OUR MISSION

The Office of the Vice Chancellor for Research provides innovative leadership, support, and service to the University and faculty to enhance and grow research that is conducted ethically and responsibly for the benefit of society.
MESSAGE FROM THE VICE CHANCELLOR

A robust culture of responsible conduct of research is one of Washington University’s greatest assets, which is only made possible by every community member’s commitment to upholding the highest ethical, legal and regulatory standards. It is with this in mind that we will continue to work with integrity as we further our mission of discovering and sharing new knowledge in service to, and for the benefit of, our community, country and world.

To provide faculty and staff with a single tool to better locate the resources and expertise to support these principles, I am pleased to present this Research Compliance Guide.

Jennifer K. Lodge, Vice Chancellor for Research
Washington University in St. Louis
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Washington University is committed to the objective, ethical, and responsible conduct of research. All members of the University community involved in research will take personal responsibility for their actions in pursuit of individual and organizational excellence. Each individual will uphold the highest standards of ethical and professional conduct in accordance with the Washington University Code of Conduct, sponsoring agency policies and regulations, and all other University policies governing research.

HOW TO USE THIS GUIDE
The research administration process (illustrated below) is a multi-stage collaborative effort between many key partners across the University. Success requires that each key partner take an active role to assure that the research is proposed, performed, and managed ethically and responsibly.

Utilize this guide to help you identify research-related compliance areas, resources, and tools that assist the Washington University research community to effectively propose, perform, and manage research projects. This guide is not meant to be a comprehensive or detailed inventory of University or office policies, guidelines, or procedures.

For the most current version of this *Guide*, please visit ComplianceGuide.wustl.edu.
REPORTING VIOLATIONS AND CONCERNS

GENERAL EXPECTATIONS
Each community member is expected to report violations or concerns that come to his/her attention. Managers have a special duty to adhere to the standards set forth in the University’s Code of Conduct and other policies, procedures, and guidelines; to recognize violations; and to enforce these standards. Disciplinary actions for proven violations, or for retaliation against anyone who reports possible violations, will be determined on a case-by-case basis and may include termination of employment. Individuals who violate these standards may also be subject to civil and criminal charges in some circumstances.

HOW TO REPORT A VIOLATION OR DISCUSS A CONCERN
You may report violations or concerns to your immediate supervisor or department head, if appropriate. You may also call the University Compliance Hotline at the number established for this purpose: 314.362.4998. Reports may be made anonymously to this number, if the caller so desires. This telephone line has no caller identification or number recognition.

You may also access a form that can be used to report violations or concerns on the Code of Conduct website at: https://universitycompliance.wustl.edu/codeofconduct/Pages/Onlinereportingform.aspx

For matters dealing with one of the specific areas below, you may call the number indicated, or you may call the University Compliance Office at 314.362.4910.

Text from http://codeofconduct.wustl.edu/procedures.html

ISSUES & CONTACTS

General Concerns | University Compliance Office
Tel: 314.362.4910 | Anonymous Compliance Hotline: 314.362.4998

Animal Care Issues | Vice Chancellor for Research
Tel: 314.747.0515

Conflict of Interest Issues - Research | Vice Chancellor for Research
Tel: 314.747.0515

Environmental Health & Safety Issues | Asst. Vice Chancellor for Environmental Health & Safety
Tel: 314.362.6816

HIPAA (Health Insurance Portability and Accountability Act) Issues

Privacy Issues | HIPAA Privacy Office
Tel: 314.747.4975

Security Issues | Information Security Office
Tel: 314.747.2955

Human Studies Issues | Vice Chancellor for Research
Tel: 314.747.0515

Financial Issues | Vice Chancellor for Finance & CFO
Tel: 314.935.9018

Physician and Medical Professional Billing Issues | Director of Physician Billing Compliance
Tel: 314.747.7660

Research Financial Management Issues | Vice Chancellor for Research
Tel: 314.747.0515

Research Integrity Issues | Vice Chancellor for Research
Tel: 314.747.0515
COMPLIANCE AREAS
ANIMAL STUDIES

ROLES/RESPONSIBILITIES

Faculty and staff who use vertebrate animals in research or training are responsible for submitting a protocol application for approval to the Institutional Animal Care and Use Committee (IACUC); obtaining the proper education and/or training relating to the care for and use of vertebrate animals; ensuring proper training documentation is submitted to the IACUC to receive access to the animal facility from Division of Comparative Medicine (DCM); conducting research in accordance with approved protocol and University policies; cooperating with unannounced semiannual facility and/or laboratory inspections conducted by WUSTL and other regulatory entities; maintaining protocol progress reports annually; and retraining or resubmitting protocols as necessary.

EDUCATION/TRAINING

Contact the Division of Comparative Medicine (DCM) to register for training in animal welfare education. See website for details: https://research-test.wustl.edu/topics/animal-care-use

POLICIES/GUIDELINES

https://research.wustl.edu/topics/animal-care-use – click on Policies, Procedures, and Guidelines

INSTITUTIONAL OVERSIGHT

Institutional Animal Care and Use Committee (IACUC)
Web: http://iacuc.wustl.edu

CONTACTS

For questions related to protocol submission:
Institutional Animal Care and Use Committee (IACUC)
Campus Box 1054
Tel: 314.362.3229 | Web: http://iacuc.wustl.edu

For questions related to animal welfare education:
Division of Comparative Medicine (DCM)
Campus Box 8061
Tel: 314.362.3700 | Fax: 314.362.6480 | Web: http://dcminfo.wustl.edu
AUTHORSHIP & PUBLICATION STANDARDS

ROLES/RESPONSIBILITIES
Individuals that prepare scientific or other scholarly information for abstracts, publications, grant applications, or presentations are responsible for following the University Policy for Authorship on Scientific and Scholarly Publications; reviewing and adhering to specific authorship criteria set forth by publishers or granting institutions (in some cases); and reporting violations.

