

The Office of Sponsored Programs, Contracts and Grants supports Elizabeth City State University's (ECSU) research mission by assisting faculty and staff in the procurement of grants, contracts and cooperative agreements from external sponsors

Office of Sponsored Programs

Procedure Manual

This manual contains procedures related to Office of Sponsored Programs policies for grants management and research compliance.

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Table of Contents

<u>SPONSORED PROGRAMS PROPOSAL DEVELOPMENT</u>	<u>3</u>
<u>FACILITIES AND ADMINISTRATIVE COSTS</u>	<u>4</u>
<u>ADMINISTRATION OF CONTRACTS AND GRANTS</u>	<u>5</u>
<u>COMPLIANCE</u>	<u>7</u>
<u>EXPORT CONTROL</u>	<u>9</u>
<u>RESEARCH MISCONDUCT</u>	<u>10</u>
<u>CONFLICTS OF INTEREST AND COMMITMENT</u>	<u>11</u>
<u>SUB-RECIPIENT MONITORING</u>	<u>18</u>

ELIZABETH CITY STATE UNIVERSITY

Sponsored Programs Proposal Development
300.4.1.1

Preamble

As part of its teaching, research, and community outreach mission, Elizabeth City State University (ECSU) conducts scholarly, professional, and creative activities with support from external funding sources such as grants, contracts, and cooperative agreements. This policy and procedure is established to guide ECSU personnel who are engaged in sponsored programs and research activities to ensure that their development and submission, implementation and administration, as well as their fiscal management, are consistent with federal, state and institutional policies. The Office of Sponsored Programs, Contracts, and Grants (SPCG) is the administrative liaison for processing sponsored projects.

Guiding Policy

ECSU Sponsored Programs Proposal Development Policy
<https://www.ecsu.edu/legalaffairs/section300/300-4-1-1.pdf>

ELIZABETH CITY STATE UNIVERSITY

Facilities and Administrative Costs
300.4.1.2

Preamble

Facilities and Administrative (F&A) costs, also known as indirect costs, are expenses incurred by Elizabeth City State University (ECSU) for its facilities and services. F&A costs are not profit, but real costs to ECSU to support sponsored activities. Examples include (building maintenance and operation, utilities, libraries, computer services and other facilities, payroll, accounting, purchasing, research administration, departmental administration, personnel services, and general administration). ECSU attempts to recover all of these support costs, in accordance with guidelines in the U. S. Office of Management and Budget Circular A-21. This policy and procedure governs the negotiation and use of F&A costs, provides guidelines for the recovery of F&A costs and establishes a method for the internal distribution of recovered F&A costs funds resulting from externally-sponsored grants and contracts.

Guiding Policy

ECSU Facilities and Administrative Costs Policy

<https://www.ecsu.edu/legalaffairs/section300/300-4-1-2.pdf>

ELIZABETH CITY STATE UNIVERSITY

Administration of Contracts and Grants
300.4.1.3

Preamble

Elizabeth City State University (ECSU) pursues an aggressive program to obtain resources from federal agencies, state government, foundations, organizations, and individuals to support teaching, research and community projects. This section contains ECSU's policy and procedure to guide program implementation when a proposal or request for external resources becomes an award.

Guiding Policy

ECSU Administration of Contracts and Grants Policy

<https://www.ecsu.edu/legalaffairs/section300/300-4-1-3.pdf>

Procedures for remaining compliant with NSF and NASA Requirements Regarding Findings of Sexual Harassment, Other Forms of Harassment, or Sexual Assault

Background:

The following must be reported as a part of the National Science Foundation (NSF) Award Condition found at :<https://www.federalregister.gov/documents/2018/09/21/2018-20574/notification-requirements-regarding-findings-of-sexual-harassment-other-forms-of-harassment-or>

- Finding/Determination that the reported individual has been found to have violated awardee policies or codes of conduct, statutes, regulations or executive orders relating to sexual harassment, other forms of harassment, or sexual assault;

or

- Placement by the awardee of the reported individual on administrative leave or the imposition of any administrative action on the PI or any co-PI by the awardee relating to any finding/determination or an investigation of an alleged violation of awardee policies

The following must be reported to NASA as an award condition found at

<https://www.nasa.gov/sites/default/files/atoms/files/nasa-fed-reg-notice-harassment-tc-3-10-20.pdf>

- findings/determinations of sexual harassment, other forms of harassment, or sexual assault regarding a NASA-funded Principal Investigator (PI) or co-I,

or

- placement of the PI or co-I on administrative leave, or the imposition of any administrative action relating to harassment or sexual assault finding or investigation.

