Information Session

PI Roles and Responsibilities

Cheryl Dykstra-Aiello, Ph.D., Research Development Specialist, Office of Research Advancement and Partnerships

Levi O’Loughlin, Research Safety Program Associate Director & University Biosafety Officer, Office of Research Assurances
Thank you for coming!

Join us for more information sessions and events:

3/20 at 12pm – Leveraging the Power of Extension in Community Engaged Research
Learn about best practices to engage with community-based Extension faculty to leverage your work across Washington State.

3/27 at 5pm – Interdisciplinary Dialogue: Borders and Bridges
Three presenters from various areas in the Arts and Humanities will briefly share their approach to research, scholarship, and/or creative activity on the theme "Borders and Bridges".

4/10 at 5pm – Arts and Humanities Showcase
This showcase will highlight the research, scholarship, and creative production of WSU faculty in the Arts and Humanities.

orap.wsu.edu/events
Role of the Principal Investigator

• Managing a sponsored project award is a shared responsibility.

• However, the Principal Investigator has **primary responsibility** for achieving the technical success of the project, while complying with the financial and administrative policies and regulations associated with the award.

• Although the Principal Investigator may have administrative staff to assist them with the management of various aspects of the project, the **responsibility** for the management of the sponsored project award rests with the Principal Investigator.
I thought you said this was a *shared* responsibility?
Research Administration Process
Roles and Responsibilities

1) Identification of Funding Opportunities
2) Proposal Preparation
3) Proposal Review and Approval
4) Proposal Submission
5) Award Acceptance
6) Award Set-Up*
7) Subrecipient Monitoring
8) Award Management & Maintenance
9) Program Income
10) Invoicing & Billing for all Sponsors
11) Accounts Receivable & Cash Mgmt.
12) Preparation and Submission of Financial Status Reports
13) Preparation and Submission of all Technical Reports
14) Certification of Time and Effort
15) Closing of Accounts
16) Single Audit and Agency Reviews
17) Retrieval of Federal, Sponsor, and University Policy/Regulations
18) Ongoing Training
19) Compliance Issues
Roles and Responsibilities

Research administration process

Roles and responsibilities
The Office of Research Support and Operations teams with other University entities to administer sponsored proposals and awards and to ensure regulatory compliance.

Charts below identify the individual(s) or unit(s) responsible at each stage in the research administration process. Please note that some colleges offer similar services; check with your unit and area for other resources that may be available.

Individuals & units involved in research administration
- Principal Investigator (PI)
- Academic department and chair
- Dean, chancellor, or vice president
- Office of Research Support and Operations (ORSO)
- Office of Research Advancement and Partnerships (ORAP)
- Sponsored Programs Services (SPS)
- Office of Research Assurances (ORA)

Preparation and submission of all technical reports

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<thead>
<tr>
<th></th>
<th>ORSO</th>
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<th>PI</th>
<th>DEPT</th>
<th>DEAN</th>
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<tbody>
<tr>
<td>Identify the need for submission of a technical report</td>
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<td>Prepare and approve technical reports</td>
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<td>Submit technical reports to sponsor</td>
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<td>Maintain and track the submission dates of the official copy of the technical report</td>
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https://orso.wsu.edu/research-administration-process/
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Roles and Responsibilities

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4. When negotiating the terms and conditions of an award, the ORSO representative should be in frequent discussion with the PI to ensure that the PI is aware of the changes being made. The ORSO representative will ensure that the PI is in agreement with necessary changes.
Common Regulations & Policies for Sponsored Project

- Revised Code of Washington (RCW; Title 28B)
- Washington Administrative Code
- WSU Business Policies & Procedures Manual (BPPM)
- WSU Executive Policy Manual
- WSU Faculty Manual
Award Review and Acceptance

• Only an authorized signatory may sign and accept a sponsored project award on behalf of the University.