EDUCATION/TRAINING
For general education in University authorship standards, please access the Responsible Authorship and Publication Practices tutorial at: https://research.wustl.edu/topics/research-integrity under Education & Training
Assistance in publishing support: https://becker.wustl.edu/classes-consulting/specialized-expertise/publishing-evaluation-support

POLICIES/GUIDELINES
Policy for Authorship on Scientific and Scholarly Publications: https://research.wustl.edu/policy-authorship-scientific-scholarly-publications
Additional resources may be found at: https://research.wustl.edu/topics/research-integrity

INSTITUTIONAL OVERSIGHT
Committee on Research Integrity (CRI)
Web: http://cri.wustl.edu

CONTACTS
For publication support and services:
Becker Medical Library
Campus Box 8132
Tel: 314.362.7080 | Fax: 314.454.6606 | Web: http://becker.wustl.edu
For questions related to authorship:
CRI Program
Campus Box 1054
Tel: 314.747.5571 | Fax: 314.362.8712 | Eml: reco@wusm.wustl.edu | Web: http://reco.wustl.edu
Office of the Vice Chancellor for Research (OVCR)
Campus Box 8106
Tel: 314.747.0515 | Fax: 314.367.6666 | Web: https://research.wustl.edu
CLINICAL TRIALS

ROLES/RESPONSIBILITIES
Faculty and staff who conduct clinical trials on human subjects must register trials at ClinicalTrials.gov in accordance with sponsor and publisher policies; be aware of all aspects of human participant research protection and confidentiality requirements (see Human Research and HIPAA sections of this guide); comply with the terms of any industry-sponsored clinical trial agreements; meet all obligations of specific sponsors, such as the National Institutes of Health and the Food and Drug Administration; and comply with the institutional plan for billing compliance. Investigators are individually responsible for their compliance as well as assuring that members of their research team are conducting research ethically and responsibly.

EDUCATION/TRAINING AND HUMAN RESEARCH EDUCATION POLICY
Any faculty and staff that interact with human research participants may be required to complete human research education or training modules. For more details, please see: http://www.wustl.edu/policies/humansubjectseducation.html
Staff that enroll participants into the Billing Matrix must complete training to receive access to the site. Email: ccsbillingmatrix@wusm.wustl.edu for a link to the online training module and account request information.

POLICIES/GUIDELINES
Clinical trials registration guidelines: https://research.wustl.edu/guideline-clinical-trials-registration
Clinical research forms: https://research.wustl.edu/topics/human-subjects-research under Forms & Templates

INSTITUTIONAL OVERSIGHT
Center for Applied Research Sciences (CARS)
Human Research Protection Office (HRPO)
Office of Physician Billing Compliance
Office of Sponsored Research Services (OSRS)

CONTACTS
For questions regarding clinical trials registration, and the Billing Matrix:
Center for Clinical Studies (Also known as CARS)
Campus Box 8009 | Tel: 314.747.4000 | Fax: 314.747.1404 | Web: http://ccs.wustl.edu

For questions regarding human research protocol submission and human research education:
Human Research Protection Office (HRPO)
Campus Box 8089 | Tel: 314.747.6800 | Web: http://hrpo.wustl.edu

For questions regarding billing compliance:
Office of Physician Billing Compliance
Campus Box 8041 | Tel: 314.747.7661 | Fax: 314.747.7666 | Web: http://opbc.wustl.edu

For questions regarding clinical trial agreements:
Joint Research Office for Contracts (JROC)
Campus Box 1054 | Tel: 314.747.5393 | Fax: 314.362.8712

For questions regarding clinical research grants:
Office of Sponsored Research Services (OSRS)
Campus Box 1054 | Tel: 314.747.4134 | Fax: 314.362.8712 | Web: http://osrs.wustl.edu
CODE OF CONDUCT

ROLES/RESPONSIBILITIES
Faculty and staff members are responsible for complying with guidelines set forth by the University Compliance Program, which includes, but is not limited to: reading, annually certifying, and adhering to the ethical and legal standards outlined in the University Code of Conduct at all times; maintaining the highest ethical standards; complying with all relevant laws and regulations; cooperating with monitoring from central offices and audits performed by the University Compliance Office; attending training as a proactive measure; attending training and conducting monitoring as required in their area of responsibility; and reporting concerns of questionable practices by any member of the University community.

EDUCATION/TRAINING
Education is administered through area-specific compliance offices such as those in this guide. For a summary of research-related programming, visit: https://research.wustl.edu/education-and-awareness/

POLICIES/GUIDELINES
University Code of Conduct: http://codeofconduct.wustl.edu – click on “Full PDF form here”

INSTITUTIONAL OVERSIGHT
University Compliance Office (UCO)

CONTACTS
University Compliance Office (UCO)
Campus Box 8016
Tel: 314.362.4915 | Fax: 314.362.4954 | Web: http://universitycompliance.wustl.edu
Anonymous Hotline: 314.362.4998
Anonymous Online Reporting Form:
https://universitycompliance.wustl.edu/codeofconduct/Pages/Onlinereportingform.aspx
COMPLIANCE PROFILE AND EDUCATION

ROLES/RESPONSIBILITIES
Faculty and staff are responsible for completing the Compliance Profile and assigned compliance-related trainings in Learn@Work. The Compliance Profile is an interactive web-based questionnaire available to faculty and staff. It is designed to identify the various compliance and educational activities required of investigators, and is specific to their responsibilities at WUSTL. The profile also provides a direct link to the activity or additional information needed to complete the requirement.

Learn@Work, the University’s cloud-based learning management system, provides a consolidated and streamlined training experience for faculty and staff to complete and track all compliance-related training activities in a single application.

EDUCATION/TRAINING
For Learn@Work training, visit: http://LearnatWork.wustl.edu/training

POLICIES/GUIDELINES
LearnatWork.wustl.edu

INSTITUTIONAL OVERSIGHT
Human Resources

CONTACTS
Human Resources, Learn@Work System Administrator
Tel: 314.935.5707 | Eml: LearnatWork@wustl.edu | Web: http://LearnatWork.wustl.edu
EFFORT REPORTING

ROLES/RESPONSIBILITIES
Faculty and staff who work on sponsored projects are responsible for reviewing and certifying accuracy of their electronic Personnel Activity Report (ePAR) to ensure that salary charges to sponsored projects are reasonable in relation to the actual work performed. The University supports the effort reporting requirements through online certification of an electronic Personnel Activity Report (ePAR). Certification is completed through the electronic Personnel Activity Reporting System (ePARS) during the fiscal year depending on faculty or staff role:
- Semi-annual: School of Medicine faculty
- Semi-annual: School of Engineering faculty that work on sponsored projects
- Semester: Danforth faculty that work on sponsored projects
- Quarter: Staff/Students that work on sponsored projects

