

Award Internal Approval Form

Instructions

IAF-A05

The *Award Internal Approval Form (IAF-A05)* provides a summary of pertinent administrative and fiscal information about a sponsored project for which a formal proposal was not submitted or for a gift/charitable contribution for which SIMS credit is desired. It also provides a record of assurances of Principal Investigator/Project Correspondent(s) or the Investigator(s) and campus, department, college, other academic unit Director(s), or other institutional approvals given to the Award being processed. An *IAF-A05* must be prepared and accompany all Awards sent to the Office of Sponsored Programs (OSP). The *IAF-A05* must have all required approvals prior to submission to OSP for further University processing and acceptance.

The *IAF-A05* is usually prepared with the assistance of a research administrator in the department, college, or other academic unit. However, it is the responsibility of the Principal Investigator/Project Correspondent(s) or Investigator(s) to provide accurate information and to make all the required assurances.

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1. The name of the Principal Investigator/Project Correspondent (PI) should be placed in this box. Only one name may be entered here. In those cases in which more than one individual is considered to be primarily responsible for the scientific, technical, and administrative conduct of a project, each person shall be considered a Co-Principal Investigator. However, only one investigator may be selected as the "Project Correspondent" and listed in box 1. The "Project Correspondent" is the person to whom official University communication will be sent regarding the Award. Approvals for the individual listed in box 1 should be given in the Single Investigator or Project correspondent Approvals section on page 2 of this form. Other Co-Principal Investigators should be listed on page 3 of this form, under the Additional Investigator Approvals section. In these cases, be sure to check the Investigator Status boxes as either "Co-Prin-

cipal Investigator" or "Investigator or Associate" Investigator(s)

2. Enter PI e-mail address.

3. The College/Unit having administrative responsibility for the project should be identified here. In the case of a consortium/ institute/ center, the VP for Research should be inserted. In the case of a Commonwealth Campus, enter "Commonwealth Campus" in this box as the College.

4. Enter College/Unit notification e-mail address.

5. The appropriate Department/Subunit for the PI in box 1 should be entered here, or in the case of a consortium/ institute/ center, the administering entity (*e.g.*, Materials Research Institute) should be identified. In the case of a Commonwealth Campus, the name of the Campus with administrative responsibility for the project should be identified here.

6. The type of project should be identified by checking **only one** of the boxes shown. Projects fulfilling more than one function should be **identified by the predominant activity** of the project. Below are some definitions that may be helpful:

Research - This box should be checked when the project predominantly involves *research, scholarship, and other creative endeavors*, such as research studies, research training, exhibits, performances, research dissemination, technology transfer, or economic development activities.

Instruction - This box should be checked when the project predominantly involves undergraduate or graduate instruction or instruction-related programs.

Outreach - This box should be checked when the project predominantly involves continuing education programs, either credit or non-credit, and

any activity that shall use continuing education program services or facilities, such as the Conference Center.

7. The title of the project should be entered here, exactly as it is listed on the Award.

8. If you can identify the **award type** that has been issued, please indicate here. The University has developed a number of acceptable formats for various types of sponsored programs. If one of those formats is used, please check the appropriate category under **University Generated Agreement**. If at the Award stage, it is not possible to forecast the type of award, leave this box blank. **A check mark, however, is not a binding commitment to a particular format of award.**

Gift/Charitable Contribution is defined as support for our PI to conduct departmental research per A-21. There are no intellectual property, publication, or funding restrictions or expected deliverables beyond an OUD stewardship report. Facilities and Administrative (F&A) charges do not apply. Payment must be received in advance to qualify as a gift/charitable contribution.

Unrestricted Grant is support for to conduct departmental research per A-21. There are no intellectual property, publication, or funding restrictions imposed. The maximum deliverable is to be a confirmation of use and purpose to the sponsor (stewardship report). Funding for unrestricted grants is restricted to \$50,000 per company, per PI, per fiscal year. Unrestricted grants will be assessed a 15% management fee.

Field Trial Grant is for use by the College of Agricultural Sciences to support their mission as Pennsylvania's Agricultural Experiment Station. This agreement should be used when companies provide agricultural products (seeds, pesticides, fertilizers, etc.) for testing. The results are then disseminated to Pennsylvania growers. The 15% management fee applies to these awards.