• ORSO authorized signatories:
  • Dan Nordquist, Deputy Vice President for Research
  • Matt Michener, Assistant Director

• Common problematic contract clauses:
  • Contracting limitations as a state agency;
  • Confidentiality;
  • Liability issues;
  • Intellectual property and technology transfer;
  • Data rights and security obligations; and
  • Publication restrictions.

If you personally sign an award, and do not have authority to do so, you may be individually liable for any resulting damages.
Industry Contracting Vehicles

- **Sponsored Project Agreement (SPA)**
  - Set of standard terms and conditions frequently utilized by the university;
  - Full Facilities & Administration (F&A) costs apply; and
  - WSU retains ownership of the intellectual property (IP) developed, but industry partner has access to results and may obtain license option.

- **Broad Industry Project Agreement (BIPA)**
  - Simple, non-negotiable 1-page agreement provides a partner access to results of the work, but no option for IP rights;
  - No F&A charges, although projects incur a 10% project fee, of which 50% returns to the lab of the lead faculty; and
  - Maximum of $40,000 for the project.

- **Contracting Acceleration Program (CAP)**
  - The CAP allows industry sponsors and WSU researchers to choose from a variety of up-front licensing options for intellectual property resulting from sponsored research projects. CAP agreements work best for highly applied projects in which the expected outcomes specifically benefit a sponsor or improve/refine a sponsor’s product or offering.
Common Non-monetary Agreements

These agreements are not usually part of award acceptance, but they may be necessary to facilitate a sponsored project.

- Non-Disclosure Agreements (NDA)
- Material Transfer Agreements (MTA)
- Teaming Agreements
- Data Use Agreements (DUA)
- Data Management Agreement
- Memorandums of Understanding (MOU)
- Facility Use Agreements (FUA)
- Intellectual Property Management Plans
- Equipment Loan Agreements

Email orso@wsu.edu for more information.

Templates at https://orso.wsu.edu/forms-templates.
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# Award Set-up Matrix

## Award set-up

<table>
<thead>
<tr>
<th>Activity</th>
<th>ORSO</th>
<th>ORAP</th>
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<th>PI</th>
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<th>DEAN/VP/CH</th>
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<tr>
<td>Record award information for tracking</td>
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<td>Prepare award summary documents</td>
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<td>Establish accounts in central data base and code accounts for budget</td>
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<td>allocations, funding mechanisms facilities and administrative (F&amp;A) costs,</td>
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<td>and other fiscal-related codes</td>
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<td>Activate account number</td>
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<td>Upload budget to budgetary ledger</td>
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Also see WSU BPPM 40.07: [Research or Conference Account Request](#)

**Sponsored Program Services** (SPS) is principally responsible for this process, but ORSO is working on improving its practices and procedures to help reduce administrative burden on SPS.
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### Subcontracts/subrecipient monitoring

<table>
<thead>
<tr>
<th>SEE NOTE 10</th>
<th>ORSO</th>
<th>ORAP</th>
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<th>SPS</th>
<th>PI</th>
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<th>DEAN/VP/CH</th>
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<tbody>
<tr>
<td>Obtain proposal documents (SOW, budget, Letter of Support, etc.), from subrecipient and review for applicability at proposal stage</td>
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<td>Prepare and submit subaward initiation sheet and proposal documents to ORSO once prime award is funded</td>
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<td>Review and verify subaward initiation sheet and proposal documents</td>
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<tr>
<td>Run Visual Compliance check and initial financial risk assessment on subrecipient organization and PI</td>
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<td>Draft and negotiate subcontract agreement, including incorporation of applicable Attachments</td>
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<td>Review completed subcontract and translate into WSU post-award systems</td>
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<td>Annually review the subcontractor’s most current audit document, monitor for risk and follow up on any findings</td>
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<td>Process and approve subcontract invoices for payment, including review for allowability</td>
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<td>Review technical/progress reports to ensure progress is sufficient</td>
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<td>Submit copy of property, invention and cost-share reports to SPS</td>
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<td>Assist with desk reviews and/or site visits</td>
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</tbody>
</table>

10. ORSO, SPS, the Department and the PI all share the primary responsibility for the monitoring of subrecipients. The Department assists the PI with this task hands-on, and ORSO and SPS ensure that the University’s subrecipient monitoring procedures are compliant.
Subrecipient Set-up

• Work with your research administrator to prepare and submit the subaward initiation sheet and a copy of the proposal documents to ORSO once the prime award is funded.