EDUCATION/TRAINING
General Effort Reporting Education
All faculty from the School of Medicine and faculty that work on sponsored funds on the Danforth campus are required to complete effort reporting training. Staff and students that work on sponsored funds are strongly encouraged to complete effort reporting training.
The Effort Reporting Principles online training modules are accessible via Learn@Work: http://LearnatWork.wustl.edu
Additional educational information and resources are available on the SPA website: https://financialservices.wustl.edu/wfin-topic/sponsored-projects-accounting/personnel-cost/effort-reporting/

ePARS System
ePARS is accessible via http://one.wustl.edu
System tutorials and training on the ePARS System are accessible via the ePARS website: http://epars.wustl.edu

POLICIES/GUIDELINES

INSTITUTIONAL OVERSIGHT
Sponsored Projects Accounting

CONTACTS
Sponsored Projects Accounting (SPA)
Campus Box 1034
Tel: 314.935.7216 | Fax: 314.935.4309 | Web: http://spa.wustl.edu
ENVIRONMENTAL HEALTH & SAFETY

ROLES/RESPONSIBILITIES
Faculty and staff are responsible for attending appropriate trainings/annual retraining; ensuring that other lab personnel attend appropriate trainings/annual retraining; wearing appropriate protective equipment; cooperating with facility and/or laboratory inspections by WUSTL or regulatory agency entities; adhering to general Environmental Health & Safety (EH&S) regulatory requirements and guidelines; managing hazardous and/or radioactive materials and/or their disposal in accordance with EH&S guidelines, state and federal regulations; registering research with EH&S and/or other appropriate entities as necessary; licensing laboratory equipment and/or spaces with the State of Missouri as necessary; applying for, updating, and/or reauthorizing registrations as required.

EDUCATION/TRAINING
Requirements depend on personnel role and/or equipment need. Contact Environmental Health & Safety to determine training needs prior to working with hazardous materials and/or equipment.

POLICIES/GUIDELINES
http://ehs.wustl.edu/committees
http://ehs.wustl.edu/resources/Pages/ResourcesSearch.aspx
https://radsafety.wustl.edu

INSTITUTIONAL OVERSIGHT
Institutional Biological & Chemical Safety Committee
Radiation Safety Committee
Radioactive Drug Research Committee

CONTACTS
Environmental Health & Safety (EH&S)
Campus Box 1010
Tel: 314.362.6816 | Fax: 314.935.9266 | Web: http://ehs.wustl.edu

For each of the divisions below, call the main EH&S telephone number:

Biological & Chemical Safety - EH&S
Web: http://ehs.wustl.edu

Emergency Preparedness - Emergency Management
Web: http://emergency.wustl.edu

Environmental Compliance - EH&S
Web: http://ehs.wustl.edu/hmm

Occupational Safety – EH&S
Web: http://ehs.wustl.edu

Radiation Safety Office - EH&S
Web: http://radsafety.wustl.edu
24-hour emergency cell: 314.299.1322
EXPORT CONTROLS

ROLES/RESPONSIBILITIES
Export control laws govern the transfer of strategic technology and information to foreign countries and to foreign nationals within the U.S. (“deemed exports”). These regulations can affect the shipment or transfer of technologies and information overseas, foreign travel, foreign visitors, and foreign national participation in research occurring on campus. Faculty and staff are responsible for maintaining compliance with export control laws. The Export Control Manager (ECM) can assist faculty and staff to determine if, and how, export control regulations apply to their research and other activities. The ECM can also help faculty to obtain the appropriate export license(s) before controlled items or technical data are transferred across U.S. boundaries or are accessed by foreign nationals on campus.

EDUCATION/TRAINING
Information regarding export trade controls is available via: https://research.wustl.edu/topics/export-controls
You may contact the Export Control Manager to arrange presentations for faculty and staff.

POLICIES/GUIDELINES
The University policy on export control can be found at: https://research.wustl.edu/export-control-policy/

INSTITUTIONAL OVERSIGHT
Because issues related to export controls can arise in a variety ways, whether through acceptance of sponsored research contracts, material transfers, travel, shipping, or attending conferences, institutional oversight of export trade controls works through many channels. The primary contact is listed below. In the event that a license is required to comply with export laws, faculty and staff must work with the Export Control Manager to obtain and document compliance with the applicable licensing requirements.

CONTACTS
To determine the applicability of export control regulations to a particular situation, for restricted party screening, or for other export control issues please contact:

Export Control Manager
Office of Sponsored Research Services
Campus Box 1054
Tel: 314.747.1378 | Eml: ovcrexportcompliance@wustl.edu
HEALTH INFORMATION PORTABILITY AND ACCOUNTABILITY ACT (HIPAA)

ROLES/RESPONSIBILITIES
Faculty and staff who have contact with protected health information must complete Washington University’s HIPAA training prior to any contact with protected health information (PHI) or within ten days of employment.

EDUCATION/TRAINING
HIPAA training modules may be found in the Learn@Work Learning Management System: Learn@Work.wustl.edu

POLICIES/GUIDELINES
http://hipaa.wustl.edu

INSTITUTIONAL OVERSIGHT
HIPAA Privacy Office
Information Security Office

CONTACTS
For questions regarding the access, use, and disclosure of PHI:
HIPAA Privacy Office
Campus Box 8098
Tel: 314.747.4975 | Fax: 314.362.1199 | Web: http://hipaa.wustl.edu
Toll Free: 866.747.4975

For questions regarding the physical and technical security of electronic PHI:
Information Security Office
Campus Box 8218
Tel: 314.747.2955 | Fax: 314.747.2866 | Web: http://informationsecurity.wustl.edu
HUMAN EMBRYONIC STEM CELL RESEARCH

ROLES/RESPONSIBILITIES
Faculty and staff using human embryonic stem cells (hESC) for research purposes must submit an application and research protocol to the Embryonic Stem Cell Research Oversight Committee (ESCRO) prior to initiation of experiments utilizing hESC (ESCRO approval may be required earlier dependent upon funding agency requirements); must also obtain IRB review; conduct research in accordance with the approved protocol and University policies; report modifications; file annual protocol renewals; adhere to material transfer agreements; and cooperate with any protocol monitoring.