Required Reporting:

The requirement for NSF is that the “term and condition will be effective for any new award, or funding amendment to an existing award, made on or after the effective date. For these purposes, this means that any finding/determination, placement on administrative leave or the imposition of any administrative action by the institution made on or after the start date of an award or funding amendment subject to the new term will invoke the new notification requirements.” For NASA reporting, “Such reporting must be submitted by the Authorized Organizational Representative (AOR) to NASA’s Office of Diversity and Equal Opportunity at <https://missionstem.nasa.gov/term-conditioninstitutional-harassment-discr.html> within 10 business days from the date of the finding/determination, or the date of the placement of a PI or Co-PI by the recipient on administrative leave or the imposition of an administrative action.”

Therefore, verification of the Principal Investigator (PI) and any Co-PI must be made at the time of award acceptance and any new findings, determinations, or administrative actions must be reported to the Office of Sponsored programs so that the AOR can meet the 10 business day deadline.

Procedure:

1. At the time of notification of any NSF or NASA award, the post-award coordinator will contact the Title IX office with the name of the PI and any co-PI for a check of any reportable findings or determinations.
2. The Title IX office will report back to ECSU’s Compliance Officer within 5 business days regarding any findings, determinations, or administrative actions for the PI and any co-PI.
3. The Title IX office will maintain a list of all PI’s and Co-PI’s on NSF and NASA funded projects and report any new findings, determinations, or administrative actions involving any PI or co-PI on the list within 5 business days of the actions. Additionally, the Title IX Coordinator will check the list members of the list for any qualifying activity monthly. Any new findings or determinations will be reported to ECSU’s Compliance Officer.

ELIZABETH CITY STATE UNIVERSITY

Compliance **300.4.1.4**

Preamble

Elizabeth City State University (ECSU) pursues federal, state and local resources to support teaching, research and community outreach activities. Resources are sought and received from federal agencies, state government, foundations, organizations, and individuals. Compliance policies and procedures have been established regarding the implementation of sponsored projects which include monitoring research on human and animal subjects and hazardous materials to ensure compliance with federal and state regulations as well as ECSU policies.

Guiding Policy

ECSU Compliance Policies and Procedures

<https://www.ecsu.edu/legalaffairs/section300/300-4-1-4.pdf>

Related Procedure

Institutional Review Board Standard Operating Guidelines and Procedures

Hazardous Materials Procedures

Contact ECSU's Office of Environmental Health and Safety/Emergency Management prior to generation of hazardous materials for guidance.

1. Supervisors shall:

- a. maintain a list of waste that will be generated, including the route of disposal for each waste.
- b. Inform employees, students, and others as appropriate if they are generating waste and instruct them on the appropriate route of disposal.
- c. Maintain a registry of AHCs (acutely hazardous materials) in each laboratory with information regarding its hazards, physical and chemical properties, antidotes, precautions, and clean-up procedure. The registry and chemicals shall be discussed with personnel that will work in that laboratory prior to allowing them access to the laboratory. A copy of the registry list shall be sent to OSH and updates telephoned in when an AHC is added or discontinued.

- d. Ensure that all waste is identified, packaged, and removed in accordance with the appropriate manual and guide on a continuous basis.
- e. Inspect areas under their supervision that are generating or have generated waste, to insure that the area is clear of all waste prior to termination of responsibility in that area.

2. Each waster generator shall:

- a. Limit ordering of laboratory materials and other potential sources of waste to the amounts needed. The disposal cost of waste typically exceeds the purchase price of the material.
- b. Be cognizant that steps can be taken to detoxify and/or neutralize waste and include those steps in the generation procedures as practical.
- c. Practice waste reduction in accordance with the appropriate manual.

3. Any unclaimed waste shall remain the liability of the generating supervisor or the supervisor's department. OSH will work in a cooperative effort to identify and dispose of such waste but shall not assume responsibility for any unclaimed waste.

