

Statement Regarding Policies and Procedures for NSF Award Compliance

Introduction

Northeastern University is committed to the highest standards of integrity and to lawful and ethical conduct in all of its endeavors. As set forth in the Code of Ethical Conduct adopted by the Board of Trustees on March 21, 2014, “*Northeastern University encourages and expects all members of the community to conduct themselves according to the highest ethical standards. All of our endeavors – research, academic, business, athletic, community relations and student affairs – must be grounded in ethical principles, conducted according to the utmost standards of integrity, and carried out in compliance with legal and regulatory requirements and university policies.*” Accordingly, the University develops, maintains and publishes policies setting forth required standards for its academic, business and other undertakings on a central Policy Webpage. In addition, the University’s overall Compliance Program is designed to foster a culture of compliance and to provide an effective framework for deterring and detecting wrongdoing.

Research and Sponsored Activities, and NSF Award Compliance

The University’s policies that promote and enforce compliance with laws, regulations and University programs, protocols and procedures pertaining to research and sponsored activities can be accessed from both the [Policy Webpage](#) and the website for the [Office of Research Administration and Finance \(ORAF\)](#). The University also has implemented an **NSF Award Compliance Program** to reiterate, emphasize and publicize its commitment to ensure compliance with all laws and regulations related to the receipt of NSF awards. As with Northeastern’s overall Compliance Program, the key components of the NSF Award Compliance Program are:

- Oversight by senior leadership
- Due diligence in delegating substantial discretionary authority to promote appropriate oversight when assigning compliance responsibilities
- Maintaining clear roles and compliance responsibilities for all parties
- Effective and timely training and communication of standards, procedures, internal controls and responsibilities throughout the University community, including through written policies and procedures
- Regular risk assessment and examination of research activities to identify and mitigate compliance risk
- Monitoring and reporting suspected wrongdoing or violations, including a system to report concerns anonymously without fear of reprisal
- Reasonable steps to promptly investigate and respond to violations and to implement steps to prevent further similar offenses and
- Consistent enforcement of compliance standards, including disciplinary mechanisms

NSF Award Compliance Program Governance

The President of Northeastern has appointed the Senior Vice Provost for Research and Graduate Education as the Compliance Officer responsible for implementation of the NSF Award Compliance Program. He chairs a Compliance Oversight Committee made up of senior-level and other personnel with interest in and experience with federal and NSF award administration requirements. In addition to the Compliance Officer, the current members of the Committee are the Provost and Senior Vice President of Academic Affairs, Senior Vice President for Finance and Treasurer, and Senior Vice President and General Counsel. The Committee regularly seeks input from faculty, researchers and Deans of the Colleges.

In addition, there is an operations committee that was formed to carry out specific aspects of implementation of the NSF Award Compliance Plan, at the behest of the Compliance Oversight Committee. The operations committee comprises representatives from ORAF, Compliance, Finance, and the Office of the General Counsel.

Specific Policies and Procedures

Northeastern University's research compliance activities rely on the combined efforts of researchers, support staff, study participants, and others, as well as collaboration among departmental, collegiate, and central units.

All Principal Investigators, researchers, grants administrators and other Northeastern employees who are responsible for the design, conduct, administration or other activity funded or supported by NSF awards, must familiarize themselves and comply with relevant research policies and procedures, including but not limited to:

- [Code of Ethical Conduct](#)
- [Policy on Effort Reporting](#)
- [Policy on Costs for Sponsored Agreements](#)
- [Policy on Cost Sharing](#)
- [Procedures for sub-recipient monitoring](#)
- [Policy on Use of University Funds](#)¹
- [Policy on Retention and Disposition of University Records](#)

The University's goal is to provide the information, support, and systems of administration needed to meet the laws, rules, and policies governing research in the most efficient and effective way. The University designed its compliance program to be proactive, transparent, and integrated to prevent problems before they happen without impairing research.

¹ Supersedes Policy on Budget Reconciliation

Consequences for Violations of the policies and procedures related to NSF Award Compliance

The consequences for violations of these policies, and related laws or regulations, may be severe and can include disciplinary action, up to and including termination or separation; termination of a funded project and/or loss of funding; and/or civil or criminal actions, fines, and penalties.

Reporting a Compliance Concern or suspected violation

Anyone who has a compliance concern or suspects a violation related to an NSF Award or compliance requirement should not hesitate to tell the Compliance Officer for the NSF Award Compliance Program (currently the Senior Vice Provost for Research and Graduate Education). You may also contact the Compliance Department. Alternatively, the University also has a mechanism in place for anonymous and confidential reporting of concerns: a compliance hotline that is managed by an outside company. To learn more about the hotline or to anonymously report a concern, [click here](#).

To report suspected fraud, waste or abuse in NSF contracts and awards, you may call the NSF hotline at 800-428-2189, or contact the Office of the Inspector General at OIG@NSF.GOV.

The University will not tolerate retaliation against anyone who makes a good faith report of suspected or actual wrongdoing.