



Office for Sponsored Research and Award Administration
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NEW SETUP COMPLIANCE HOLD PROCESS IMPLEMENTATION DATE OCT 22, 2019

Federal Requirements: It continues to be a requirement that grant funds are not spent on human or animal subject testing until an appropriate protocol is in place. The PI is primarily responsible for IRB/IACUC compliance.

Summary of OSRAA Process Change: OSRAA is changing the index setup process to reduce faculty administrative burden, reduce unnecessary cost transfers, and speed setup of indexes. For projects that include human/animal subjects but do not have an approved protocol at the start of the project, OSRAA will setup an index with half the awarded budget. This is in recognition that most research projects include a portion of the project that does not involve human/animal subjects and, in our experience, half of the awarded budget is sufficient to complete this initial project phase. It is up to the PI to determine if they can use the available budget in a way that is consistent with their compliance requirements.

Details of OSRAA Process Change:

No Change to OSRAA Process for awards with Sponsor Hold Requirement: If OSRAA receives an award that clearly states the sponsor prohibits research (i.e. no money can be spent) until an IRB and/or IACUC approval is submitted to the sponsoring agency, the OSRAA contract officer will hold the award until the sponsor acknowledges receipt of the approval.

Previous OSRAA Process for compliance setup holds with no specific sponsor hold requirement: If OSRAA received an award with no special terms regarding IRB/IACUC protocols, the award intake process sends an email indicating OSRAA was starting the review process of the award and asked for the PI to start their protocol, if appropriate. The contract officer accepted the award regardless of the proposal indicating IRB/IACUC.

After the award is accepted by the contract officer, the OSRAA Setup Coordinator sent an email to the PI and Business Center asking for a partial budget for an initial phase without human or animal subjects. If OSRAA was provided a partial budget, that portion was setup. If not provided, no index was established until an approved protocol was received.

New OSRAA Process for compliance setup holds with no specific sponsor hold requirement: New process starting Oct 22, 2019

If OSRAA receives an award with no special terms regarding IRB/IACUC protocols, the award will be accepted regardless of the proposal indicating IRB/IACUC. The award intake email will continue to notify the PI that it may be appropriate to start the protocol process as well as provide an opportunity to submit a partial budget (if desired).



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If OSRAA receives a partial budget, we will setup that partial budget. If OSRAA does not receive a partial budget, OSRAA setup coordinators will setup 50% of the budget (minus obvious protocol costs such as animal care and human subject incentives). The remaining 50% of the budget will be setup when the protocol is approved.