EDUCATION/TRAINING
Information on human embryonic stem cell research is available via: http://escro.wustl.edu
Any faculty and staff involved in human embryonic stem cell research may be required to complete human research education or training, dependent upon the nature of the research. For more details, please see: http://www.wustl.edu/policies/humansubjectseducation.html

POLICIES/GUIDELINES
https://research.wustl.edu/topics/human-embryonic-stem-cells/

INSTITUTIONAL OVERSIGHT
Embryonic Stem Cell Research Oversight Committee (ESCRO)
Web: http://escro.wustl.edu

CONTACTS
ESCRO Program
Campus Box 1054
Tel: 314.747.5571 | Fax: 314.362.8712 | Eml: reco@wusm.wustl.edu | Web: http://reco.wustl.edu
HUMAN RESEARCH

ROLES/RESPONSIBILITIES
Faculty and staff working on projects (research, teaching, or other) involving human participants and/or human embryonic stem cells must complete the appropriate online human research training module(s); submit research protocol applications for approval prior to the initiation of each project; conduct research in accordance with approved protocol and University policies; report modifications and unanticipated problems in a timely manner; cooperate with any protocol monitoring; and file annual protocol reviews. Faculty and staff that work with human embryonic stem cells must submit protocols to the Embryonic Stem Cell Research Oversight Committee (ESCRo).

EDUCATION/TRAINING
Any faculty and staff that interact with human research participants may be required to complete human research education or training modules. For more details, please see: http://www.wustl.edu/policies/humansubjectseducation.html
The University offers many educational opportunities for faculty and staff involved in human research. Access the Research Education Calendar for upcoming events: https://research.wustl.edu/events

POLICIES/GUIDELINES
Human Embryonic Stem Cell Guidance: https://research.wustl.edu/stem-cell-research-guidelines/

INSTITUTIONAL OVERSIGHT
Human Research Protection Office (HRPO) (WUSTL IRB)
Human Research Quality Assurance and Quality Improvement Committee
Embryonic Stem Cell Research Oversight Committee (ESCRo)

CONTACTS
For human research protocol submission and human research education:
Human Research Protection Office (HRPO)
Campus Box 8089 | Tel: 314.747.6800 | Web: http://hrpo.wustl.edu

For human research monitoring:
Human Research Quality Assurance/Quality Improvement Program (HR QA/QI)
Campus Box 1054 | Tel: 314.747.5526 | Fax: 314.362.8712
Web: https://research.wustl.edu/offices/human-research-quality-assurance-program

For human embryonic stem cell research:
Embryonic Stem Cell Research Oversight Committee (ESCRo)
Campus Box 1054 | Tel: 314.747.5571 | Fax: 314.362.8712 | Eml: reco@wusm.wustl.edu
Web: http://escro.wustl.edu
INTELLECTUAL PROPERTY

ROLES/RESPONSIBILITIES

Faculty and staff who have developed new technology with significant use of University resources, or are involved in the transfer of materials or other intellectual property, are responsible for submitting the necessary paperwork to the Office of Technology Management (OTM). Faculty and staff are also responsible for following University policy and guidelines that address, among other things, ownership of intellectual property and revenue sharing from the licensing of intellectual property; and are responsible for otherwise assisting the University in meeting its obligation to federal funding agencies that require commercialization of ideas for public benefit.

EDUCATION/TRAINING

OTM staff are available for formal presentations or informal discussions regarding intellectual property and technology management. OTM also runs workshops and seminars to provide researchers with seminal information relating to the invention and commercialization process. More information can be found here: http://otm.wustl.edu/educational-opportunities

POLICIES/GUIDELINES

Material Transfer Guidelines: http://otm.wustl.edu/for-inventors/material-transfer
Invention and Licensing Policies: http://otm.wustl.edu/for-inventors/policies

INSTITUTIONAL OVERSIGHT

Office of the Provost
Web: https://provost.wustl.edu

CONTACTS

Office of Technology Management (OTM)
Campus Box 8013
Tel: 314.747.0920 | Fax: 314.362.5872 | Web: http://otm.wustl.edu
PUBLIC ACCESS

ROLES/RESPONSIBILITIES
In a policy memorandum dated 22 February 2013, the White House Office of Science and Technology Policy (OSTP) directed all Federal agencies with more than $100M in R&D expenditures to develop plans to provide public access to the “results” of federally funded research. Results are defined as “peer-reviewed research publications and digital data sets."

EDUCATION/TRAINING
Becker Medical Library regularly offers educational presentations on how to comply with federal agency public access policies. To schedule a customized presentation for your group, you may contact any of the offices listed under Contacts.

POLICIES/GUIDELINES
Investigators are already aware of the NIH Public Access Policy which has been in force since 2008. As a result of the 2013 OSTP memorandum, other Federal agencies are implementing similar public access policies. Investigators receiving federal funds are responsible for making sure that applicable journal articles resulting from those funds are compliant with the Public Access Policy of their sponsoring agency.

INSTITUTIONAL OVERSIGHT
Assistance with public access compliance is provided by the Becker Medical Library, the University Libraries, and the Office of Sponsored Research.

CONTACTS
School of Medicine
Research and Publication Support
Tel: 314.362.7865 | Eml: sarlic@wustl.edu

Danforth Campus
University Libraries
Tel: 314.935.4819 | Eml: rlewis@wustl.edu

Office of Sponsored Research Services
Tel: 314.747.1378 | Eml: langton@wustl.edu
RESEARCH CONFLICTS OF INTEREST

ROLES/RESPONSIBILITIES
Individuals are responsible for guarding against financial conflicts of interest which might compromise the integrity and objectivity of research. In addition to all faculty, individuals having independent responsibility for the design, conduct, or reporting of research must report all personal financial interests at least annually through the Financial Disclosure System and as otherwise requested. Education is required every four years. All financial conflicts of interest must be appropriately managed to ensure the objectivity of the research according to applicable University policies.