These procedures shall serve as a guide for laboratory researchers, professors, students, and other ECSU personnel. ECSU shall comply with the hazardous waste disposal procedures issued by the Environmental Protection Agency and the Department of Transportation. PIs applying for grants and contracts and proposing the use of hazardous materials shall cite the specific policy to guide the research. Project proposals involving hazardous materials shall also include the name of the company with which ECSU has contracted for the disposal of hazardous chemicals. All generators of waste shall include a line item in their budget for disposal of waste.

Export Control 300.4.1.5

Preamble

Elizabeth City State University (ECSU) pursues federal, state and local resources to support teaching, research and community outreach activities. Resources are sought and received from federal agencies, state government, foundations, organizations, and individuals. Export Control policies and procedures have been established regarding the implementation of these activities with the goal to recognize the importance of compliance with all applicable export control regulations in the conduct of university activities.

Guiding Policy

ECSU Export Control Policy

<https://www.ecsu.edu/legalaffairs/section300/300-4-1-5.pdf>

Procedures

ECSU faculty, staff and students shall contact the Office of Sponsored Programs Contract and Grants (SPCG) on matters related to export control regulations and adhere to the directives from SPCG that will assist them in complying with these regulations. Before entering into a research project, exporting technology or interacting with foreign nationals in research, all relevant parties involved, including the faculty member(s), the graduate student(s), the department head(s) and the dean(s) shall contact SPCG for assistance in determining both the nature and extent of the restrictions required.

- (a) All PI or Project Directors must complete the Export Control Check List.
- (b) All Faculty, staff, and students traveling out of the United States or engaging in international communications must comply with the Export Control Policy.

ELIZABETH CITY STATE UNIVERSITY

Research Misconduct
300.4.1.6

Preamble

Elizabeth City State University (ECSU) pursues federal, state and local resources to support teaching, research and community outreach activities. The major responsibility for maintaining standards of intellectual integrity rests with the individual scholars and with the departments in which they work. ECSU expects the highest standards of professional and ethical conduct. To that end, unethical behavior in research represents a breach of the confidence among faculty, staff, and students as well as other research scientists that is central to the advancement of knowledge.

Guiding Policy

ECSU Institutional Policy on Research Misconduct
<https://www.ecsu.edu/legalaffairs/section300/300-4-1-6.pdf>

Conflicts of Interest and Commitment

300.4.1.7

Preamble

All EHRA Faculty members and non-Faculty EHRA staff (“Covered Employees”) of Elizabeth City State University (ECSU) are subject to policies concerning conflicts of interest and conflicts of commitment affecting ECSU employment and external professional activities. This policy is based on policies and guidelines adopted by the UNC system Board of Governors, federal and state law, and federal agency sponsor requirements.

Guiding Policy

ECSU Conflicts of Interest and Commitment Policy

<https://www.ecsu.edu/legalaffairs/section300/300-4-1-7.pdf>

Procedures: To facilitate disclosure and to ensure appropriate uniformity across the ECSU, each Covered Employee will complete their annual Conflicts of Interest disclosure.

The purpose of this disclosure is to identify employees' activities that may lead to actual or potential conflicts of commitment or interest so that appropriate administrative intervention or COI management plans may address the problems. The Provost and/or their designated administrative Conflict of Interest (COI) Officer and the Research Compliance Officer are to approve the annual disclosure forms, which imply that the Provost and/or the designated administrative COI Officer and the Research Compliance Officer have reviewed the disclosure. No further action will be required if all questions are answered "no".

Further disclosure and review are required if questions elicit any "yes" responses on the COI disclosure or on any mid-year revisions or updates of the annual form. The employee must update their disclosure by completing an additional COI disclosure online. Suggested provisions or plans for eliminating or managing conflicts should be included in these additional forms where indicated. Examples of some (but not all) possible provisions for conflict management plans are:

- Public disclosure of the significant financial interests or external activities;
- Monitoring of activities by disinterested university officials to assure that conflicts do not arise;
- Modification of the research plan;
- Apply for a waiver – the covered employee must sustain the burden of demonstrating that their objectivity would not be adversely affected or ECSU interests otherwise would not be damaged. A waiver must be reviewed by next highest administrator;

- Cessation of the pertinent outside activities;
- Divestiture of the pertinent financial interests; and
- Severance of the relationships that create actual or potential conflicts.

