" arrangements must be approved by the [Office of Sponsored Programs](#) in advance of the submission of the award proposal. See the [Cost Sharing Policy](#) for details.

- **Award Costing:** All costs charged to Sponsored Awards must be "allowable," "allocable" and "reasonable," must meet specific award terms, and must comply with federal Office of Management and Budget (OMB) requirements. Definitions and specific requirements are set forth in the [Sponsored Award Costing Policy](#).

After-the-fact movements of costs between one Sponsored Award and another, or to a non-sponsored departmental organization code (i.e. "Cost Transfers") are subject to scrutiny by external award sponsors. Such transfers only will be made in accordance with the [Cost Transfers Policy](#).

Questions regarding proper award costing should be directed to the [Sponsored Accounting Office](#).

- **Compensation from Sponsored Awards:** A faculty member must indicate on the sponsor proposal the percentage of effort they intend to devote to the work during the academic year and/or the summer. Anyone receiving salary funding from a Sponsored Award must certify biannually the percentage of effort spent on each award. The [Compensation from Sponsored Awards and Effort Certification Policy](#) implements these requirements.
- **Conflicts of Interest:** Principal Investigators applying for or receiving research funding from any entity external to the University must disclose their "Significant Financial Interests" which might reasonably appear to be affected by such research. The [Conflict of Interest – Externally-Funded Research Policy](#) details the University's disclosure requirements and processes.
- **Subrecipient Monitoring:** When the University enters into a subaward of Sponsored Award funds the University nevertheless retains overall responsibility for the award, and therefore must monitor each subrecipient. The [Subrecipient Monitoring Policy](#) sets forth the obligations of the University and of the PI with respect to subrecipient monitoring.
- **Sharing Restricted Information:** On occasion, research activities may involve information, technology, software, commodities or services that may not be shared with or provided to individuals or entities from specified countries. While most University research falls within an exemption/exception to export control laws, those laws nevertheless can apply to seemingly harmless items such as laptop computers, cell phones, or other mobile devices. Be familiar with the [Export Control Policy](#) before engaging in research.
- **Reporting Non-Compliance:** Immediately report suspected financial irregularities (e.g. theft, fraud, misappropriation, conflicts of interest) to the Vice President for Finance and Treasurer or anonymously through the *Compliance and Ethics Helpline* per the [Reporting Financial Irregularities Policy](#). Individuals who make good faith reports or cooperate in reviews of potential non-compliance may do so free from fear of retribution per the [Non-Retaliatio](#)n Policy.