EDUCATION/TRAINING
Information regarding research conflicts of interest is available via: http://coi.wustl.edu
The Program for the Ethical and Responsible Conduct of Science and Scholarship (PERCSS) Conflict of Interest online educational module is accessible via Learn@Work: http://LearnatWork.wustl.edu

POLICIES/GUIDELINES
University Research Conflicts of Interest Policy:
https://research.wustl.edu/research-conflicts-interest-policy-guidelines

INSTITUTIONAL OVERSIGHT
Conflicts of Interest Review Committee (CIRC)
Web: http://coi.wustl.edu

CONTACTS
COI Program
Campus Box 1054
Tel: 314.362.2709 | Fax: 314.362.8712 | Eml: coi@wustl.edu | Web: http://coi.wustl.edu
RESEARCH INTEGRITY

ROLES/RESPONSIBILITIES
Individuals are responsible for protecting the integrity of the research process by conducting research within certain ethical standards and reporting concerns of research misconduct by any member of the University community to the Research Integrity Officer (RIO), Vice Chancellor for Research (VCR), the Research Ethics and Compliance Office (RECO), or the University Compliance Hotline.

EDUCATION/TRAINING
Information regarding research integrity is available via: http://cri.wustl.edu

The Program for the Ethical and Responsible Conduct of Science and Scholarship (PERCSS) Research Integrity and Responsible Authorship and Publication Practices online educational modules are accessible via Learn@Work: http://LearnatWork.wustl.edu
For a list of other research-related educational programming, visit: https://research.wustl.edu/education-and-awareness

POLICIES/GUIDELINES
Research Integrity Policy: https://research.wustl.edu/washington-university-research-integrity-policy
Policy for Authorship on Scientific and Scholarly Publications: https://research.wustl.edu/policy-authorship-scientific-scholarly-publications

INSTITUTIONAL OVERSIGHT
Committee on Research Integrity (CRI)
Web: http://cri.wustl.edu

CONTACTS
CRI Program
Campus Box 1054
Tel: 314.747.5571 | Fax: 314.362.8712 | Em: reco@wusm.wustl.edu | Web: http://reco.wustl.edu

Research Integrity Officer (RIO)
Campus Box 1054
Tel: 314.286.2887

Vice Chancellor for Research (VCR)
Campus Box: 8106
Tel: 314.747.0515
RESponsible CONduct OF RESEARCH

roles/responsibilities

The University is committed to the highest ethical and professional standards of conduct in research, and relies on each community member’s ethical behavior, honesty, integrity, and good judgment. Individuals are responsible for the compliant, ethical, and responsible design, conduct, reporting, and reviewing of research in accordance with federal, state, and local regulations and University and sponsoring agency policies and procedures.

education/training

The University offers many educational opportunities for researchers interested in learning more about research integrity, ethics, and responsible conduct.

The Program for the Ethical and Responsible Conduct of Science and Scholarship (PERCSS) online educational modules are accessible via Learn@Work: http://LearnatWork.wustl.edu

For additional responsible conduct of research education:

https://research.wustl.edu/events

Policies/guidelines

Many University policies and procedures serve to promote responsible and ethical conduct in research. For a list of policies and guidelines related to research, see:

https://research.wustl.edu/university-research-policies

For guidelines and tools addressing applicable RCR requirements of the National Institutes of Health (NIH) and the National Science Foundation (NSF), see:

https://research.wustl.edu/topics/responsible-conduct-research/

Institutional oversight

Office of the Vice Chancellor for Research

Web: https://research.wustl.edu

Contacts

Research Education and Information (REI)

Campus Box 1054

Tel: 314.362.2709 | Fax: 314.362.8712 | Web: http://rei.wustl.edu
SPONSORED PROJECTS

ROLES/RESPONSIBILITIES
Faculty and staff are responsible for obtaining institutional signature on proposals; submitting all paperwork to the appropriate office; partnering with departmental and central administration staff for administration of sponsored project funds in accordance with sponsor regulations and guidelines, and University policy and procedures; obtaining review, negotiation, and institutional signature on all research grants, contracts and subagreements; and cooperating with and verifying award management and financial transactions on a regular basis. These responsibilities apply throughout the process of obtaining and managing sponsored funds and should be fulfilled in a time-appropriate manner in accordance with sponsor, federal, and University deadlines, until the closeout of the award.

EDUCATION/TRAINING
Education for faculty and staff on proposal development, financial and award management, and contracts and subagreements is offered regularly. Access the Research Education Calendar for upcoming courses: https://research.wustl.edu/events

POLICIES/GUIDELINES
For research-related policies and guidelines: http://research.wustl.edu/PoliciesGuidelines
For financial management policies and guidelines: http://spa.wustl.edu/policies.htm

CONTACTS
Proposal Submission and Non-financial Award Management
Office of Sponsored Research Services (OSRS)
Campus Box 1054 | Tel: 314.747.4134 | Fax: 314.362.8712 | Web: http://osrs.wustl.edu

Financial Award Management
Sponsored Projects Accounting (SPA)
Campus Box 1034 | Tel: 314.935.7089 | Fax: 314.935.4309 | Web: http://spa.wustl.edu

Contracts/Subagreements
For any contracts or incoming subagreements, including industry sponsored clinical trials:
Joint Research Office for Contracts (JROC)
Campus Box 1054 | Tel: 314.747.5393 | Fax: 314.362.8712 | Web: http://osrs.wustl.edu

For outgoing subagreements:
Office of Sponsored Research Services (OSRS)
Campus Box 1054 | Tel: 314.747.4134 | Fax: 314.362.8712 | Web: http://osrs.wustl.edu
RESEARCH COMPLIANCE
RESOURCES & TOOLS
<table>
<thead>
<tr>
<th>RESOURCE/ TOOL</th>
<th>DETAILS &amp; CONTACT INFORMATION</th>
</tr>
</thead>
</table>
| Core Research Facilities | Core Facilities provide access to specialized equipment, expertise, and support that are often not available to individual investigators or laboratories.  
  https://research.wustl.edu/core-facilities  
  **Office of Sponsored Research Services**  
  Tel: 314.747.1654 | Eml: cdeterman@wustl.edu |
| Compliance Profile | The Compliance Profile is an interactive web-based questionnaire available to faculty and staff. It is designed to identify the various compliance and educational activities required of investigators, and is specific to their responsibilities at WUSTL. The profile also provides a direct link to the activity or additional information needed to complete the requirement. The Profile is accessible via Learn@Work.  
  http://LearnatWork.wustl.edu  
  **Human Resources, Learn@Work System Administrator**  
  Eml: LearnatWork@wustl.edu |
| Faculty Financial Reporting | Faculty Financial Reporting (FFR) is a web-based set of reports that assist faculty members in the financial management of a grant, project, contract or other sponsored agreement for which he or she is personally responsible. FFR provides a quick “snapshot” of the fund as of the previous business day.  
  https://financialservices.wustl.edu/wfin-topic/sponsored-projects-accounting/additional-resources/  
  **Sponsored Projects Accounting**  
  Tel: 314.935.7089 | Web: http://spa.wustl.edu |
| ONE.wustl | ONE is a lightweight portal that helps you locate university systems and services faster and easier. With robust search capabilities, ONE aggregates key services and applications across the WashU landscape into one web portal, presenting information as tasks with direct links to the desired functionality.  
  http://one.wustl.edu  
  **Information Technology**  
  Tel: 314.933.3333 | Eml: ithelp@wustl.edu |
| OVCR Website | The Office of the Vice Chancellor for Research (OVCR) website is a consolidated source of information related to research compliance, administration, and management. All information and resources included in this guide are accessible via the OVCR website.  
  https://research.wustl.edu  
  **Research Education and Information**  
  Tel: 314.362.2709 | Eml: ovcrinfo@wustl.edu |
### Proposal Development Resources Website

