

OFFICE OF RESEARCH POLICY NON-COMPLIANCE RELATED TO SPONSORED AWARDS

Background and Purpose

Recipients of federal and other external funds must comply with all sponsor-imposed regulations, requirements, and policies. As the recipient organization, USC is required to ensure its compliance as well as that of its employees. This is accomplished by establishing internal controls and institutional policies that are implemented to place responsibility for compliance at the appropriate level (e.g. SAM, Controller's Office, academic departments, and individual employees).

Failure to comply with policies, external and internal, places the university as well as individual employees at risk of losing privileges connected with applying for and receiving external funding, particularly funds from federal agencies. External consequences of non-compliance can range from delayed funding of proposals to suspension from participating in federal funding programs. Non-compliance by an individual can jeopardize the entire university's eligibility to obtain funding; therefore, employees must adhere to requirements and expectations such as:

- submitting required project reports,
- filing complete disclosures related to external support and interests,
- providing true, complete, and accurate information on application documents,
- exercising fiscal responsibility related to budgeting, expenses, and reporting,
- assuring work environments are safe, free of discriminatory harassment and conducive to high-quality work,
- reporting accurately time and effort.

This policy aims to promote and further institutional compliance with the terms and conditions of sponsored awards by establishing procedures like those imposed by federal agencies to remedy persistent or repeated non-compliance with institutional or sponsor policies.

Procedure

If an employee intentionally or persistently fails to comply with the terms and conditions of a sponsored award or an associated institutional policy, the Vice President for Research reserves the right to take one or more enforcement actions including but not limited to:

- Suspending an individual's ability to submit proposals to external funding organizations. During the period of suspension, SAM will not process or approve proposals on which the offending individual serves as principal or co-principal investigator; and/or
- Withholding awarded funds (i.e. Project account is not established.)
- Reporting instances of non-compliance or policy violation to the appropriate external agency
- Recommending to the individual's direct supervisor a sanction as described in [ACAF 1.82 Faculty Progressive Discipline](#)

These actions only will be taken after reminders and offers of assistance are sent to the non-compliant employee(s).

Proposal submission privileges and access to funds will be reinstated upon corrective action by the suspended employee.

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Please contact the Office of Research or your SAM representative if you have any questions or concerns regarding this policy.