Research Grant is utilization of the "**Penn State University (PSU) Research Grant**" form (that has been developed to provide companies with a simple way to fund a University research project in a manner similar to federal grants).

The regular on-campus or off-campus research F&A rate applies to this award.

Program Grant is similar to a Research Grant except that the award is in support of a program.

Sponsored Research Agreement is in direct support of a specific research project. Sponsors are provided with a specific scope of work, specified technical reports and an option to license technology developed under the Agreement. The full F&A rate plus an additional 5% applies to this agreement.

Academic Research Services agreement provides support for measurement, composition, fabrication or analysis expertise. In essence, we are providing an "academic research service" to the Sponsor. The full F&A rate plus an additional 5% applies to this agreement.

Visiting Scientist award should be used when a Sponsor is sending an employee to PSU for an extended period of time to work with a Penn State faculty member or in a specific laboratory. The full F&A rate applies to this agreement.

Sponsor-Generated Agreements are awards from the National Institutes of Health, the National Science Foundation, and other granting agencies should be listed as a "**Grant**."

Cost Contracts are awards containing cost-reimbursement language.

Fixed Price Agreements are awards that are fixed-price or provide for a price per unit.

Cooperative Agreements apply to projects that include collaborative involvement and generally are issued by the governmental agencies, like USDA, USDI, and certain clinical trials with NIH.

Fellowship Awards are defined as financial support for a fellow or faculty member's tuition and stipends to complete or continue their degree(s).

9. If this *IAF-A05* is accompanying an Award that is being **renewed or continued**, insert the **current grant or contract number or PSU Accounting**

Information (University budget/fund number), so that OSP can match and link the document with the already existing university project. If the action is for a grant transferring from another institution, do not list the current number here, but do so with explanation in the *Remarks* section on Page 1 of the *IAF-A05*.

10. If the award type selected in Box 8 was “**Gift/Charitable Contribution**”, then this box will need to be completed. Include the total dollar of the gift/contribution amount from the sponsor and the time period the college has designated for the funds to be available to the PI for his general research project. A copy of the IAF-A05 form should be forwarded, with copy of the check and all sponsor correspondence, to the Office of University Development (OUD). The original should be sent to OSP. Documentation (letter from Sponsor) is always required if processing a gift/charitable contribution.

11. Enter the **complete identification of the Sponsor**, including a **contact person**. Enter the complete mailing address of the sponsor that the Award has been or needs to be transmitted to. Overnight courier services (except for U.S. Mail Express) *do not deliver to P.O. boxes*, so if overnight service is requested a delivery address, including accurate zip code must be given. If the Award is to be sent to multiple reviewers for the single sponsor (e.g., clearinghouse review, regional office review, and the like), then include a note to that effect in this box and include the other names, addresses, and mailing instructions in the *Remarks* section or on an attached sheet.

12. Insert the **CFDA (Catalog of Federal Domestic Assistance)** number. This number is required for all federal and federal flow-through Awards under OMB Circular A-133. The number is usually identified in the sponsor’s program guidelines. If it is not available, a call should be made to the sponsor contact point to obtain the number. If the Award is prepared in response to an RFP (Request for Awards), an RFQ (Request for Quotation), RFB (Request for Bid), BAA (Broad Agency Announcement) or other formal solicitation mechanism, identify the solicitation number. If the Award is submitted in response to a specific program opportunity, for example, NSF Young Investigator Awards, identify the name of the special program here.

13. If the award type selected in Box 8 was “**Gift/Charitable Contribution**”, then this box will need to be completed. Include the total amount of the gift/contribution from the sponsor and the time period the college has designated for the funds to be available to the PI for his general research project. A copy of the IAF-A05 form should be forwarded, with a copy of the check and all sponsor correspondence, to the Office of University Development (OUD). The original should be sent to OSP. Documentation (letter from Sponsor) is always required if processing a gift/charitable contribution. Boxes 15 through 20 of this form can be skipped. Please go to Page 2, “**Special Review Checklist**” to continue.

14. Identify the **initial period of the project**. This is normally the first year of the project, but in some circumstances may be a feasibility period of a just a few months or a fixed period of up to 18 months.

