
	OFFICE OF RESEARCH AND SPONSORED PROGRAMS <i>Division of Research Compliance</i>		Research Compliance Standard Operating Procedures	
	Title: Pre-Compliance Spending Requests			
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PURPOSE

This Standard Operating Procedure (SOP) defines procedures the Research Compliance Unit (RCU) within the Office of Research and Sponsored Programs (ORSP) will follow to review and approve any pre-compliance spending requests for activities that do not require research compliance oversight. This simple procedure will allow the release of some grant funds before research compliance approvals are in place.

SCOPE

This SOP delineates systematic process activities and functions for compliance with ORSP’s policies and procedures and for compliance with the Office of Research Administration’s (ORA’s) policies and procedures. It applies to all SHSU awards (both internal and external) that will require some form of research compliance oversight (e.g., IRB, IACUC, IBC, drones) as determined by the RCU.

DEFINITIONS AND ABBREVIATIONS

1. Definitions:
 - 1.1. Institutional Animal Care and Use Committee- the university committee that is responsible for oversight of SHSU’s animal care and use program for teaching and research.
 - 1.2. Institutional Biosafety Committee- the university committee that is responsible for review and oversight of all research utilizing recombinant or synthetic nucleic acid molecules and other biohazardous materials.
 - 1.3. Institutional Review Board- the university committee that is responsible for oversight of SHSU’s human research protection program.
 - 1.4. Office of Research Administration- SHSU’s post-award office that is responsible for managing all awards on behalf of the PI.
 - 1.5. Office of Research and Sponsored Programs- SHSU’s pre-award office that is responsible for assisting PIs in all phases of the grant submission process up to and including research compliance submission and approvals, contract negotiations, and intellectual property.

- 1.6. Principal Investigator- The primary individual responsible for the preparation and conduct of a research grant, sponsored project, or human subjects research study, in compliance with applicable laws, regulations, and institutional policy governing the conduct of research.
- 1.7. Research Compliance Unit- the unit within the ORSP that is responsible for assisting PIs with all IRB, IACUC, IBC, and drone submission and approval processes.
2. Abbreviations:
 - 2.1. Co-PI: Co-Principal Investigator
 - 2.2. CRO: Chief Research Officer
 - 2.3. IACUC: Institutional Animal Care and Use Committee
 - 2.4. IBC: Institutional Biosafety Committee
 - 2.5. IRB: Institutional Review Board
 - 2.6. ORA: Office of Research Administration
 - 2.7. ORSP: Office of Research and Sponsored Programs
 - 2.8. PI: Principal Investigator
 - 2.9. RCU: Research Compliance Unit
 - 2.10. SHSU: Sam Houston State University

RESPONSIBILITIES

This SOP is applicable to all SHSU Principal Investigators performing activity associated with a funded project that may require some level of research compliance oversight.

PROCEDURE

1. Before receiving research compliance approvals, requests for pre-compliance spending may be considered. Such spending encompasses activities like protocol development, preparation for compliance submissions, organizational meetings, travel related to pre-experimentation and planning, establishment of research facilities, equipment procurement, recruitment of student or other study support personnel, and their training. This approval is contingent upon sponsor stipulations and compliance regulations dictating the permissible expenditure prior to the grant start date.
2. All pre-compliance spending requests will be assessed on a case-by-case basis and infrequently determined to be the best course of action.
3. Principal Investigator (PI) Responsibilities
 - 3.1. Request an assessment to determine if the awarded project is eligible for pre-compliance spending by completing and submitting the [Pre-Compliance Spending Request Form](#).
 - 3.2. Complete all fields on the form, including an explanation of what spending will occur.
 - 3.3. Using the Excel budget hyperlinked in the 'Pre-Compliance Spending Request Form' the PI will be required to detail the pre-compliance funding requested using standard cost categories. Note that if the request is for pre-compliance spending for an internal grant, the PI must ensure indirect costs are not factored into the budget form.
 - 3.4. Each category should have line items for detailed information – name of PI, Co-PI, student, travel detail, consumable detail, etc.

- 3.5. Include a dollar amount for each line item and use column M to provide a justification statement next to each line item that clarifies that the use will not involve areas requiring compliance approval.
- 3.6. Attached the completed budget to the Microsoft form.
- 3.7. Submit the Microsoft form.
4. ORSP/ORA Responsibilities
 - 4.1. The Research Compliance unit will receive the completed Microsoft form request, which will be reviewed before routing it to the Chief Research Officer (CRO in ORSP).
 - 4.2. Once received, the CRO will assess the request to determine if the project is eligible for pre-compliance spending to be released.
 - 4.3. If the project is deemed eligible for pre-compliance spending, the CRO will contact ORA to confirm that the requested pre-compliance funding can be released before research compliance approvals are in place.
5. Research Compliance Approvals
 - 5.1. Once the awarded project reaches the stage in which research compliance oversight approvals are needed, the PI must work with the Research Compliance Specialist to complete all relevant compliance procedures before the remainder of the award is released to the PI.

REFERENCES

ORSP Policies and Procedures
ORA Policies and Procedures

APPENDICES

ORSP Pre-Compliance Spending Request Form