SFSU Compliance Program

Alison Sanders
Compliance Officer
Office of Research and Sponsored Programs
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

<table>
<thead>
<tr>
<th>Faculty Information</th>
<th>Effort Information</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Faculty Name:</strong> Jane Smith</td>
<td><strong>Effort Reporting Period:</strong> Fall 2005</td>
</tr>
<tr>
<td><strong>College:</strong> Science and Engineering</td>
<td><strong>8/22/2005 to 1/3/2006</strong></td>
</tr>
<tr>
<td><strong>Department:</strong> Mathematics</td>
<td><strong>Compensation for Period:</strong> $30,000.00</td>
</tr>
</tbody>
</table>

#### Sponsored Projects Detail:

<table>
<thead>
<tr>
<th>Project Information</th>
<th>Salary Charged</th>
<th>Actual Effort</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Project Title:</strong> Mathematics for Everyone</td>
<td><strong>Project ID:</strong> 12345678</td>
<td><strong>Dollars:</strong> $6,000.00</td>
</tr>
<tr>
<td><strong>Cost Share/Match:</strong></td>
<td><strong>$6,000.00</strong></td>
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**Non-Sponsored Detail:**

| Other SFSU Functions | $18,000.00 | 60.0% |

#### Total Distributions:

| 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** ____________

- Green: Total salary charged to the grant for RRT
- Yellow: 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  
Principal Investigator(s): Dr. Jane Smith  
Account #: 2006-03-001  

Total Cost sharing/matching: $100,000  
Source of Cost sharing/matching: College; ORSP Indirects Forgone  
External Funding Source(s): PI

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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

<table>
<thead>
<tr>
<th>Cost Sharing Categories</th>
<th>Amount</th>
<th>Source (Act #)</th>
<th>Department/ School</th>
<th>Approval Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>20% RRT/Pringe (over 2 yrs)</td>
<td>$50,000</td>
<td></td>
<td>College Dean</td>
<td></td>
</tr>
<tr>
<td>ORSP Indirect Costs (10% forgone per year)</td>
<td>$50,000</td>
<td></td>
<td>AVP Finance/ORSP</td>
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</tr>
<tr>
<td>TOTAL:</td>
<td>$100,000</td>
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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
asanders@sfsu.edu
415-405-3943
Admin 471

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