15. Identify the **total period of the project**. If this is the same as the initial period, type in “SAME” in this box.

16. Indicate the appropriate **F&A rates** that apply to the Award. (If no F&A is applicable check N/A.) In most instances, this will be the approved University rate, as negotiated with the Office of Naval Research, which acts as Penn State's cognizant agency on behalf of the U.S. Government. **In cases in which the government, a foundation, or other not-for-profit agency, as a matter of written policy, limits the amount of F&A cost recovery or uses a different base, indicate the applicable rates here and comment on them in the Remarks section. Attach a copy of the written policy to the IAF-A05.** Requests for use of F&A as cost sharing, in cases other than that mentioned directly above, must be formally submitted by writing a letter of request and justification to accompany the *IAF-A05* (see Item 22, below). All such approvals must be submitted well in advance of the deadline for the Award and approved by the Assistant Vice President for Research for research projects or the Controller's Office for other sponsored projects (See RA06 for further details on F&A costs).

17. Identify the **awarded amounts** for the period shown in Box 15.

18. Identify the **awarded amounts** for the period shown in Box 16. If this amount is the same as that in Box 18, type in "SAME" in this box.

19. Check the appropriate boxes to identify the source of **cost sharing**. Please note that certain types of cost sharing require the completion of additional forms. ***Clearance for institutional cost sharing or the use of F&A costs for cost sharing for Awards should be accomplished in advance of the submission of the IAF-A05 and Award to OSP, so that adequate time for review can be arranged with the appropriate office.*** Cost sharing coming from central university sources, for example a special equipment matching fund in the Provost's office, requires documentation which must accompany the *IAF-A05*. All use of F&A cost recovery for cost sharing outside of normal university policy must be documented by including a letter of request and justification with the *IAF-A05*. The University may not utilize F&A costs for cost sharing when dealing with *for-profit* companies or with foreign governments. (See OMB Circular A-21). In addition, the use of such funds as cost sharing might constitute the improper use of public funds to support a private or non-U.S. interest. Exceptions to the University's policy for the full recovery of F&A costs can be made in those cases in which the primary beneficiary of the waiver can be clearly documented as the University or the Commonwealth, rather than the company (such as in the case of gifts or unrestricted grants, the support of student research projects, or the support of state or regional governmental economic development projects). Please refer to Research Administrative Policies RA06, RAG10, and the "Funding Matrix" for further details on F&A recovery and cost sharing.

Remarks or Special Instructions Section

Indicate any items that require special attention or that can enhance the review process.

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This page does not require typewritten information. All information may be handwritten if in a clear, readable manner.

Special Review Checklist -- All boxes **must** be checked either yes or no.

Special Note: The Office for Research Protections (ORP) -- This Office coordinates review and approval of academic activities using human subjects, vertebrate animals, radioisotopes, and other biohazardous materials. Please refer to the University Policies (in GURU) RA14, RA15, and SY24. These policies should be used to determine whether the human subject, vertebrate animal, and biohazard boxes are checked "yes" or "no." Checking one of these boxes "yes" invokes the requirement for the PI to submit the material to appropriate offices or committees for review in accordance with each applicable University Policy or Guideline. Most public granting agencies require compliance documentation to accompany grant Award submissions, and approval by more than one office or committee may be necessary. Printed and electronic review request forms are available. More information may be obtained by calling the ORP at (814) 865-1775 or <http://www.research.psu.edu/orp>.

Human Research Participants (RA14) (requires specialized training) -- Federal regulations require that use of humans as subjects of research be reviewed by the Institutional Review Board (IRB). In general, if an activity involves any unusual risk to the subject, or if the results of an activity, including surveys such as questionnaires or interview data, are to be used in any form of publication or formal presentation, that activity should have prior IRB review.

Vertebrate Animal Use (RA15) -- All research using vertebrate animals conducted under the auspices of the University must receive a project approval number from the University's Institutional Animal Care and Use Committee (IACUC) prior to any animal involvement. Failure to obtain proper IACUC project approval may result in the suspension of privileges for the use of animal facilities controlled by the University.

Radioactive Materials -- The University Isotope Committee (UIC) reviews and makes recommendations for approval of all projects using radioactive materials at the University. UIC approval must be obtained prior to ordering any

radioactive materials. Arrangements for the receipt and delivery of all radioactive materials must be made through the Health Physics Office.