• Facilitate communication between ORSO and the subrecipient principal investigator or grants office.

Subawards and subcontracts
• Subaward subcontracts
  - Initiation form for a new subaward/subcontract (.pdf)
    Use this form only if a new subaward or subcontract is to be issued. See ORSO Guideline 7 for information.
  - Subaward/subcontract change request form (web based)
    For requesting a change to an existing subaward or subcontract
  - Subrecipient invoice (fillable) (.xlsx)
    Sample invoice provided to recipients of subawards/subcontracts
  - Subrecipient ECOI form 1 (For PHS/DOE/NSF ECOI Regulated Projects) (.pdf)
    To determine if a subrecipient has a PHS/DOE/NSF compliant ECOI policy
  - Subrecipient investigator SFI disclosure form 2 (For PHS/DOE/NSF ECOI Regulated Projects) (.pdf)
    Disclosure Form for those adopting WSU's ECOI policy
  - Subrecipient RCR form 1 (.pdf)
    To determine if a subrecipient has RCR compliant policy
  - WSU subrecipient monitoring plan (.pdf)
    Processes and responsibilities before and after a subaward or subcontract is initiated
  - Sub-Recipient questionnaire form (.doc)
    Used to complete some WSU risk analysis reviews
  - Directions for WSU Affiliates or Non-WSU Researchers taking the CITI ECOI Training
  - Subaward department checklist (optional)
Subrecipient Monitoring

- Monitoring the subrecipient is a federal regulatory requirement (see CFR 200.332)
- Review subrecipient progress on tasks – may want to consider site visits in appropriate circumstances.
- Review and approve progress and final reports.
- Review and approve invoices – work with your research administrator and SPS.
- Work with ORSO on changes to sub-award terms and conditions, e.g., time extensions, change of scope, re-budgeting.
  - In the event of a de-obligation, communicate with the subrecipient PI in advance of the change.

ORSO Guideline 7
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<table>
<thead>
<tr>
<th>Description</th>
<th>ORSG</th>
<th>ORAP</th>
<th>ORA</th>
<th>SPS</th>
<th>PI</th>
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<tbody>
<tr>
<td>Develops an overall plan for the commitment of grant and contract funds,</td>
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<td>working with the authorized person(s) in the department, college, or</td>
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<td>newer campus, and consults other University officers as appropriate.</td>
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<td>Establishes systematic procedures in the department, college, or newer</td>
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<td>campus for supervision of grant and contract accounts.</td>
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<td>Provides administrative support for the management of grant or contract</td>
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<td>accounts. Offer, this responsibility is delegated to the departmental</td>
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<td>manager, fiscal officer, administrative assistant, or other administrative</td>
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<td>Fiscal administration for grants and/or contracts, cooperative agreements,</td>
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<td>sub-contracts, and financial assistance agreements negotiated with</td>
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<td>federal, state, and private sponsors at the central level.</td>
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<td>Track carryforward and any sponsor requirements to utilize in future</td>
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<td>budget periods.</td>
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<td>Maintain central internal systems for monitoring status of all sponsored</td>
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<td>projects, for receivables, overdrafts, revenue, effort certification, cost</td>
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<td>sharing, letters of credit, electronic funding, and financial reporting</td>
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<tr>
<td>Approves all expenditures requests to be charged against the grant or</td>
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<td>contract account.</td>
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<td>Review and approve expenditures for allowability and allocability.</td>
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<td>Oversee expenditures for allowability and allocability. (see note 13)</td>
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<td>Review and submit agency appointment documents</td>
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<td>Reconcile accounts on a monthly basis</td>
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<td>Periodically notify departments of overdraft accounts</td>
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<td>Produce exceptions report and contacts department</td>
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<td>Resolve issues on the exception report</td>
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<td>Oversee the resolution of items on the exception report</td>
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<td>Also see WSU BPMM 40.08: Fiscal Responsibilities for Sponsored Projects</td>
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<td>Also see WSU BPMM 40.12: Acquiring Equipment Under Federal</td>
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<td>Agreements</td>
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<tr>
<td>Also see WSU BPMM 40.13: Management of Equipment Acquired Under Federal</td>
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<tr>
<td>Also see WSU BPMM 40.16: Transferring Research Equipment to Other Institutions</td>
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<td>Also see WSU BPMM 40.27: Fixed Price Agreements</td>
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<tr>
<td>Also see WSU BPMM 45.35: Managing Research Records</td>
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Award Management