Since these forms have direct bearing on the employment of individuals with ECSU, all disclosure forms, (the annual form and accompanying forms) and associated documents will be maintained in the employee file or electronically through the Activities, Interests, and Relationship Management System (AIR).

ECSU will make significant financial conflict of interest information disclosed available by written response to the COI Officer. Once the request is received by the Research Compliance Officer, a response will be given within five (5) business days and update such information as specified by rule. The elements of the significant financial COI information to be publicly posted are:

- Covered Employee's name;
- Covered Employee's title;
- Covered Employee's role with respect to their ECSU employment responsibilities;
- Name of entity in which the significant financial interest is held;
- Nature of the significant financial interest; and
- Approximate dollar value of the significant financial interest, or a statement if the interest is one where value cannot be readily determined through public prices or other reasonable measures of fair market value.

Covered Employees receiving reimbursed travel or sponsored travel related to ECSU employment responsibilities are required to report the purpose of the trip, the name of the sponsor/organizer, destination, and duration. If the sponsor is a federal, state, or local government agency, or another Institution of higher education, such reimbursed travels are not required to be reported [20 U.S.C 1001 (a)].

Review and Approval of Activities and Plans for Eliminating or Managing Conflicts

The Associate Vice Chancellor of Academic Affairs or their designee, in conjunction with the Research Compliance Officer, has the initial responsibility to review and approve or disapprove the disclosure forms filed with him or her by the Covered Employees within that unit. Specifically, the Research Compliance Officer will provide a secondary assessment and recommendations if necessary. The Associate Vice Chancellor should be familiar with the definition of "Financial Interest to differentiate between Category II and Category III activities and relationships. Category III activities are presumptively considered to be non- allowable.

The Associate Vice Chancellor of Academic Affairs may refer any question regarding an annual disclosure to the Office of Research Compliance for review and decision for Covered Employee's involvement in possible Category II and III activities as described above.

If a potential conflict is determined to exist, written plans for eliminating or managing the conflict will be developed in consultations between the employee, the Office of Research Compliance, and the Covered Employee's supervisors (up to and including deans of academic

units as appropriate) and presented to the Vice Chancellor for Academic Affairs for all Conflicts of Interest. The COI Management Plan for all categories will be submitted to the Provost. It will then be presented to the chair of the ECSU Research Ethics and Oversight Committee (see below) for final approval. An adverse decision of the Committee to a proposed management plan may be appealed to the appropriate Vice Chancellor. The Department Chair of the Covered Employee will be responsible for assuring the implementation and/or monitoring of the conflict management plan. Documentation of all decisions on activities and associated conflict management plans will be maintained in the employee's personnel folder and in the Office of Research Compliance.

In order to fulfill the certification requirements of grant and contract funding agencies (e.g., the NIH and NSF), the Research Compliance Officer will use the COI disclosure information to report any perceived or potential COI to the sponsor or to certify to potential funding agencies that this Institution has a conflict of interest policy consistent with NIH and NSF guidelines and that to the best of our knowledge all provisions of the policy have been followed with respect to proposals submitted to the agencies by ECSU faculty and staff.

If, after initial review of any disclosure by the department head, or dean, or vice chancellor, questions remain regarding ethical issues or if disagreement exists between the Covered Employee and the administration regarding the permissibility of activities, or the COI management plan, the situation may be referred to a faculty/administrative advisory committee for review of conflicts of interest and commitment. This committee, the *ECSU Ethics and Research Oversight Committee* will be chaired by the Chief Research Officer. Appropriate individuals will be appointed members. The Research Compliance Officer will serve as an ex-officio member and ECSU General Council shall be present. Decisions by this committee will be presented to the Chancellor for his or her concurrence and, if approved, will become the University's final position. If the activity at issue involves external support (grant, contract or cooperative agreement), the Director of Sponsored Programs shall inform the sponsor in accordance with the Sponsor's policy and guidelines of the COI. Whenever human subjects are involved in an activity presented to the Research Compliance Office (including approvals of conflict management plans), the ECSU Institutional Review Board (IRB) will be confidentially notified of the issue and the Committee's actions.

