
Compliance Matrix

Requirement for Institutional Research Policies	Responsible Office	Signatory Authority	Responsible VP/Dean	Minimum Compliance	Potential Penalty
Research Integrity *Location: Academic Grants Office; Faculty Handbook	Research Integrity Office	Research Integrity Officer (To be named)	RIO V.P.A.A.	Develop policies and procedures to deal with allegations of research misconduct. NIH requires annual report.	Awardees can be subject to suspension, termination, or debarment actions.
Conflict of Interest Location: AGO, Faculty Handbook, Policy Manual	Academic Grants Office (AGO)	Director, Academic Grants (Dr. Susan McCarthy)	V.P.A.A.	Resolve conflict or decline funding.	Declination of funding if resolution is not achieved.
Protection of Human Subjects Location: OHRP Manual, AGO, Faculty Handbook	Institutional Review Board	Chair, IRB Chair (Dr. Doug Hall)	V.P.A.A Human Protections Administrator	Review and apply policies as approved by the OHRP	Suspension of project support. Potential civil/criminal institutional liability if subject is harmed. Potential civil/criminal liability for individual researchers.
Animals in Research Location: Faculty Handbook, AGO, IACUC Chair's Office	IACUC Chair	Chair, IACUC (Dr. Tim Raabe)	Dean , SET VPAA	Review and apply institutional policies and federal regulations	Non-compliance may result in research shutdown. Federal agency may withdraw funding for individual project and for all institutional projects.
Recombinant DNA Location: BSC Chair's Office, SET Dean's Office, Faculty Handbook	Biohazards Safety Committee	Chair, Biohazards Safety Committee Chair (Dr. Gary Ogden)	Dean, SET VPAA	Develop and observe policies involving use of recombinant DNA molecules.	Suspension, limitation, or termination of financial support for recombinant and/or DNA projects and of NIH funds for other recombinant DNA at the institution, or required pre-approval for any or all DNA projects at the institution.

Requirement <u>Employee Directives</u>	Responsible Office	Signatory Authority	Responsible VP/Dean	Minimum Compliance	Potential Penalty
Drug Free Workplace * Location: Policy Manual; Human Resources	Human Resources	President	V.P. Finance & Admin	Develop and implement policies in accordance with federal regulation; distribute to all employees *annually distribute to all employees and/or students as required.	Suspension, termination, or debarment of the Institution or individuals affected. *sanctions may include: repayment of any or all forms of federal financial assistance received while in violation; termination of any or all forms of financial assistance; or suspension from receipt of federal funds to the Institution for a period of up to 18 months.
Civil Rights Requirements: 1. Civil Rights Act of 1964 2. Employment of the Handicapped 3. American with Disabilities 4. Title XI-Sex discrimination 5. Age Discrimination 6. Equal Opportunity 7. Affirmative Action Location: Policy Manual	Human Resources	President	V.P. Finance & Admin.	Assurance of compliance must be on file in Human Resources.	Awards may not be made to an institution that has not filed assurances: 1,4,5 violation of assurance can result in loss of federal funding. 2 violation can result in withholding of payments, termination, suspension or debarment; 6 contract awards cannot be made, possible cancellation, termination, suspension of current contracts, referral to EEOC for appropriate criminal/civil action 7 withholding of payments, termination or suspension of contract, debarment.

Requirement General Requirements	Responsible Office	Signatory Authority	Responsible VP/Dean	Minimum Compliance	Potential Penalty
Hazardous Materials *Location: Policy Manual	Physical Plant Director	President	V.P. Finance & Admin.	Notification to employees of potential hazardous materials; Material Safety Data sheet five days before delivery of material	Non-award of funds for failure to certify; failure to comply will result in loss of funds and sanctions
Occupational Safety and Health Location: Director of Physical Plant Office	Safety Officer (Director, Physical Plant)	President	V.P. Finance & Admin.	Stipulation that performance of an award will not take place under conditions that are unsanitary or hazardous	Termination of grant or cancellation of contract
Radiation Safety Location: Radiation Safety Manual, SET Dean's office	Radiation Safety Officer (Dr. Fred Alvarez)	Radiation Safety Officer; SET Dean	VPAA/VPFA	Maintain licenses (2 yr) from Texas Dept. of State Health Services, Bureau of Radiation Control and site inspection for x- ray machines & storage of isotopes.	Loss of licensure and ability to use equipment and/or materials. Possible violation of Hazardous Materials regulations.
Davis Bacon Act Walsh-Healey Public Contracts Act Service Contract Act Contract Work Hours & Safety Standards Act of 1962	Director, Human Resources	President	V.P Finance &Admin.	Pay wages in accordance with wage rate determination	Termination of grant or cancellation of contract
Facilities Management Location: Policy Manual; Physical Plant Office	Director, Physical Plant	N/A except by certification on federal contract	President or V.P. e & Admin.	Adhere to "Regulatory Compliance for Facilities Managers"	Loss of federal funding

