



# Environmental Health & Safety

## Policy & Procedure # 31

**TITLE**

**EH&S Compliance Requirements for Sponsored Projects**

**OBJECTIVE AND PURPOSE**

Many grant funding agencies require institutions to certify, among other things, the grant recipient is in compliance with health & safety policies, procedures and regulations before the funding agency will award funds to the institution. Some grant funding agencies (DOD, CDC, etc.) will also conduct their own site inspections to determine compliance with applicable policies, procedures and regulations.

This policy and procedure applies to all sponsored projects involving regulated activities as specified in Attachment "A." The purpose of this policy and procedure is to ensure well-defined health & safety policies and procedures, compliance assistance programs, sponsored project reviews, safety training, and workplace inspections are in place at FAU in order to comply with institutional and governmental health and safety requirements.

Upon notification of an award of funding, Sponsored Programs will request EH&S conduct a compliance status review of the principal investigator(s), or grantee(s) awarded sponsored funding. The review will include a determination as to whether the proposed project can be completed safely given the availability of appropriate facilities and equipment. The review may not necessarily be limited to the scope of the sponsored project triggering the compliance status review. Additional compliance requirements may apply, depending on the nature of other work conducted by the principal investigator(s) or grantee(s). EH&S shall conduct the compliance status review and report its findings to Sponsored Programs as soon as possible.

**RESPONSIBILITY**

**ACTION**

**ENVIRONMENTAL HEALTH AND SAFETY**

- ◆ Upon request of Sponsored Programs, conduct compliance status reviews of sponsored projects for compliance with applicable institutional and governmental health and safety requirements.
- ◆ Request additional information from appropriate parties as needed in order to conduct compliance status reviews.
- ◆ Notify Sponsored Programs as to the compliance status of sponsored projects, including a listing of deficiencies, if any.
- ◆ Track status of compliance reviews and seek status updates from PI's/Grantees as needed.
- ◆ Assist Sponsored Programs, principal investigators, and/or grantees in complying with institutional and governmental health and safety requirements.
- ◆ Provide Sponsored Programs with a compliance requirements memorandum (Attachment "A") for its use in notifying principal investigators or grantees of regulated activities.
- ◆ Update the compliance requirements memorandum as needed.

Issued By: Bradley	Date Issued: 08/26/13	Date Revised:	Effective Date: 08/26/13
APPROVED:	Vice President	Associate V.P.	Director

**SPONSORED PROGRAMS**

- ◆ At the time a sponsored project is awarded funding, determine whether a compliance status review is required by EH&S.
- ◆ If required, forward the scope of work, budget, and/or other documents related to such sponsored projects to EH&S, and request a compliance status review.
- ◆ Relay any compliance deficiencies identified by EH&S to the principal investigator(s) or grantee(s) with a request to correct those deficiencies prior to release of funds.
- ◆ Track status of compliance reviews and seek status updates from EH&S as needed.
- ◆ Withhold release of funds until a notification of satisfactory compliance status review is received from EH&S.

**PRINCIPAL INVESTIGATORS / GRANTEES**

- ◆ Comply with institutional and governmental health and safety requirements at all times.
- ◆ Correct any compliance deficiencies identified as soon as possible.
- ◆ Report corrected deficiencies to Sponsored Programs and/or EH&S.
- ◆ Seek health and safety compliance assistance from EH&S when needed.

**REFERENCE**

- ◆ University Policy 4.1.2 - University Environmental Health and Safety

**ATTACHMENTS**

- ◆ ***EH&S Compliance Requirements for Sponsored Projects – Attachment “A”***

## **Attachment “A” – EH&S Compliance Requirements for Sponsored Projects**

To:

From: Director of Environmental Health & Safety

Date:

Re: EH&S Compliance Requirements for Sponsored Projects

---

Your project calls for compliance with institutional and governmental health and safety requirements in one or more of the areas listed below. When an award is made, a compliance status review will be conducted. If deficiencies are noted, funds will not be released until the deficiencies are corrected. For more information, or if you have any questions, please see the web sites listed below and/or contact EH&S at 561-297-3129.

1. If your project involves the use of Biological Agents, Select Agents, or Recombinant DNA:  
([www.fau.edu/facilities/ehs/safety/biological-safety-programs.php](http://www.fau.edu/facilities/ehs/safety/biological-safety-programs.php))  
Has the project been reviewed and approved by the Institutional Biosafety Committee (IBC)?  
Are the PI and all staff up to date with required training, medical monitoring, and inspections?
2. If your project involves the use of Radioactive Material, X-Rays or Lasers:  
([www.fau.edu/facilities/ehs/safety/Rad-Safety-Program.php](http://www.fau.edu/facilities/ehs/safety/Rad-Safety-Program.php))  
Has the project been reviewed and approved by the Radiation Safety Committee (RSC)?  
Are the PI and all staff up to date with required training, personnel monitoring, and inspections? Are required radioactive materials inventories up to date?
3. If your project involves Diving, Snorkeling or the use of Boats:  
([www.fau.edu/facilities/ehs/safety/diving-boating-safe-programs.php](http://www.fau.edu/facilities/ehs/safety/diving-boating-safe-programs.php))  
Has the project been approved by the Diving and Boating Safety Officer and the Diving and Boating Safety Committee, if necessary?  
Are the PI and all staff up to date with required training, certifications, medical monitoring, equipment and vessel inspections?
4. If your project involves the use of Hazardous Chemicals or Nanomaterials:  
([www.fau.edu/facilities/ehs/safety/chemical-safety-programs.php](http://www.fau.edu/facilities/ehs/safety/chemical-safety-programs.php))  
Are the PI and all staff up to date with required training, medical monitoring and inspections? Are chemical inventories up to date? Are engineering controls in place to reduce exposures?
5. If your project involves the production of flame, smoke or heat or any combination of the three:  
([www.fau.edu/facilities/ehs/safety/fire-safety-program.php](http://www.fau.edu/facilities/ehs/safety/fire-safety-program.php))  
Has the project and the location of the project been approved by the Fire Safety Officer?
6. If your project involves the use of chartered Helicopters or Airplanes:  
(<http://www.fau.edu/facilities/uavp/policies-folder/UAVP30-Charter-Aircraft.pdf>)  
Contact Gene Young, University Risk Manager, 561-297-1177, [cyoung39@fau.edu](mailto:cyoung39@fau.edu)
7. If your project will be funded by the Federal Emergency Management Agency:  
Contact Sharlene Sookhoo, EH&S Emergency Management Coordinator, 561-297-2889, [ssookhoo@fau.edu](mailto:ssookhoo@fau.edu)
8. If your project involves field work:  
Contact Tom Bradley, Director of EH&S, 561-297-3106, [tbradley@fau.edu](mailto:tbradley@fau.edu)