Institutional Conflict of Interest

Upon annual request, the Associate Vice Chancellor of Academic Affairs shall prepare a disclosure listing all profit-making entities in which ECSU has a significant financial interest. This disclosure shall be updated during the year as new relations develop and old ones terminate. This disclosure and its updates will also be submitted to the Chief Research Officer who shall distribute the disclosure to the Chancellor, the Vice Chancellors and Deans, and the Research Ethics Oversight Committee. Copies of the disclosure and updates shall also be distributed to those university administrative offices charged with approving and administering grants and contracts and other regulatory committees (for example, Office of Sponsored Programs, Office of Contracts and Grants Administration, and IRB).

Units submitting proposals for external funding to commercial entities may not be aware of possible institutional conflict of interest issues. Thus, the Office of Sponsored Programs shall have the primary responsibility of notifying the Office of Research Compliance, Chief Research

Officer and the submitting unit of the University's conflict of interest as part of its regular procedures for the review and approval of such applications.

The Office of Research Compliance or the Vice Chancellor of Academic Affairs or his/her designee shall then develop a plan to manage the institutional conflict of interest after consultation with the submitting unit and other relevant university offices. The conflict management plan shall be submitted to the Chair of the Research Ethics Oversight Committee for review. The Chair of the Committee may approve the plan (with or without mandatory changes) or disapprove the plan. ECSU acceptance of contracts and grants related to a management plan is contingent upon approval of the management plan by the Committee. A negative decision by the Committee may be appealed to the appropriate Vice Chancellor. An institutional conflict management plan may range from a simple disclosure of ECSU interest in publications and reports emanating from the grant or contract to complete ECSU divestiture of the financial interest. The institutional conflict management plan shall be separate from and in addition to any conflict management plans for conflicts of interests of individuals (e.g., the principal investigator) involved in the grant or contract).

When considering an institutional conflict of interest management plan, the Research Ethics Oversight Committee shall a) include as voting members, one or more individuals from the general public who have no direct or indirect relationship with ECSU, i.e., the individuals and their spouses or other dependents must not be current employees or students of the University; and b) recuse from the deliberations of the Committee any ECSU member of the Committee who has been involved in the negotiation, approval, or implementation of the relationship that is the basis of the actual or perceived conflict of interest. The general public members of the Committee should be individuals that have sufficient education or experience to understand both the issues before the Committee and the possible impacts of the Committee's decisions on the general public.

Arrangements for plan implementation and oversight shall explicitly be part of an institutional conflict management plan. Implementation and oversight will usually be the joint responsibility of the submitting unit and the Chief Research Officer. However, other arrangements shall be made for plan implementation and oversight if, in the judgment of the Research Ethics Oversight Committee, such arrangements are necessary for the effective management of the conflict.

External Professional Activity for Pay Procedures

A Covered Employee who plans to engage in external professional activity for pay shall complete the "Notice of Intent to Engage in External Professional Activity for Pay" (hereinafter referred to as "Notice of Intent") which shall solicit, at a minimum, these data elements:

- Date of filing
- Name of covered employee
- Sponsor or organization's description;
- Nature of proposed activity;
- Beginning date and duration of proposed activity;
- Estimate of time devoted to activity;
- Identify missed duties or responsibilities;

- Identify any use of ECSU or State property or resources;
- Any funding provided by sponsor or organization that supports your University employment responsibilities; and
- Any ownership interest or holding an Executive position in the contracting sponsor or organization.

The Notice of Intent shall be filed with the head of the department in which the individual is employed. A separate "Notice of Intent" shall be filed for each such activity in which an employee proposes to engage. Unless there are exceptional circumstances, the "Notice of Intent" shall be filed not less than ten (10) calendar days before the date the proposed external professional activity for pay is to begin. Additionally, Covered Employees shall disclose their financial interest consistent with this Policy on Conflicts of Interest and Commitment. The Notice of Intent Format: The format for giving notice of Intent should follow the sample notice form available from the Office of Academic Affairs.