- Develop, design, and conduct the research program.
- Complete and submit all technical reports.
- Complete and submit necessary continuation and renewal proposals.
- Work with your research administrator and SPS to submit financial reports.
- If award modifications are required, work with departmental research administrator and ORSO.
- Oversee project management, with delegation for day-to-day operations as appropriate, with adequate controls.
- Disseminate research results, i.e., publications, poster-sessions, presentations.
Award Management (cont’d)

- Training of undergraduate and graduate students, post-docs and staff, including applicable responsible conduct of research training (NSF, NIH, and USDA).
- Responsible for safe and ethical conduct of research per university policies and federal regulatory laws (CITI).
- Comply with shipping requirements for infectious substances, diagnostic specimens, and recombinant DNA molecules.
- Maintain training in appropriate microbiological, safety and clinical practices.
- Ensure employees know about relevant terms and conditions of the award, such as NDAs, MTAs, deliverables, etc.
Research Administration Process
Roles and Responsibilities

1) Identification of Funding Opportunities
2) Proposal Preparation
3) Proposal Review and Approval
4) Proposal Submission
5) Award Acceptance
6) Award Set-Up*
7) Subrecipient Monitoring
8) Award Management & Maintenance
9) Program Income
10) Invoicing & Billing for all Sponsors
11) Accounts Receivable & Cash Mgmt.
12) Preparation and Submission of Financial Status Reports
13) Preparation and Submission of all Technical Reports
14) Certification of Time and Effort
15) Closing of Accounts
16) Single Audit and Agency Reviews
17) Retrieval of Federal, Sponsor, and University Policy/Regulations
18) Ongoing Training
19) Compliance Issues
Office of Research Assurances (ORA) Fosters Responsible Research Practices

Compliance is a broad range of activity including general guidelines for conducting research responsibly to specific regulations governing certain types of research.

Presidential Committees
- Institutional Animal Care and Use Committee (IACUC)
- Institutional Biosafety Committee (IBC)
- Institutional Review Board (IRB)
- Radiation Safety Committee (RSC)

Research Services
- Export Controls
- Hazardous Materials Shipping (HMS)
- Responsible Conduct of Research (RCR)

• Other compliance-related resources:
  - Environmental Health and Safety – each campus (e.g., Chemical Hygiene Plan, SDS)
  - Technology Transfer – Office of Commercialization
  - Financial Conflict of Interest – Office of Research and Support Operations
  - Research Misconduct (RM) – Office of Research
  - Human Resources and Equal Opportunity – HRS / Office of Compliance & Civil Rights
  - Open Government and Public Records – Public Records Office
Animal Welfare Program (AWP)
Institutional Animal Care and Use Committee (IACUC)

The Animal Welfare Program supports the IACUC which provides oversight of research, teaching, and clinical educational activities that involve animals.