Continuing and Distance Education Programs (AD-3) -- All colleges, Subunits, and other academic units submitting Awards to conduct educational programs using the name of the University and/or University facilities must check this box "yes." OSP will coordinate the review of such Awards with the Office of the Vice President of Continuing and Distance Education.

International Programs -- The University's International Programs Office monitors and/or manages all international program activity at Penn State. Contact the International Programs Office as early as possible in the proposal development process. This is especially important when student or faculty exchanges are proposed, both of which have legal, liability, and visa implications.

Retired Faculty (RAG09) -- Retired faculty and staff can participate or continue to participate in sponsored projects on a compensated or uncompensated basis in appropriate circumstances. Completion of the appropriate agreement(s) is required prior to proposal submission.

HIPAA Covered Data Required -- The Health Insurance Portability and Accountability Act (HIPAA) of 1996, and its implementing regulations known as the "Privacy Rule," include provisions that protect the privacy of individually identifiable health information, and govern how health information is used and disclosed, including use and disclosure for research purposes. Use of Protected Health Information (PHI) in a research project must be approved by the ORP.

Recombinant DNA Techniques, Select Agents, Infectious Agents, Oncogenic Viruses, Carcinogens or Toxins used in conjunction with Animal Subjects (SY24) -- The Institutional Biosafety Committee (IBC) reviews proposals involving the use of certain biohazardous materials. Research involving recombinant DNA techniques, select agents, pathogens, oncogenic viruses or carcinogen or toxins applied to animal subjects must be reviewed and approved by the IBC. Researchers engaging in the described ac-

tivities must have their laboratories inspected by the University's Office of Environmental Health and Safety. Approvals are subsequently issued by the Office for Research Protections. Refer to Policy SY24.

Medical Surveillance or Biological Monitoring Required -- Certain research projects may necessitate medical surveillance or biological monitoring. Researchers requiring this service should contact the Director of the Occupational Health Program, University Health Services.

Subcontractors or Subrecipients are proposed -- The University has requirements under federal regulations to give proper management to all subcontractual relationships. Subcontracting is involved if the research project involves any entity outside of the University. Collaborations with fellow investigators at another institution (if these collaborations require payment of funds and are for more than the mere rendering of routine services which can be simply purchased) in which a portion of the research is to be accomplished by that fellow investigator at a non-Penn-State site, usually are accomplished via a subcontract (if the prime award is a contract) or a subaward (if the prime is federal assistant, *i.e.*, grant or cooperative agreement). Similarly, research that is to be performed by a private company as a part of a University project and paid for under a University grant or contract is to be arranged under a subcontract. Subcontracting procedures are governed by Federal regulations (OMB Circulars A-110 and A-133) which require the University to follow rigid standards for competitive or sole-source selection and for writing subcontracts. Subawards are also governed under A-110 and A-133, but require less rigid standards. Both, however, require the submission of a mini-Award by the subcontractor that becomes a part of our Award to the sponsor. This document should contain a scope of work for the subcontractor/collaborator, a corresponding budget, and a commitment by the subcontracting PI and an authorized official of the subcontractor or collaborator to perform the work at the budget specified. If an award is made, the subcontract or subaward will be negotiated with the other party by OSP. Projects which propose the construction or renovation of buildings or facilities are not considered subcontracts for the purposes of this requirement. All

contracting for construction and renovation must be given approval, prior to submission of the Award, by the Office of Physical Plant. Please refer to Research Administration Policies RA16 & RA19 for further information.

Sponsor is Foreign-Owned Company or Foreign Government (RA18) -- Contractual relationships with foreign entities may be regulated by certain federal laws governing the export of scientific knowledge or technology. They may also require special handling of intellectual property rights to ensure that federally sponsored research is properly managed in accordance with federal laws and policies. If the research project is with a foreign company or government, appropriate reviews and approvals must be obtained prior to commencing the research.