The Proposal Development Resources website is an online toolkit for researchers and administrators. It provides a number of features, including the ability to locate information about the University for agency forms; find samples of successful proposals and data sharing plans; locate financial and award information and trends; and more.

http://proposalhelp.wustl.edu

**Office of Sponsored Research Services**

Tel: 314.747.4134 | Eml: researchgrants@wusm.wustl.edu

**Joint Research Office for Contracts**

Tel: 314.747.5393 | Eml: wucontracts@wumail.wustl.edu

### Research Education Calendar

The Research Education Calendar is a special feature of the OVCR Website. The Calendar is updated regularly with internal and external lectures, courses, series, and conferences related to research compliance, administration, and management.

https://research.wustl.edu/events

**Research Education and Information**

Tel: 314.362.2709 | Eml: ovcrinfo@wustl.edu

### Research News Listserv

Research News is an informational tool designed by the Office of the Vice Chancellor for Research to keep faculty, research support staff, and central area offices informed about current topics and issues related to research compliance, administration, and management at the University. Research News subscribers will receive email messages on topics they have pre-selected during the subscription process. To subscribe, visit:

http://researchnews.wustl.edu

**Research Education and Information**

Tel: 314.362.2709 | Eml: rei@wusm.wustl.edu

### Research Policies and Procedures

The University is committed to the development, implementation, and maintenance of policies and guidelines that promote the compliant, ethical, and responsible design, conduct, reporting, and reviewing of research in accordance with Federal, state, and local regulations and sponsoring agency policies and procedures. The OVCR website provides access to research-related policies and procedures at:

https://research.wustl.edu/university-research-policies

**Research Education and Information**

Tel: 314.362.2709 | Eml: rei@wusm.wustl.edu

### Research Roles and Responsibilities

The goal of the Roles and Responsibilities document is to provide comprehensive descriptions of the duties of the key individuals and organizational units that design, conduct, report, and/or support University research activities.

