



Office of Research Compliance and Administration Proposal Submission Transmittal

PI:		Department:	
Bldg/Rm Mail Stop:	Phone:	Fax:	Email:
Other contact name/phone/email:			
Project Title:			
Project Start Date:		Project End Date:	
Sponsor:			
Is this pass thru funding? Yes No		If pass-thru, who is the prime sponsor?	
Sponsor submission deadline (if applicable):			

Action:	New		Non-Competing Renewal		Transfer-In	
	Competing Renewal		Supplement		Recurring Contract	
	Is this a resubmission?	Yes No	Is this a revision?	Yes No		

Required Attachments			Optional Attachments		
Project Solicitation:	Yes	No	Is there Cost Sharing?:	Yes	No
Project Abstract:	Yes	No	Indirect Cost Waiver:	Yes	No
Project Budget:	Yes	No	All Co I's must complete a conflict of interest form.		
Conflict of Interest:	Yes	No	Number of CoI's on this project:		

Location of project:	on-campus	off-campus	Are Compliance Protocols required?:		
Bldg and room#:			Humans	Yes	No
Does the space need renovation?:	Yes	No	Animals	Yes	No
Do you need additional space?:	Yes	No	Ionizing Radiation	Yes	No
Will this project use Tenet Hospital facilities?:	Yes	No	Biohazards	Yes	No
Tenet facility name(s):					

ITAR/EAR/etc.			
Is this proposal subject to export controls?:	Yes	No	Don't Know

For Office of Research Use:		
Project #	Date Proposal Submitted to Sponsor:	IC Rate:



Office of Research Compliance and Administration Certifications

Project Title:

Certifications: By signing this form, I certify that I have read the following statements and I further certify that the statements contained therein are accurate and truthful to the best of my knowledge and belief.

The information submitted within the application is true, complete and accurate to the best of the Principal Investigator's knowledge.

Any false, fictitious, or fraudulent statements or claims may subject the Principal Investigator to criminal, civil, or administrative penalties.

The Principal Investigator agrees to accept responsibility for the scientific conduct of the project and to provide the required progress reports if a grant is awarded as a result of the application.

The Principal Investigator agrees to conduct the project in accordance with the terms and conditions of the sponsoring agency, the policies of the University and all applicable federal circulars and regulations.

The Principal Investigator will be fully responsible for meeting the requirements of the award, including providing the proper stewardship of sponsored funds, submitting all required technical reports and deliverables on a timely basis, and properly disclosing all inventions to the Office of Research Compliance and Administration, in accordance with Federal policy or contractual terms.

The Principal Investigator agrees to follow procedures consistent with University policies regarding the use of human subjects, animals, ionizing radiation, biohazards, toxins and pathogens in the conduct of the subject project.

I have read and understood the University's Conflict of Interest in Research Policy. Attached are the completed Conflict of Interest certifications for all investigators.

Print Name	Signature	Department	Date	Distribution of Credit (%)
Principal Investigator:	_____	_____	_____	_____
*Co-Investigator:	_____	_____	_____	_____
*Co-Investigator:	_____	_____	_____	_____
*Co-Investigator:	_____	_____	_____	_____
*Co-Investigator:	_____	_____	_____	_____
Department Head:	_____	_____	_____	
Department Head:	(signature required for each Co-I)	_____	_____	Total Distribution must equal 100%
Department Head:	(signature required for each Co-I)	_____	_____	
Department Head:	(signature required for each Co-I)	_____	_____	
Dean/School Director:	(signature required for each Co-I)	_____	_____	
Dean/School Director:	(signature required for each Co-I)	_____	_____	
Office of Research:	_____	_____	_____	_____

*** If you are a co-investigator, your chair and dean must sign.**



Project Specific Conflict Of Interest

PRINCIPAL INVESTIGATOR: _____
(Print or Type)

SIGNATURE OF INVESTIGATOR: _____

PROJECT TITLE: _____

SPONSOR: _____ DATE: _____

The undersigned certifies, to the best of his/her knowledge and belief, that the following questions are answered correctly:

