**OEO PPM: 6.6**

**CASE PROCESSING: Special Considerations: Sponsored Projects Reporting Requirements**

**Approved by: Jess Morrison, Director, OEO/AA**

**Effective Date: Updated December 2024**

**Purpose:** Sponsors of university research funding have taken a strong position on addressing sexual harassment and code-of-conduct violations within programs funded by their agencies. Because these requirements apply to the University, the OEO/AA must coordinate with appropriate entities, specifically Office of Sponsored Projects, Office of Research Integrity & Compliance, OGC, and the cognizant department when a PI or co-PI or other key individual is paid off of a sponsored project.

Please note that after careful review of the federal and sponsor-specific reporting obligations, it has been determined that the Authorized Official (AO) for submitting formal reports to the sponsor is the Director of the Office of Sponsored Projects (OSP). However, to help facilitate prompt internal communications, the Associate Director, Grants in OSP is working with the Associate Vice President of Research Integrity & Compliance (AVPRIC) to provide support to University departments and researchers to understand when a formal report is required and ensure compliance with any applicable reporting requirements.

OSPs processes for reporting and university guidance can be found here: <https://osp.utah.edu/harassment-reporting/>.

**OEO/AA Procedure:**

1. **New Complaints:**  When a new Complaint is accepted, the OEO/AA Program Assistant will check two locations to determine if a Respondent is a recipient of any research funding:
   1. **Peoplesoft Job Data** through CIS under UU Dist. tab
      1. Click “view all” in the last scroll area to view all of the “occur codes.” Look for the following funding project codes in the “Activity/Project” column to determine whether there is any funding coming from the following sources:
         1. 501xxxxx and above (all account types summarized here: <https://fbs.admin.utah.edu/gca/gca-funding-agency/> [note: all NIH codes are identified as “HHS” at this link])
      2. Information on funding codes can be found at: <https://fbs.admin.utah.edu/gca/gca-funding-agency/> (note: all NIH codes are identified as “HHS” at this link)
   2. **Research Projects through CIS or at** <https://research.apps.utah.edu/uofu/fac/research-portal/#!/>
      1. Input the individual’s UNID. Select “awards.” A list will generate of all the awards where this individual is or was the PI.
         1. For larger lists, download into Excel and search
   3. If there are any questions, please check with the Office of Sponsored Projects, Associate Director - Grants
   4. Funding will be noted in Intake processing email: YES, relevant funding codes above 501xxxx
2. **Email Notification:**
3. If the accepted Complaint falls within OEO/AA jurisdiction and the OEO/AA proceeds to an investigation process, and the OEO/AA has identified that the Respondent has sponsored projects/research activity, the OEO/AA Consultant sends an email to the VP for Research, AVPRIC, and Office of Sponsored Projects Associate Director – Grants to notify them that OEO/AA received a Complaint against an individual who is involved in sponsored projects/research activity.
   1. Upon receipt, the Office of Sponsored Projects Associate Director – Grants will verify the Respondent’s research activity and ask the Respondent’s department dean and chair to determine if any action(s) have been taken that would require the submission of a formal report to a sponsor (as outlined on the OSP website).
   2. The OSP Associate Director – Grants will also inform the cognizant dean and chair of any actions subsequently taken that would require notification to OSP.
   3. The OEO/AA consultant will provide additional email notification to these entities at the conclusion of the Complaint process, along with information indicating whether the Respondent was determined to have violated University Policy.
4. If the Complaint does not fall under OEO/AA jurisdiction or the OEO/AA does not proceed to an investigation process, the OEO/AA will notify the Complainant and include the following language:  
     
   “If you have experienced unprofessionalism *in the research context*, you may contact the University’s Research Integrity Officer (RIO) to discuss and address concerns of unprofessionalism. The RIO can be contacted by emailing [Zachary.Mitchell@hsc.utah.edu](mailto:Zachary.Mitchell@hsc.utah.edu).”
5. **What needs to be reported**: This process is managed by OPS in partnership with other non-OEO offices. The OSP Reporting Matrix (<https://osp.utah.edu/policies/research-conduct/reporting-matrix.php>) will track each agency’s requirements and the Process Guidance (<https://osp.utah.edu/policies/research-conduct/process-guidance.php>) will outline the exact steps and information required to complete a formal report.  
     
   The OSP Associate Director – Grants will work closely with department leadership and appropriate entities to determine when and how a formal report will need to be made to a sponsor.

The OSP Matrix and corresponding Process Guidance outline the key factors in making a determination of whether or not to submit a report to a sponsor and how to escalate if a report may be necessary.

1. Other non-OEO related issues. Several sponsors also prohibit other types of behavior such as bullying and (non-discriminatory) harassment. OSP and ORIC are aware of this issue and are aware they will need to work with other entities such as HR, Office of General Counsel (OGC), and/or Office of Faculty for non-OEO related issues.

**Resources:**

**Office of Sponsored Projects (OSP).** This is the University office required to report to sponsors if project personnel are involved in university research and named as a respondent.

<https://osp.utah.edu/>

Resource Contacts (https://osp.utah.edu/about/directory/index.php):

* Brent Brown, Executive Director
* Todd Bjorklund, Associate Director – Grants
* Laurel Duncan, Associate Director - Communications

**Office of Research Integrity & Compliance (ORIC**). This office is well versed in the requirements and can help the university research community understand those requirements.

<https://integrity.research.utah.edu/key-contacts.php>

<https://integrity.research.utah.edu/org-chart.php>

Resource Contacts:

Caren Frost, Associate Vice President for Research Integrity and Compliance

Zachary Mitchell, Research Integrity Officer

**University of Utah Resources to assist with Federal and Non-Federal Sponsor Requirements (These are resources developed by The Office of Sponsored Projects).**

University Guidance for Developing Safety Plans:

* General Harassment Reporting and Code-of-Conduct Violations: <https://osp.utah.edu/policies/research-conduct/>
* NIH: <https://osp.utah.edu/grants-toolbox/nih/nih-conference-safety-plans.php>
* NSF: <https://osp.utah.edu/grants-toolbox/nsf/nsf-conference-code-of-conduct.php>

Federal requirements:

**National Science Foundation:**

* Notification requirements: [Federal Register :: Notification Requirements Regarding Findings of Sexual Harassment, Other Forms of Harassment, or Sexual Assault](https://www.federalregister.gov/documents/2018/09/21/2018-20574/notification-requirements-regarding-findings-of-sexual-harassment-other-forms-of-harassment-or)
* NSF Guidance Document: https://new.nsf.gov/policies/pappg/24-1n
* <https://new.nsf.gov/stopping-harassment>

**National Institute of Health:**

* <https://www.nih.gov/anti-sexual-harassment>
* <https://grants.nih.gov/grants/policy/harassment/policy-requirement.htm>

National Aeronautics and Space Administration (NASA)

* <https://missionstem.nasa.gov/filing-a-complaint.html>

Non-Federal Requirements:

See Reporting Matrix: <https://osp.utah.edu/policies/research-conduct/reporting-matrix.php>