



SAINT LOUIS UNIVERSITY COMPLIANCE 877-525-KNOW



Research Compliance

Who's in the Doghouse?

This month we bring you the results of the Office of Inspector General's (OIG) audit of the University of Illinois at Urbana-Champaign's (UIUC) sponsored agreements with the National Science Foundation (NSF).

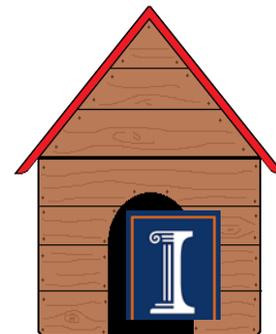
The auditors found that some costs--\$173,290--the University charged to its NSF sponsored agreements did not comply with federal requirements. Items of specific interest:

- Unallowable Salaries of \$52,000 exceeded the NSF two-month maximum
- End of Award Expenses of \$41,000
- Unsupported Expenses: \$39,000
- Foreign Travel: \$13,000

UIUC is asked to refund the \$173,290 to the NSF, and strengthen administrative and management processes and controls.

SLU's Research Compliance Office reminds our Research Community that significant purchases are typically not necessary at the end of a research award and will be questioned by external auditors as unnecessary to the award they are being charged.

If you have questions or concerns about costs being charged to sponsored agreements at SLU, please contact the Office of Sponsored Programs Administration at 977-7742.



Reminder: All Foreign Travel must to be Approved by Compliance for Export Controls

As the calendar year comes to an end and the travel season begins, remember to have your foreign trip approved by Compliance via The Export Controls Officer prior to traveling. Through Export Controls the federal government restricts what information, technology and software that can be shared with foreign nationals. One of the main areas of concern for SLU is foreign travel by faculty, staff and students. To verify compliance with this complex area of federal regulation, we are asking for international travelers to contact the Export Control Officer prior to any foreign travel.

If you are traveling internationally during the winter break and either

- Traveling for SLU business
- Taking SLU equipment

Please contact the Compliance office for Export Control review. 977-5545 or tbrewer3@slu.edu





Q. How do I know if I have a Financial Conflict of Interest that needs to be disclosed?

A. All faculty, staff and students (except undergraduates) involved in research at Saint Louis University must submit a yearly Financial Conflict of Interest Disclosure Form, whether or not an actual conflict of interest exists. If the office of Responsible Conduct of Research finds that your disclosure results in a potential conflict that needs to be managed, you will be contacted for further information and instruction.

Q. How do I complete an annual Financial Conflict of Interest Disclosure Form?

A. Please [click here](#) for instructions to submit your annual disclosure.

Q. I have Non-SLU researchers on my project. Do they comply with SLU's FCOI Policy?

A. In order to comply with federal regulations for conflict of interest, Saint Louis University's Office of Research Integrity must be in receipt of all Non-SLU disclosures prior to the submission of any external application for research funding and before award funds are disbursed.

- If a Non-SLU researcher will be part of a subaward agreement, then the subcontractor can provide written documentation indicating whether to use its own policy. Satisfactory documentation includes one of the following:
 - A [Letter of Intent to Establish a Consortium Agreement](#); or
 - [COI Certification Template Letter](#)
- If a Non-SLU researcher is involved on the project without the issuance of a subaward or a subcontractor elects to comply with SLU's FCOI policies and procedures, then a [Non-SLU COI Disclosure Form](#) is required prior to the submission of any external application for research funding and before award funds are disbursed. FCOI training will also be required at the time of award.

As documented FCOI disclosure is required prior to submission of an application, such disclosure should be initiated at least ten (10) working days in advance of the application deadline for Non-SLU senior/key personnel and other Non-SLU individuals involved in the design, conduct or reporting of research.

What is the Hotline?

The Saint Louis University Compliance Hotline is available as a confidential, toll-free resource for anyone with a concern regarding business, billing, and/or ethical practices in his or her department. Anonymous or self-identified reports of any nature can be made to the Hotline at [1-877-525-KNOW \(5669\)](tel:1-877-525-KNOW).

- The Hotline is available 24 hours a day, seven days a week.
- All calls are answered by a person who is not affiliated with Saint Louis University.
- No call tracing or recording devices are ever used during the phone call. Your call will be answered by a trained interview specialist who will submit a report to the SLU Compliance Department
- You have the option to give your name or report anonymously.
- You will be given a password and call back date at the end of your call should you desire to follow up on the status of your report, or if you would like to provide additional information.
- All Saint Louis University employees, agents, and contractors are protected from discrimination and retaliation for filing a report to the Hotline.