Does the undersigned or his/her immediate family, as defined by the University's Policy on Conflicts of Interest and Commitment in Research have:

- | | | |
|---|-----|----|
| 1. A significant financial interest in the sponsor of the proposed research project in which he/she is involved (current or pending) | YES | NO |
| 2. A significant financial interest in other entities whose financial interests would reasonably appear to be affected by the outcome of research | YES | NO |

Please answer each: YES NO

- A. Any ownership interest in excess of 5% of the voting interest or in excess of \$10,000 of the fair market value, regardless of means by which acquired in a publicly traded company (excluding any interest arising solely by reason of investment in a business by a mutual, pension, or other institutional investment fund over which the investigator or his/her immediate family does not exercise control)?
- B. Any ownership interest in a privately held company?
- C. A position held by the investigator or his/her immediate family as employee, director, officer, partner, or any position of management?
- D. Income (e.g., consulting, salary to the investigator or his/her immediate family) of \$10,000 or more, received or promised within a 12-month period?
- E. Any loan to the investigator or his/her immediate family?
- F. Gifts with a value of more than \$100 within a 12-month period?

If you have answered yes to one or more question listed above. A [financial disclosure form](http://research.drexel.edu/administration/Forms_Facts/docs/COI_Part2.pdf) located at http://research.drexel.edu/administration/Forms_Facts/docs/COI_Part2.pdf must be completed and returned to the Office of Research for further review.

Entity With Which There Is Financial Interest:

Submission of this certification is mandatory with each research project for all investigators as defined by the University's Policy on Conflict of Interest and Commitment in Research.



Project Specific Conflict Of Interest

CO- INVESTIGATOR: _____
(Print or Type)

SIGNATURE OF CO-INVESTIGATOR: _____

PROJECT TITLE: _____

SPONSOR: _____ DATE: _____

The undersigned certifies, to the best of his/her knowledge and belief, that the following questions are answered correctly:

Does the undersigned or his/her immediate family, as defined by the University's Policy on Conflicts of Interest and Commitment in Research have:

- | | | |
|---|-----|----|
| 1. A significant financial interest in the sponsor of the proposed research project in which he/she is involved (current or pending) | YES | NO |
| 2. A significant financial interest in other entities whose financial interests would reasonably appear to be affected by the outcome of research | YES | NO |

Please answer each: YES NO

- A. Any ownership interest in excess of 5% of the voting interest or in excess of \$10,000 of the fair market value, regardless of means by which acquired in a publicly traded company (excluding any interest arising solely by reason of investment in a business by a mutual, pension, or other institutional investment fund over which the investigator or his/her immediate family does not exercise control)?
- B. Any ownership interest in a privately held company?
- C. A position held by the investigator or his/her immediate family as employee, director, officer, partner, or any position of management?
- D. Income (e.g., consulting, salary to the investigator or his/her immediate family) of \$10,000 or more, received or promised within a 12-month period?
- E. Any loan to the investigator or his/her immediate family?
- F. Gifts with a value of more than \$100 within a 12-month period?

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Entity With Which There Is Financial Interest:

Submission of this certification is mandatory with each research project for all investigators as defined by the University's Policy on Conflict of Interest and Commitment in Research.



Project Specific Conflict Of Interest

KEY PERSONNEL: _____

(Print or Type)

SIGNATURE OF KEY PERSONNEL: _____

PROJECT TITLE: _____

SPONSOR: _____ DATE: _____

The undersigned certifies, to the best of his/her knowledge and belief, that the following questions are answered correctly:

Does the undersigned or his/her immediate family, as defined by the University's Policy on Conflicts of Interest and Commitment in Research have:

- | | | |
|---|-----|----|
| 1. A significant financial interest in the sponsor of the proposed research project in which he/she is involved (current or pending) | YES | NO |
| 2. A significant financial interest in other entities whose financial interests would reasonably appear to be affected by the outcome of research | YES | NO |

Please answer each:

YES NO

- A. Any ownership interest in excess of 5% of the voting interest or in excess of \$10,000 of the fair market value, regardless of means by which acquired in a publicly traded company (excluding any interest arising solely by reason of investment in a business by a mutual, pension, or other institutional investment fund over which the investigator or his/her immediate family does not exercise control)?
- B. Any ownership interest in a privately held company?
- C. A position held by the investigator or his/her immediate family as employee, director, officer, partner, or any position of management?
- D. Income (e.g., consulting, salary to the investigator or his/her immediate family) of \$10,000 or more, received or promised within a 12-month period?
- E. Any loan to the investigator or his/her immediate family?
- F. Gifts with a value of more than \$100 within a 12-month period?

