

# SFSU Compliance Program

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Compliance Officer  
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San Francisco State University



- A culture of compliance begins with a culture of understanding
- An effective culture of compliance must be established from the TOP and be an institutional expectation

# Why do we need a research compliance program?

- Sponsored programs are a significant activity at SFSU (\$59M in FY 05-06)
- Research administration is highly complex, yet not consistently managed
- Research administration is not well understood by the university community

# Why do we need to monitor research?

- Federal Regulations
  - Increased scrutiny, regulations
- Protection of the Faculty and University
  - Monitoring of cost-share commitments
  - Time and effort reporting
  - Sub-recipient monitoring
  - Appropriate cost-transfers
- Fiscal Responsibility and Oversight

# Components of an Effective Compliance Program

- Written Policies and Procedures
- Compliance Officer and Committee
- Training Programs
- Open lines of communication
- Auditing and Monitoring
- Disciplinary Action and Accountability
- Response to Problems
- Clearly Defined Roles and Responsibilities

## Compliance Officer

- Reports to the Provost through the AVP of Academic Affairs
- Manages the daily operation of the sponsored research Compliance Program
- Provides training to faculty and staff on compliance related issues

## Compliance Committee

- Oversees the Compliance Program throughout SFSU
- Chaired by the Provost, member of President's Cabinet
- Reviews and considers reports from the Compliance Officer and Internal Auditor

SAN FRANCISCO STATE UNIVERSITY  
Office of Research and Sponsored Programs  
TIME AND EFFORT REPORT

| Faculty Information   | Effort Information   |
|---|--|
| <p><i>Faculty Name:</i> Jane Smith<br/><i>College:</i> Science and Engineering<br/><i>Department:</i> Mathematics</p> | <p><i>Effort Reporting Period:</i> Fall 2005<br/>8/22/2005 to 1/3/2006<br/><i>Compensation for Period:</i> \$30,000.00</p> |

*Sponsored Projects Detail:*

| Project Information       |            | Salary Charged |          | Actual Effort |
|---------------------------|------------|----------------|----------|---------------|
| Project Title             | Project ID | Dollars        | % Salary |               |
| Mathematics for Everyone  | 12345678   | \$6,000.00     | 40.0%    |               |
| <i>Cost Share/ Match:</i> |            | \$6,000.00     |          |               |
| <i>Cost Share/ Match:</i> |            |                | 0.0%     |               |

*Non-Sponsored Detail:*

|                             |             |       |  |
|-----------------------------|-------------|-------|--|
| <i>Other SFSU Functions</i> | \$18,000.00 | 60.0% |  |
|-----------------------------|-------------|-------|--|

*Total Distributions:*

|  |             |      |      |
|--|-------------|------|------|
|  | \$30,000.00 | 100% | 100% |
|--|-------------|------|------|

I certify to the best of my knowledge that this accurately represents my work effort during the Fall 2005 period.

*Employee Signature* \_\_\_\_\_ *Date* \_\_\_\_\_

*Supervisor Signature* \_\_\_\_\_ *Date* \_\_\_\_\_

Total salary charged to the grant for RRT

Total amount of cost-share by the College

Other SFSU Functions= All other faculty responsibilities to SFSU (i.e. Administrative time, teaching, mentoring)  
Compensation for Period = Total amount of salary earned by faculty member during this time period

**San Francisco State University  
Office of Research & Sponsored Programs**

NOTICE OF COST SHARING / MATCHING CONTRIBUTION

A  voluntary  mandatory cost sharing / matching, cost contribution from University funds is required for the following grant proposal:

Date: 07/25/06 Proposal/Project Title: Mathematics for Everyone  
 Duration: 02/01/07-01/31/09 Proposal/Grant/Project Acct #: 2006-03-001  
 Principal Investigator/s: Dr. Jane Smith  
 Total Cost sharing/matching Amount: \$100,000  
 Source of Cost sharing/matching: College ; ORSP Indirects Forgone  
 (Acct. # if applicable)  
 External Funding Source(s): PI

**ACTION TO BE TAKEN**

Please sign and return this Notice of Cost Sharing/Matching Contribution to:

Associate Vice President  
Office of Research and Sponsored Programs  
ADM 471

Principal Investigator's Name: Dr. Jane Smith Date: 07/25/06

Principal Investigator's Signature: \_\_\_\_\_ Phone Ext: **8-0000**

| Cost Sharing Categories                     | Amount \$        | Source (Acct #) | Department/ School  | Approval Signature |
|---|------------------|-----------------|---------------------|--------------------|
| 20% RRT/Fringe (over 2 years)               | \$50,000         |                 | College Dean        |                    |
| ORSP Indirect Costs (10% forgone each year) | \$50,000         |                 | AVP Ken Paap (ORSP) |                    |
| <b>TOTAL:</b>                               | <b>\$100,000</b> |                 |                     |                    |
|   |                  |                 |                     |                    |

Guidelines for use of Notice of Cost Sharing / Cost Matching Contribution



# Thread of Compliance

- Begins in pre-award process
  - Cost-sharing
  - Conflict of interest documentation
  - Human or Animal Subjects Protocol
- Continues in post-award
  - Monitoring of cost-share commitments
  - Monitoring of Human-Animal Subjects Protocol
  - Time and effort reporting
  - Sub-recipient monitoring
  - Monitoring of project expenses
- Ends at project close-out

# ORSP Responsibilities

- Provide appropriate training to PI's, their staff and ORSP staff
- Provide current information regarding ORSP policies and procedures
- Provide accurate financial reports to PIs
- Establish a mechanism for concerns to be heard

# Principal Investigator Responsibilities

- Review monthly financial statements for accuracy
- Report problems/inappropriate charges to Grant Administrator
- Complete time and effort certification forms
- Ensure that cost-share commitments are supporting the project

# College/Department Responsibilities

- Review and approve all cost-share commitments
- Fund all non-personnel cost-share commitments on sponsored projects (i.e. Travel, Supplies)
- Review faculty release time charged to grants
- Certify time and effort reports for absent faculty
- Communicate the importance of the SFSU Compliance Program to Faculty

# Conclusions

- Research compliance is an institutional commitment
- If you have any questions about research compliance issues, please contact us.

# Contact Information

Alison Sanders- Compliance Officer

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Admin 471

<http://www.sfsu.edu/~orspwww/>