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https://iacuc.wsu.edu
Human Research Protection Program (HRPP) 
Institutional Review Board (IRB)

The HRPP supports the IRB in ensuring that all human subjects research is conducted ethically by requiring that appropriate informed consent is sought and documented, that risks to subjects are minimized and that the risks are reasonable in relation to the potential benefits. In doing so the HRPP and IRB ensure the protection of the health, welfare, safety, rights and privileges of participants.

https://irb.wsu.edu

Respect for Persons  Beneficence  Justice
Research Safety Program (RSP)

Institutional Biosafety Committee (IBC)

Radiation Safety Committee (RSC)

Export Controls

Hazardous Materials Shipping (HMS)

Responsible Conduct of Research (RCR)

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Institutional Biosafety Committee (IBC)

- Since WSU receives NIH support, any research conducted at WSU involving recombinant or synthetic nucleic acid molecules must comply with the NIH guidelines.
  - “On behalf of the institution, the Principal Investigator is responsible for full compliance with the NIH guidelines in the conduct of recombinant or synthetic nucleic acid molecule research.” NIH Guidelines, Section IV-B-7, April 2016
- Investigators must register with the IBC before conducting any research (regardless of the funding source) involving r/sNA molecules, human fluids or tissues, or other infectious agents involving potentially biohazardous materials.
- https://biosafety.wsu.edu

The IBC verifies containment practices & facilities
Hazardous Materials Shipping (HMS)

Is my shipment (potentially) hazardous?

- Dry Ice
- Laboratory Chemicals (including preservatives)
- Pathogens
- Animal or Human specimens
- Compressed gas cylinders
- Lithium Batteries (in & out of equipment)
- GMO’s
- Radioactive materials

If your material is hazardous or you are not sure please call:

ORA Hazmat Shipping 509-432-3869

ora.wsu.edu/what-is-a-hazardous-material
Export Controls

- Export controls are a complex set of federal regulations that govern the release of certain commodities, technologies, and software to foreign nationals in the United States and abroad. These controls are in place to promote national security, foreign policy, anti-terrorism, and non-proliferation.
  - It is the PI’s responsibility to be aware of the requirements under these regulations.
  - **When to think about export control:** Will you be shipping or electronically transmitting any material or technical data out of the US or collaborating with foreign persons or entities? Are you traveling with your laptop?
- [https://ora.wsu.edu/export-controls](https://ora.wsu.edu/export-controls)
  - CITI Training
National security agencies, federal granting agencies, the White House, and members of Congress have all signaled their increasing concern about systematic programs of foreign interference and misappropriation of intellectual property at U.S. research universities.

Washington State University encourages all members of the WSU community to ensure that their international collaborations and global engagement activities are both transparent and in full compliance with relevant policies and regulations.

PI’s need to be aware that disclosure of foreign support is an ongoing obligation.

https://orso.wsu.edu/foreign-influence-on-federally-sponsored-research-guidance/
The PI tech transfer responsibilities:

- Submit an invention disclosure to the WSU Office of Commercialization (OC) BEFORE any public presentation of the research including publications, poster presentations, thesis, and conferences.
- Preserve & maintains primary data related to inventions.
- Secure an outgoing Material Transfer Agreement prior to transfer of research-related materials to outside collaborators.
- Complete the invention portion of continuing grant applications and the Final Invention Report.

- [https://commercialization.wsu.edu](https://commercialization.wsu.edu)
- Chapter 35 of the Business Policies and Procedures Manual [https://policies.wsu.edu/prf/index/manuals/35-00-contents](https://policies.wsu.edu/prf/index/manuals/35-00-contents)
- Sections F (Intellectual Property), G (Patent Policy) and H (Copyright Policy) of the [Faculty Manual](https://policies.wsu.edu/prf/index/manuals/35-00-contents)
Radiation Safety

• The Radiation Safety Program works to minimize radiation exposure to WSU personnel and provide necessary services to users of radioactive materials and radiation machines.