http://roles.wustl.edu

**Research Education and Information**

Tel: 314.362.2709 | Eml: rei@wusm.wustl.edu
<table>
<thead>
<tr>
<th>RESOURCE/TOOL</th>
<th>DETAILS &amp; CONTACT INFORMATION</th>
</tr>
</thead>
</table>
| SPIN          | SPIN provides intuitive and easily customizable access to the most extensive research funding opportunity database on earth. Tools are provided that are geared towards both individual and administrative users, and SPIN provides both active searching as well as automated, daily opportunity notifications. Access via RMS. [http://rms.wustl.edu](http://rms.wustl.edu)  
**Funding Resources Coordinator**  
Tel: 314.747.1654 | Eml: determanc@wustl.edu |
GLOSSARY OF RESEARCH COMPLIANCE TERMS
<table>
<thead>
<tr>
<th>TERM</th>
<th>DEFINITION</th>
</tr>
</thead>
<tbody>
<tr>
<td>AAHRPP</td>
<td>Association for the Accreditation of Human Research Protection Programs. WUSTL has full AAHRPP accreditation.</td>
</tr>
<tr>
<td>AAALAC</td>
<td>Association for Assessment and Accreditation of Laboratory Animal Care. WUSTL has full AAALAC accreditation.</td>
</tr>
<tr>
<td>ASC</td>
<td>Animal Studies Committee, the former name of the Institutional Care and Use Committee (IACUC)</td>
</tr>
<tr>
<td>Audit</td>
<td>Formal examination of the transactions, controls, and system of an organization or individual. An audit may also include examination of compliance with applicable terms, laws, and regulations. Audit types include internal audits, external audits, and funding agency audits.</td>
</tr>
<tr>
<td>Authorized</td>
<td>The signature of an institutional official who is designed to give assurances, make commitments, and execute such documents on behalf of Washington University. Signature of an authorized official certifies that commitments made on grant proposals or contract agreements will be honored and ensures that all sponsored agreements conform to Federal regulations, agency guidelines, and Washington University policy.</td>
</tr>
<tr>
<td>Signature</td>
<td></td>
</tr>
<tr>
<td>CARS</td>
<td>Center for Applied Research Sciences</td>
</tr>
<tr>
<td>Clinical Trial</td>
<td>An agreement to test drugs, devices, or other controlled substances for FDA approval or for-profit corporations. A clinical study involves the use of humans; a pre-clinical study may involve animal subjects.</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
</tr>
<tr>
<td>CIRC</td>
<td>Conflicts of Interest Review Committee</td>
</tr>
<tr>
<td>COI</td>
<td>Conflict of Interest</td>
</tr>
<tr>
<td>Compliant</td>
<td>The state of being in accordance with the relevant Federal or regional authorities and their requirements.</td>
</tr>
<tr>
<td>CRI</td>
<td>Committee on Research Integrity</td>
</tr>
<tr>
<td>DCM</td>
<td>Division of Comparative Medicine</td>
</tr>
<tr>
<td>Effort</td>
<td>The amount of work that an individual is compensated by WUSTL, regardless of the number of hours worked.</td>
</tr>
<tr>
<td>Effort Certification</td>
<td>Per Federal requirements, all effort applied to Federally-sponsored contracts or grants are verified after the fact to see that effort reasonably reflects the planned distribution of pay.</td>
</tr>
<tr>
<td>TERM</td>
<td>DEFINITION</td>
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</tr>
<tr>
<td>Effort Reporting</td>
<td>Process by which an individual confirms that the salaries charged to sponsored projects are reasonable in relation to the work performed.</td>
</tr>
<tr>
<td>EH&amp;S</td>
<td>Environmental Health and Safety</td>
</tr>
<tr>
<td>ESCRO</td>
<td>Embryonic Stem Cell Research Oversight Committee</td>
</tr>
<tr>
<td>Ethics</td>
<td>Thinking systematically about morals and conduct; making judgments about right and wrong; guidelines for action that draw on what is right or wrong; beyond talk and thinking to performance and action.</td>
</tr>
<tr>
<td>Federal False Claims Act</td>
<td>Allows private citizens to file a lawsuit in the name of the US Government charging fraud by government contractors and others who receive or use government funds and share in any money recovered. This is referred to as qui tam.</td>
</tr>
<tr>
<td>GAO</td>
<td>US General Accountability Office</td>
</tr>
<tr>
<td>Grant</td>
<td>In general terms, awards given to the university for a specific purpose to support instruction, research or public service. A grant is also a specific type of award (as opposed to contract or cooperative agreement). In this context, a grant is a pledge of support where the sponsor has little involvement in conducting the project.</td>
</tr>
<tr>
<td>Grant Administrator</td>
<td>University employees that help manage the sponsored project</td>
</tr>
<tr>
<td>Grant/Contract Officer</td>
<td>Sponsor's employee that is officially responsible for the project's business management.</td>
</tr>
<tr>
<td>Grantee</td>
<td>The recipient of a grant. When the university accepts a grant award on behalf of an individual the university becomes the grantee.</td>
</tr>
<tr>
<td>HIPAA</td>
<td>Health Insurance Portability and Accountability Act of 1996</td>
</tr>
<tr>
<td>HRPO</td>
<td>Human Research Protection Office</td>
</tr>
<tr>
<td>HR QA/QI</td>
<td>Human Research Quality Assurance/Quality Improvement Program</td>
</tr>
<tr>
<td>Human Subject</td>
<td>Living individual from which an investigator conducting research obtains data through intervention or interaction with the individual</td>
</tr>
<tr>
<td>IACUC</td>
<td>Institutional Animal Care and Use Committee.</td>
</tr>
<tr>
<td>IBC</td>
<td>Institutional Biological and Chemical Safety Committee. The WUSTL IBC is administered by Environmental Health &amp; Safety.</td>
</tr>
<tr>
<td>TERM</td>
<td>DEFINITION</td>
</tr>
<tr>
<td>------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Identifiable Information</td>
<td>Information from which the identity of the subject is or may be readily ascertained or associated.</td>
</tr>
<tr>
<td>Informed Consent</td>
<td>The voluntary agreement obtained from a subject (or the subject’s legally authorized representative) to participate in research or related activity, before participating in that activity. The consent must permit the individual (or legally authorized representative) to exercise free power of choice without undue inducement or any element of deceit, fraud, force, duress, or other form of coercion or constraint.</td>
</tr>
<tr>
<td>Intellectual Property</td>
<td>A broad term that encompasses the various intangible products of the intellect of inventors. These include patents, trademarks, copyrights, trade secrets, know-how, and other proprietary concepts, including an invention, scientific or technological development, and even computer software and genetically engineered microorganisms.</td>
</tr>
<tr>
<td>Internal Control</td>
<td>Broadly defined as a process, established by an entity’s board of directors, management, and other personnel, designed to provide reasonable assurance regarding achievement of objectives in the following categories: effectiveness and efficiency of operations, reliability of financial reporting, compliance with applicable laws and regulations.</td>
</tr>
<tr>
<td>Invention</td>
<td>A patentable invention is any new and useful process, machine, article of manufacture, or composition of matter, or new and useful improvement thereof (35 United States Code 101).</td>
</tr>
<tr>
<td>Inventor</td>
<td>Employee who produces a development that must be disclosed to the Office of Patents &amp; Technology Marketing in accordance with the Regents’ Patents and Technology Transfer Policy.</td>
</tr>
<tr>
<td>IP</td>
<td>Intellectual property</td>
</tr>
<tr>
<td>IRB</td>
<td>Institutional Review Board</td>
</tr>
<tr>
<td>JROC</td>
<td>Joint Research Office of Contracts</td>
</tr>
<tr>
<td>Key Personnel</td>
<td>Term used by Washington University to describe individuals who are responsible for the “design, conduct or reporting of research.” The Principal Investigator, and any other individual identified by the PI on a sponsored research project, is included in this category.</td>
</tr>
<tr>
<td>License</td>
<td>Legal permission from a patent owner to practice an invention. The license term is negotiated with the licensee.</td>
</tr>
<tr>
<td>Material Transfer Agreement</td>
<td>Legal contracts stating conditions under which a proprietary research material is being transferred from one institution or company to another.</td>
</tr>
<tr>
<td>TERM</td>
<td>DEFINITION</td>
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<tr>
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</tr>
<tr>
<td>MTA</td>
<td>Material Transfer Agreement</td>
</tr>
<tr>
<td>Office of Research Integrity</td>
<td>Federal office that promotes integrity in biomedical and behavioral research, supported by the Public Health Service (PHS).</td>
</tr>
<tr>
<td>OGC</td>
<td>Office of General Counsel</td>
</tr>
<tr>
<td>OMB</td>
<td>Office of Management and Budget</td>
</tr>
<tr>
<td>OMB Circular A-21</td>
<td>Principles for determining costs applicable to grants, contracts, and other agreements with educational institutions. This document establishes uniform regulations that the University must follow in regards to determining costs applicable to grants, contracts, and agreements with other institutions. Each Federal agency applies these laws in its own regulations that are listed in the Code of Federal Regulations (CFR) and explained in its policy handbook (if it has one). The OMB Circular is the backbone of agency regulations; the agency cannot impose regulations that are inconsistent with the Circular or impose additional requirements.</td>
</tr>
<tr>
<td>ORI</td>
<td>Office of Research Integrity</td>
</tr>
<tr>
<td>OSRS</td>
<td>Office of Sponsored Research Services</td>
</tr>
<tr>
<td>OTM</td>
<td>Office of Technology Management</td>
</tr>
<tr>
<td>OVCR</td>
<td>Office of the Vice Chancellor for Research</td>
</tr>
<tr>
<td>Patent</td>
<td>A grant of property by the United States government to the inventor giving the owner of the patent the right to exclude others from making, using, offering for sale, or selling the invention in the US or importing it to this country. A US patent is granted for 20 years.</td>
</tr>
<tr>
<td>PI</td>
<td>Principal Investigator</td>
</tr>
<tr>
<td>Principal Investigator</td>
<td>The individual primarily responsible for a research grant, animal research protocol, cooperative agreement, training project, contract, or other sponsored agreement. The Principal Investigator is accountable for the design, direction, oversight, conduct, successful completion, and reporting of the sponsored project, and for managing any collaborative relationships.</td>
</tr>
<tr>
<td>Proprietary Research</td>
<td>Research sponsored by non-governmental entity or individual that involves restrictions on the distribution or publication of the research findings or results following completion, for a specified period or for indefinite duration.</td>
</tr>
<tr>
<td>Protocol</td>
<td>The methodology used in conducting a research project.</td>
</tr>
<tr>
<td>TERM</td>
<td>DEFINITION</td>
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<tr>
<td>------------</td>
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<tr>
<td>RCR</td>
<td>Responsible Conduct of Research</td>
</tr>
<tr>
<td>RECO</td>
<td>Research Ethics and Compliance Office</td>
</tr>
<tr>
<td>REI</td>
<td>Research Education and Information</td>
</tr>
<tr>
<td>RIO</td>
<td>Research Integrity Officer</td>
</tr>
<tr>
<td>Site Visit</td>
<td>An agency-initiated review of a project conducted at the applicant’s institution</td>
</tr>
<tr>
<td>SPA</td>
<td>Sponsored Projects Accounting</td>
</tr>
<tr>
<td>VCR</td>
<td>Vice Chancellor for Research</td>
</tr>
<tr>
<td>UCO</td>
<td>University Compliance Office</td>
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<td>University Compliance Office</td>
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</tbody>
</table>