Approval of a "Notice of Intent" may be granted for a period not to exceed the balance of either 1) the fiscal year (in the case of twelve-month employees and employees with contract service periods that include the summer session) or 2) the academic year (in the case of nine month employees with no summer session contract period) remaining as of the date of approval; if the approved activity will continue beyond the end of the relevant fiscal or academic year in which it was begun, an additional "Notice of Intent" must be filed at least ten days before engaging in such activity in the succeeding relevant year.

Except as set out in paragraph 5 below, the "Notice of Intent" shall be considered as follows: If, after a review of the "Notice of Intent" and consultation with the Covered Employee, the Department Head determines that the proposed activity is not consistent with this policy statement of the Board of Governors and Elizabeth City State University, the Covered Employee shall be notified of that determination within ten (10) calendar days of the date the "Notice of Intent" is filed. In the event of such notification by the department head, the Covered Employee shall not proceed with the proposed activity but may appeal that decision to the next higher administrator to whom the department head reports and then to the Covered Employee's Vice Chancellor and then to the Chancellor or the Chancellor's designee. A decision on any such appeal shall be given to the Covered Employee within ten calendar days of the date on which the appeal is received. The decision of the Chancellor is final. Appeals shall be made in writing on the "Notice of Intent" form.

If the "Notice of Intent" discloses 1) a proposed activity for an entity that provides funding that directly supports the Covered Employee's ECSU Employment Responsibilities or activities or 2) a proposed activity for a private entity in which the Covered Employee or member of the Covered Employee's immediate and/or extended family holds an equity or ownership interest or holds an office, the procedure set out in Item 3 above shall be modified as follows: The decision of the Department Head to approve the activity shall be reviewed promptly and approved or disapproved within ten (10) days of receipt by the administrative officer to whom the Department Head reports, and appeals of a disapproval by that officer shall be to the appropriate vice chancellor or the chancellor's designee.

Departmental summaries of all "Notices of Intent" filed and of actions taken in response to such "Notices of Intent" during the preceding fiscal year shall be submitted by department heads to the Chancellor or chancellor's designee each July. As initiated by the UNC General Administration Office of Research and Sponsored Programs on or before September 1 of each year, the Chancellor will provide an annual summary report to the President.

External professional activities for pay performed for another Constituent Institution or agency of the State of North Carolina must comply with state policies governing dual employment and compensation, unless an exception to those State policies is expressly authorized by the Chancellor.

In addition, senior academic and administrative officers may be subject to special regulations regarding honoraria. Please refer to UNC Policy Manual 300.2.2.2[R].

If the external professional activity for pay is wholly performed and completed outside of the academic year by Covered Employees serving on academic year contracts, said Covered Employees do not need to file Notices of Intent with their unit head provided that the activity does not conflict with this policy statement of Elizabeth City State University and of the Board of Governors and is not conducted concurrently with a contract service period for teaching, research, or other services to Elizabeth City State University during a summer session.

ECSU employees not complying with these procedures will be subject to disciplinary action. Department heads are held responsible for proper reporting.

Special Provisions

These regulations shall not be required of Covered Employees serving on academic year contracts, if the external professional activity for pay is wholly performed and completed outside the academic year, provided the activity does not conflict with the policy statements of the institution or Board of Governors and is not conducted concurrently with a contract service period for teaching, research, or other services to the institution during a summer session. Notwithstanding this policy, UNC Policy Manual 300.2.2.1[R], covered employees will disclose their significant financial interests in accordance with the Board of Governors' policy on Conflict of Interest and Commitment UNC Policy Manual 300.2.2 and the implementing policies and procedures of ECSU.

Enforcement of the Policy:

If a possible breach in the policy/procedures occurs, the appropriate dean shall consult with the covered employee and his/her chair or department head. If no resolution is forthcoming, the dean shall refer the case to the appropriate associate vice chancellor. The associate vice chancellor shall consult with the Provost and shall initiate an investigation and/or hearing as determined by university policies. Such sanctions may range from administrative intervention to dismissal from employment, all in accordance with applicable university policies.