Requirement Fiscal Management	Responsible Office	Signatory Authority	Responsible VP/Dean	Minimum Compliance	Potential Penalty
A – 21 “Cost Principles for Education Institutions” Location: Finance Office; AGO	Finance Office Account Operations	Director of Account Operations; PI/PD for monitoring project costs	VP for Finance & Admin.	Establish written policies for the costs applied to all grants and contracts; pay only those costs that are allowable, reasonable, allocable, consistently treated (standardized), and conform to the limitations or exclusions of the sponsor.	Disallowance of direct and indirect costs charged to grants or contracts.
A – 110 “Uniform Administrative Requirements for Grants and Agreements...” Location: Finance Office; AGO	Finance Office; pre-award AGO	Director of Account Operations	V.P. Finance & Admin.	Establish written policies for general grants systems management	Failure to implement systems could result in audit findings leading to cost disallowances and/or termination of federal funding if processes are not corrected.
A – 133 Location: Finance office; AGO	Financial Aid; Finance Office	VPFA President	VPFA President	Comply with all federal requirements for management of federally-supported projects; (Note: programmatic accountability in performance of projects/programs rests with Academic Affairs.)	Potential for current or retroactive cost disallowances, adverse systems management findings, loss of federal funding if systems are not corrected.
Certification of Accuracy of Indirect Costs (Applies only to contracts with DoD)	Finance Office	Director, Finance	VPFA	Annual signature on certification form from ONR	Non-recovery of indirect costs; penalties of perjury for false certification

Requirement Procurement Policies	Responsible Office	Signatory Authority	Responsible VP/Dean	Minimum Compliance	Potential Penalty
Buy America Location: Finance Office	PI/PD; Finance Office, AGO (pre-award)	faculty principal investigators; Director, Account Operations for approval of charges.	VP Academic Affairs VPFA	Ensure purchasing only American-made products in contractual arrangements; inform faculty of regulations	False certification may be deemed fraudulent and result in debarment.
Fly America Location: Comptroller	PI/PD; Finance Office, AGO (pre-award)	faculty principal investigators; accounts payable if tickets purchased through university budget line.	VPFA	Use of American carriers; inform faculty of regulations	Disallowance of costs charged to contract and/or grants
Other purchasing requirements as mandated in A-21, including bid standards and related areas Location: AGO	PI/PD for each award; Finance Office, Director Physical Plant, AGO	Finance Officer and/or Account Operations, faculty principal investigators; institutional compliance the President.	VP for Finance & Admin.; President	Comply with procurement standards as established by individual agencies and A-21; inform principal investigators of regulations	Disallowance of costs charged to grants and/or contracts.

Requirement Faculty and Institutional Certification	Responsible Office	Signatory Authority	Responsible VP/ Dean	Minimum Compliance	Potential Penalty
Lobbying Location: AGO	PI/PD; President	Submitting faculty member; President	President	Certification that no appropriated funds were or will be used to influence Congress in making an award; if non-appropriated funds were used, full disclosure must be made. Note: anyone traveling on federal funds who lobbies is in violation.	Awards will not be made without appropriate certifications filed; persons making prohibited expenditures will be subject to a civil penalty from \$10,000 to \$100,000 per expenditure.
Debarment & Suspension Location: AGO	President	President	President	Certification that applicant, nor principals, nor researchers, are presently debarred, been convicted of a civil judgment or criminal offense, or been terminated in a public transaction for cause or default	Possible termination, debarment or suspension for the awardee.
Non-Delinquency of Federal Debt Location: AGO	PI/PD; President	President (PI must certify that s/he is not delinquent prior to president signing)	President	Periodically survey financial officers for their knowledge of federal debt payments due; inform faculty of their obligations to disclose federal debt delinquency in submission process.	May not make awards to delinquent institutions or individuals; agencies can collect delinquent debt by offsetting payments due under other federal programs.