Research is Subject to Export Controls (ITAR / EAR) (RA18) -- U.S. laws govern the export of equipment, materials, service, or information that is controlled by the International Traffic in Arms Regulations (ITAR) and the Export Administration Regulations (EAR). University implementation of these regulations is in RA18 and RAG11. Export means not only the shipment of items outside the country, but also the transmission of certain information to foreign persons. Most university research, however, is exempted from these regulations because “fundamental research” performed at universities is excluded from controls. However, if publication restrictions are imposed in the sponsored agreement (whether the sponsor is the federal government, a private company, or any other entity) then the research no longer qualifies as “fundamental research” and is subject to the applicable export controls. In addition, if it is anticipated that the research will involve the shipment of hardware, software, or materials that are subject to export controls, then an export license will be required prior to the shipment of these items, regardless of whether the research itself is fundamental or not. If a research project is subject to export controls, then certain security steps must be put in place to ensure that a “deemed export” does not occur. This may mean getting licenses for certain foreign persons to work on the project or the exclusion of certain foreign persons. It may also mean that information may not be shared at international meetings. Failure to comply with

applicable export control laws can lead to severe sanctions and fines.

Human Embryonic/Fetal/Stem Cell Research (VP Signature Needed) -- If the research involves human embryonic research, fetal research, or stem cell research, the Award must be reviewed by the Office for Research Protections and approved by the Vice President for Research. Please contact OSP for further guidance and coordination on this proposed research activity.

Restrictions on the University/Investigator Publication or Intellectual Property Rights (freedom to publish) -- The *Penn State Faculty Handbook* states:

“Freedom to publish is essential to the fulfillment of the University's responsibility to disseminate the findings of research.

The University and the faculty work closely together to preserve this right in grants and contracts. In special circumstances, however, they may agree to restrict or delay publication. For instance, a delay in publication may be necessary in order to seek patent protection. In addition, publications involving new technologies or software may limit discussion to statements of new discoveries and interpretations of scientific facts and need not reveal specific information about processes or methods that are proprietary in nature. Papers describing discoveries often are withheld pending additional confirmations believed to be essential. In those exceptional cases in which researchers are involved in government-classified research (which is permitted only at the Applied Research Laboratory), publications are subject to the restrictions imposed by the federal government.

However, faculty must realize that publication restrictions beyond those needed to file for patent protection may negate the University's fundamental research exemption under U.S. export control laws, and thus could raise serious concerns regarding security restrictions and the involvement of graduate students in the covered research projects. Faculty should be very

cautious about any situation that might restrict the free dissemination of research results and should always consult with the office of the vice president for research prior to agreeing to any restrictions. " Publication rights are an important and essential element of Academic Freedom. As is cited in the *Penn State Faculty Guide to Sponsored Programs*, "Penn State is deeply committed to academic freedom, not only for the sake of the faculty, but for those we serve as well. Ultimately, academic freedom is crucial to our society, for it affords the individual faculty member the opportunity to remain uncommitted to a particular course of action or end result, thus ensuring accurate, objective, and unbiased results."

It is also important to ensure that freedom to publish is preserved in sponsored projects in order to maintain our status as a tax-exempt entity. What distinguishes us from businesses that do research is our mission to disseminate that information for the public good. To accept, without extraordinary justification, restrictions on publication could jeopardize our tax-exempt status. Finally, if publication restrictions are placed on a sponsored project, the research conducted thereunder may be subject to U.S. export controls, since the research no longer would be considered "fundamental" under federal regulations. [See also previous item "Research is subject to Export Controls (ITAR/EAR) (RA18)"].

Or, Restrictions on University's Intellectual Property Rights -- The University retains ownership to intellectual property developed by University faculty on research projects. The University recognizes, however, the importance of transferring that technology to the commercial sector where it can benefit the people it serves. Therefore, the University usually grants sponsors the first option to negotiate a license for technologies developed under the project. In some cases, certain deliverables (such as reports, raw data, charts and graphs, etc.) may be given over to the sponsor's ownership, as long as the University retains rights to publish on the scientific aspects of the research performed and retain copyright to those publications. Generally

in doing federally sponsored research, a non-exclusive, royalty-free license is made to the government for its own use. University intellectual property rights must be negotiated by OSP, in conjunction with the University's Intellectual Property Office.

Commitment of University / Investigator Intellectual Property or "Background" Rights --

Certain projects may carry the potential for committing University intellectual property rights to the sponsor. For instance, the solution to a particular sponsor's problem may involve the adaptation of technology that has already been developed by Penn State. The use of such pre-existing technology would require the licensing of "background" rights. It is important to identify such potential as early as possible so that the Intellectual Property Office can review the situation to determine how best to protect the University's and Investigator's proprietary position. Please refer to Research Administration Policy RA11 for further information.