Consequences of Covered Employee Non-Compliance for Sponsored Research

When a Covered Employee fails to comply with ECSU's Financial Conflict of Interest policy or

the management plan, ECSU shall adhere to the procedure detailed in the OSP Procedure Manual:

- Complete a retrospective review of the Covered Employees activities and the funded research project to determine any bias in the design, conduct or reporting of research;
- Document the retrospective review consistent with the regulation; and
- Document ECSU's determination as to whether any funded research, or portion thereof, conducted during the period of time of the Covered Employee's non-compliance with the ECSU Financial Conflict of Interest policy or Financial Conflict of Interest management plan, was biased in the design, conduct, or reporting of such research.
- If bias is found, ECSU shall notify the funding agency promptly and submit a mitigation report the funding agency that shall address the following:
 - Impact of the bias on the research project; and
 - ECSU's plan of action or actions taken to eliminate the effect of the bias.

Institutional Reporting of Identified Financial Conflicts of Interest

Prior to ECSU's expenditure of any funds under a funded research project, the institution shall provide to the funding agency awarding component any Covered Employee's significant financial interests found by ECSU to be conflicting and ensure that the institution has implemented a management plan in accordance with the revised regulations. Further, ECSU will provide annual FCOI reports for the duration of the project period. Any FCOI report required under the revised regulations shall include at a minimum, the following information:

- Research Project Number;
- Name of Principal Investigator;
- Name of Covered Employee with the financial conflict of interest;
- Name of the entity with which the Covered Employee has a financial conflict of interest;
- Nature of the financial interest;
- Value of the financial interest or a statement if the interest is one whose value cannot be readily determined through to public prices or other reasonable measures of fair market value.
- Description of how the financial interest relates to the funded research and the basis for
- ECSU's determination that the financial interest conflicts with the research.
- Description of key elements of ECSU management plan including:
 - Role and principal duties of the conflicted Covered Employee in the research project;
 - Conditions of the management plan;
 - How the management plan is designed to safeguard objectivity in the research project;
 - Confirmation of the covered Employee's agreement to the management plan;
 - How the management plan will be monitored; and
 - Other information as needed.

ELIZABETH CITY STATE UNIVERSITY

Sub-recipient Monitoring 300.4.1.8

Preamble

Elizabeth City State University partners with other entities to conduct scholarly, professional and creative activities with support from external sources such as grants, contracts and cooperative agreements. This policy is established to ensure that Federal award information and compliance requirements are provided to sub recipients. A sub recipient is the legal entity to which a subaward (an award of financial assistance, excluding procurement for goods or services) is made and which is accountable to the prime recipient for the use of the funds provided. The sub recipient's performance is measured by meeting federal program objectives. The University shall perform procedures to provide reasonable assurance that the sub recipient activities are monitored, audit findings are resolved, and the impact of any sub-recipient noncompliance issues are evaluated for appropriate corrective action on audit findings. ECSU adheres to Uniform Guidance 2 CFR 200.330 for the administration of sub recipient monitoring and management.

Guiding Policy

ECSU Sub-recipient Monitoring Policy

<https://www.ecsu.edu/legalaffairs/section300/300-4-1-8.pdf>

Procedures

The Principal Investigator (PI) performs the following activities to complete the sub- award process that is prior approved by the awarding agency:

- Selects sub-recipients that have demonstrated the ability to achieve high standards of scientific and financial performance;
- Reviews Technical Performance Reports from the sub-recipient for timeliness, accuracy, clarity, comprehensiveness, and responsiveness to project objectives;
- Reviews and approves invoices received from sub-recipients to verify that expenses incurred are allowable, reasonable, and consistent with the project budget and work performed and that cost sharing is appropriately reflected if applicable;
- Communicates with the sub-recipient when improvement is necessary. This may require meetings and/or onsite visitations with the sub-recipient;
- Brings questions and problems regarding sub-recipient performance and expenses incurred to the attention of the responsible Contracts and Grants Officer (C&G);
- Delays payment of invoices if technical or financial reports are delinquent or insufficiently detailed then notifies OSP Compliance;
- Maintains written documentation (i.e. approved invoices, financial and progress reports, notes, meeting agendas, minutes, correspondence, travel documents) of monitoring efforts, and provides it to SP upon request. PI advises sub-recipients (through the sub-

award agreement) of requirements imposed on them by federal laws, regulations, and the provisions of contracts or grant agreements as well as any supplemental requirements imposed by ECSU.