• The PI is responsible for:
  • Disclosure of use of radioactive materials on the eREX
  • Following the safety procedures for radioactive materials. See: https://rso.wsu.edu/rppm/

• https://rso.wsu.edu
Environmental Health and Safety

- PI responsibilities include maintaining materials handling, safety, and standard operating procedures; equipment safety and maintenance; internal and external inspections; and supervising staff, students, and post-docs to ensure that required health and safety training, reporting, and communication occurs.

- WSU Environmental Health & Safety provides consultation and services in the areas of chemical waste management, laboratory safety (including chemical safety), public health, air and water quality, and worker health and safety. [https://ehs.wsu.edu](https://ehs.wsu.edu)

- Oversee occupational health, environmental services, public health, and sustainability.
Investigators must disclose their Significant Financial Interests (SFI’s) through MyResearch:

1. When submitting a proposal to HHS (or agencies that follow the PHS FCOI rules).
2. When the COI box is checked on the eREX Form
3. When a new SFI is discovered or acquired
4. Annually (when required by sponsor)
5. When travel is reimbursed or sponsored

Investigators must report any changes to financial relationships affecting research.

- https://research.wsu.edu/resources-researchers/operations-support/coi
- https://research.wsu.edu/documents/2018/01/faculty-quick-guide-for-conflicts-of-interest.docx
Responsible Conduct of Research

RCR training is available on MyResearch for Faculty, staff, & students (anyone credited on a grant must have current training).

Retraining is required every 5 years, which covers:

1. Data Acquisition, Management, Sharing and Ownership
2. Use of Humans
3. Conflict of Interest and Commitment
4. Use of Animals
5. Research Misconduct
6. Publishing Practices and Authorship
7. Mentor/Trainee Relationships and Responsibilities
8. Peer Review
9. Collaborations

myresearch.wsu.edu
Research Misconduct (RM)

- Fabrication is making up data or results and recording or reporting them.
- Falsification is manipulating research materials, equipment, or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.
- Plagiarism is the appropriation of another person’s ideas, processes, results, or words without giving appropriate credit.
- Serious deviation from accepted practices, includes but is not limited to:
  - Abusing confidentiality, including the use of ideas and preliminary data gained from:
    - Access to privileged information through the opportunity for editorial review of manuscripts submitted to journals; and
    - Peer review of proposals being considered for funding by agency panels or by internal committees, such as the Institutional Review Board (IRB), the Institutional Animal Care and Use Committee (IACUC), and the University Research Grants Committee.
  - Stealing, destroying, or damaging the research property of others with the intent to alter the research record; and
  - Directing, encouraging, or knowingly allowing others to engage in fabrication, falsification, or plagiarism.

https://research.wsu.edu/office-research/research-misconduct/
Human Resources/Equal Opportunity/Discrimination and Harassment

- Trainings - [https://hrs.wsu.edu/training/](https://hrs.wsu.edu/training/)

- Incident Reporting: WSU employees with supervisory responsibility must report all incidents of discrimination and discriminatory harassment to the CCR Office, including incidents that do not involve sexual harassment or sexual misconduct.

- Areas of compliance include:
  - Equal employment opportunity and affirmative action
  - Americans with Disabilities Act
  - Title IX: No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving federal financial assistance.

- [https://ccr.wsu.edu/](https://ccr.wsu.edu/)
Open Government:

"Government accountability means that public officials — elected and un-elected — have an obligation to explain their decisions and actions to the citizens. Government accountability is achieved through the use of a variety of mechanisms — political, legal and administrative — designed to prevent corruption and ensure that public officials remain answerable and accessible to the people they serve. In the absence of such mechanisms, corruption may thrive."

Thus, all data including communication is the property of the state and therefore the residents have a legal right to review Public Records (e.g., hard drives, emails, texts, voicemails, notes)

State Ethics:

Addresses conflicts of interest, improper use of state resources, compensation for outside activities, and gifts.

https://public-records.wsu.edu/
Questions?