Company Confidential Information will be provided to University -

Certain collaborative research activities have the potential for the transfer of company proprietary or confidential information to University investigators. Normally such transfers require a Confidential Disclosure Agreement (CDA). CDAs must be reviewed and approved by the Penn State Intellectual Property Office and executed by an authorized University Official. They may not be signed by faculty. These agreements put restrictions on the University's use of proprietary or confidential information, including some limitation on publication rights and the granting of review rights to the company of any publications prior to submission. Handling restrictions may also be placed on the research labs, *i.e.*, locked file cabinets and proper security measures may be required for the confidential information.

Security classification will be imposed -

Under unusual circumstances when the University is uniquely qualified to provide, in the best interests of the country, a certain kind of research, the University will accept classified research projects. These research projects may only be conducted in a federally-approved security facility. All classified research at Penn State must be accomplished through the Applied Research

Laboratory (ARL). It must receive formal approval from the University President prior to submission. Investigators will be required to obtain government security clearance prior to starting work on the project. If this box is checked yes it invokes ARL processing of the Award and will be forwarded or should be submitted through the ARL Business Office. Please call OSP for further information and guidance if needed.

Technical Data & Computer Software Restrictions – If certain restrictions are placed on the University regarding ownership of materials developed on a project (for instance if FAR clauses 252.227-7013 or -7014 are included), then a special review is needed to determine if special proprietary markings are required to be placed or have been placed on the Award.

Disclosure & Assurances Section

YES/NO - Principal Investigator/ Project Correspondent(s) and Investigator(s) Review and Understanding of “Special Review Checklist”

-As a result of federal regulations and increasing pressures and mandates from the U.S. Congress, the University must require that persons submitting Awards for funding (including all investigators and other key faculty and staff who will be working on the project) make certain assurances regarding the submission of the Award and the conduct of the project, if awarded. In addition, the University has certain requirements which must be met for which assurance is required. ***Awards will not be processed without the required signatures.*** In certain circumstance when an investigator is away from the University, someone may initial or sign for the investigator, as long as documentation is provided (such as emails or faxes) verifying the personal assurances of the investigator.

YES/NO – Gift/Contribution Assurance

-If this award is categorized as a gift/contribution or unrestricted grant, I will not provide the donor

with any deliverable research results that have not been published or placed in the public domain, nor disclose or transfer to the donor any technology or Intellectual Property developed under these funds without the approval of the University Intellectual Property Office.

YES/NO - Conflict of Interest Disclosure

- It is vitally important that the University and its researchers maintain their reputations for the *unbiased* conduct of scientific investigation and pursuit of knowledge. Thus, in accordance with Federal regulations, the Principal Investigator/Project Correspondent is required to certify that all investigators have reviewed Penn State’s **Conflict of Interest and Investigator Significant Financial Interest Disclosure Policies (HR91, RA05, RA12, RA20, and RA21)** identified on the *IAF-A05* and have read and completed the Significant Financial Interest Disclosure Form, pages 5-6 of the *IAF-A05* if this box is checked yes. By Federal regulation, all conflicts must be disclosed **PRIOR TO THE SUBMISSION OF AWARDS** and resolved prior to expenditure of funds. University policy (PS 91) requires that *“faculty and staff members shall disclose to the administrative head of the college or other unit in which they are employed, any potential conflict of interest of which they are aware, before a contract or transaction is consummated.”* Initialing this box in the Approvals Section of the *IAF-A05* will serve as partial fulfillment of that obligation. A University policy statement, adopted by the Board of Trustees in July of 1990, further helps to explain conflict of interest in terms of sponsored research: "

Universities conduct research for the purpose of generating new knowledge. The potential for conflict of interest and/or commitment exists when faculty researchers exercise preferential access to knowledge, and/or University resources, for personal gain. The appropriate framework for faculty involvement in enterprises, either commercial or not-for-profit, has to be evaluated on a case-by-case basis in concert with Deans, Department Heads, Program and Center directors, Office directors, etc. ("cognizant

University administrators"). ...As a rule, there should be a clean demarcation of both effort and incentive between faculty duties and those activities associated with involvement in personal enterprises."