**Responsible Conduct of Research**

The commitment to and application of shared values, such as honesty, accuracy, efficiency, and objectivity, in professional research settings.

**Sponsored Project**

A project supported by an external funding source under a mutually binding agreement that restricts the use of funds to the approved project and stipulates other conditions with which the university must comply.
Becker Medical Library
Tel: 314.362.7080 | Campus Box 8132 | Web: http://becker.wustl.edu

Center for Applied Research Sciences
Tel: 314.747.4000 | Campus Box 8009 | Eml: ccs@wusm.wustl.edu

Committee on Research Integrity
Tel: 314.747.5571 | Campus Box 1054 | Eml: reco@wusm.wustl.edu

Conflicts of Interest Review Committee
Tel: 314.362.2709 | Campus Box 1054 | Eml: coi@wustl.edu

Contracts and Subagreements – See Joint Research Office for Contracts

Division of Comparative Medicine
Tel: 314.362.3700 | Campus Box 8061 | Eml: aebelb@dcm.wustl.edu

Environmental Health and Safety
Tel: 314.362.6816 | Campus Box 1010 | Eml: ehs@wustl.edu

Grants & Contracts – See Office of Sponsored Research Services

HIPAA Privacy Office
Tel: 314.747.4975 | Campus Box 8098 | Eml: hipaa@wusm.wustl.edu
Toll Free: 866.747.4975

HIPAA Information Security Office
Tel: 314.747.2955 | Campus Box 8218 | Eml: infosec@wusm.wustl.edu

Human Research Protection Office
Tel: 314.747.6800 | Campus Box 8089 | Web: http://hrpo.wustl.edu

Human Research Quality Assurance/Quality Improvement Program
Tel: 314.747.5526 | Campus Box 1054 | Eml: morrisam@wustl.edu
Institutional Animal Care and Use Committee
Tel: 314.362.3229 | Campus Box 1054 | Eml: iacuc@wustl.edu

Institutional Biological and Chemical Safety Committee
Tel: 314.362.6816 | Campus Box 8229 | Eml: ehsibc@wustl.edu

Joint Research Office of Contracts
Tel: 314.747.5393 | Campus Box 1054 | Web: http://osrs.wustl.edu

Office of Physician Billing Compliance
Tel: 314.747.7661 | Campus Box 8041 | Web: http://opbc.wustl.edu

Office of Sponsored Research Services
Tel: 314.747.4134 | Campus Box 1054 | Web: http://osrs.wustl.edu

Office of Technology Management
Tel: 314.747.0920 | Campus Box 8013 | Eml: otm@dom.wustl.edu

Office of the Vice Chancellor for Research
Tel: 314.747.0515 | Campus Box 8106 | Eml: ovcinfo@wustl.edu

Radiation Safety Committee
Tel: 314.362.3476 | Campus Box 8053 | Eml: rad safety@wustl.edu

Radioactive Drug Research Committee
Tel: 314.362.2809 | Campus Box 8223 | Eml: siegelb@mir.wustl.edu

Research Administration Services
Tel: 314.747.6253 | Campus Box 1054 | Eml: tsvirkom@wusm.wustl.edu

Research Education and Information
Tel: 314.362.2709 | Campus Box 1054 | Eml: rei@wusm.wustl.edu

Research Ethics and Compliance Office
Tel: 314.362.2709 | Campus Box 1054 | Eml: reco@wusm.wustl.edu

Sponsored Projects Accounting
Tel: 314.935.7089 | Campus Box 1034 | Eml: jgindhart@wustl.edu

University Compliance Office
Tel: 314.362.4910 | Campus Box 8016 | Eml: universitycompliance@wustl.edu
Washington University is committed to the highest ethical and professional standards of conduct as an integral part of its mission, the promotion of learning. To achieve this goal, the University relies on each community member’s ethical behavior, honesty, integrity, and good judgment. Each community member should demonstrate respect for the rights of others. Each community member is accountable for his/her actions.

- Excerpt from the Washington University Code of Conduct
Animal Studies
Authorship and Publication Standards
Clinical Trials
Code of Conduct
Compliance Profile and Education
Effort Reporting
Environmental Health and Safety
Export Controls
Health Information Portability and Accountability Act (HIPAA)
Human Embryonic Stem Cell Research
Human Research
Intellectual Property
Public Access
Research Conflicts of Interest
Research Integrity
Responsible Conduct of Research
Sponsored Projects