Faculty should familiarize themselves with current University and Federal policies governing conflict of interest. Full disclosure of any potential conflict of interest is a faculty member's best protection against real or perceived conflicts of interest. Some activities may require, under University policy, the formulation of a *Memo-randum of Understanding (MOU)* to spell out limitations that may be placed upon a project to manage conflicts.

YES/NO – Integrity of Research

- Checking this box yes indicates that the proposal submitted herewith is complete in its technical content, adheres to the rules of proper scholarship, including specifically the proper attribution and citation for all text and graphics, complies with federal standards for the integrity of research (*e.g.*, NSF Misconduct in Science Policy, see Research Administrative Policy RA10), and is in accordance with specifications established by the sponsoring agency.

YES/NO – Facilities/Space

- Certain proposal submissions require additional University facilities and space to conduct the proposed research. Checking "yes" to this assurance indicates that provisions have been arranged with department/college/unit to make such space or other University resources available in the event an award is made.

YES/NO - Federal Representations, Certifications, and Assurances

- Certain Award submissions require the assurance of the Investigator(s) or Principal Investigator/Project Correspondent that Federal or Principal regulations or laws will be complied with. These are identified on the *IAF-A05- Federal Assurance Page 5*.

Principal Investigator/Project Correspondent(s) or the Investigator(s) Assurances

- Federal scrutiny of Awards has been magnified lately because of increasing Congressional pressures and mandates. As a result, federal agencies have adopted assurances or compliance requirements that must be completed by Principal Investigator/Project Correspondent(s) or the Investigator(s) prior to Award submission. These assurances are summarized here and signed off for by the Principal Investigator/Project Correspondent(s) or the Investigator(s) as a record to be maintained by the University. In addition, the University also seeks assurances from Investigators or Principal Investigator/Project Correspondents that their Awards have been prepared to meet Federal standards and requirements, that they comply with generally accepted rules of proper scholarship, that the Investigator has the resources to conduct the proposed project or that appropriate arrangements have been made with departments, colleges, or other academic units for such resources, and that the Investigator or Principal Investigator/Project Correspondent will carry out the requirements of the grant or contract if an award is made and accepted by the University. The Office of Research Integrity of the Public Health Service has issued a list of integrity issues that investigators should consider as further explication of the assurance regarding federal standards for the integrity of research. These are:

- Data and other research products produced under this grant will be maintained in a central location and will be kept in a manner that will allow other qualified scientists to verify the accuracy and integrity of reported results of the research;
- Individuals supported in whole or in part by this grant and who are in training status will be given explicit training in the responsible conduct of research;
- Any individual who has a substantive scientific role in the proposed research has been provided a copy of the grant application and has had an opportunity to comment on it;

- Criteria for authorship of publications resulting from the proposed research have been discussed and agreed to by the professional staff of the laboratory;
- Scientists who have a substantive scientific role in the proposed research do not have any financial interests that could affect the objectivity of the research;
- Any material in the grant application which is a verbatim reproduction of other persons' writing has been identified by quotation marks and properly attributed;
- The principal investigator has reviewed for accuracy and integrity any data presented in the application that have been provided by others.

Approvals Section

Approvals for a single investigator or the Project Correspondent on multiple investigator projects are given in the first approvals section. If the Investigator/Project Correspondent is from a Commonwealth Campus, then a signature from the Campus Chancellor must be given. Department heads, unit directors, deans, or the authorized representatives of these officials must show their approval of the Award or award document by signing the appropriate boxes. Final University authorization is obtained by OSP. All Co-Principal Investigators, Investigators, Faculty Associates, and other individuals, for which concurrence of other departments, colleges, or other academic units is required, must be listed as additional investigators and appropriate approvals obtained. Use the IAF-A05 - Additional Approvals Page 3 for Co-Principal Investigators, Investigators, Faculty Associates and other individuals. All investigators make the same assurances listed on Page 2 of the IAF-A05 and on the Federal Assurances Page 5. Additional investigators must indicate by initialing the proper box whether or not the project represents the potential for a conflict of interest as stated on previously and on page 2 of the IAF-A05.