If you have answered yes to one or more question listed above. A [financial disclosure form](http://research.drexel.edu/administration/Forms_Facts/docs/COI_Part2.pdf) located at http://research.drexel.edu/administration/Forms_Facts/docs/COI_Part2.pdf must be completed and returned to the Office of Research for further review.

Entity With Which There Is Financial Interest:

Submission of this certification is mandatory with each research project for all investigators as defined by the University's Policy on Conflict of Interest and Commitment in Research.



Office of Research Compliance and Administration Indirect Cost Waiver Approval Form

Principal Investigator: _____

Project Title: _____

Sponsor: _____

All sponsored project applications must request indirect costs at the University established rates calculated on MTDC or secure a waiver from the following established rates:

<u>Effective Period</u>	<u>Rate (%)</u>	<u>Location</u>	<u>Applicable To</u>
7/1/10-6/30/11	54.0	On-campus	Organized Research
7/1/11-6/30/12	54.5	On-campus	Organized Research
7/1/08-6/30/12	26.0	Off-campus	Organized Research/Instruction/Other Spon Act
7/1/08-6/30/12	50.9	On-campus	Instruction
7/1/08-6/30/12	35.0	On-campus	Other Spon Act
7/1/08-6/30/12	8.5	Off-campus	IPA (Intergovernmental Personnel Act Agreement)

We accept the sponsors published restrictions for indirect cost recovery.

In the space below, provide the rationale for waiving the established indirect rate. If the sponsor restricts indirect rate recovery, attach the sponsors written policy. If the sponsor does not restrict indirect cost recovery, provide the reason for requesting the waiver of the established indirect rate. Submit the completed application to the Office of Research (3201 Arch Street, Suite 100) with the Sponsored Project Application Package.

Do Not Submit Form Unless Indirect Cost Waiver is Requested

Signatures:

Principal Investigator: _____ Date: _____

Department Head: _____ Date: _____

Dean/School Director: _____ Date: _____

Office of Research: _____ Date: _____

Instructions for Export Control Compliance Questionnaire

Drexel engages in research and educational activities that may involve the development or use of products, goods, hardware, software, materials or technology that may be subject to U.S. export control laws and regulations. The U.S. government increasingly is focused on the compliance of universities with these laws and regulations. Drexel is committed to complying with all applicable export controls, as established by the applicable federal regulations. As a result of the severe criminal and civil penalties for noncompliance by Drexel and by individual researchers at Drexel, as well as possible threats to national security, it is critical that everyone in the Drexel community understands these rules and complies with them fully.

This questionnaire will walk you through a series of "Yes" or "No" questions, leading to a determination of whether or not an export control concern may be applicable to any particular situation. Be aware that export controls may apply when an item, information or software is being sent or taken (e.g. traveling with a laptop) outside US borders, OR when it is being shared with "foreign persons or entities" in the US, **including Drexel faculty, staff, and students working on campus.**

A "foreign person" is anyone who is not a "US person." A US person is a citizen of the United States, a lawful permanent resident alien of the US (a "green card holder"), a refugee, protected political asylee or someone granted temporary residency under amnesty or Special Agricultural Worker provisions. The word "person" includes organizations and entities, such as universities. The general rule is that only US persons are eligible to receive export controlled items, information or software without first obtaining an export license from the appropriate agency.

This questionnaire uses terminology derived from the regulations of the US Departments of State, Commerce and Treasury. These questions ask about **sharing, shipping, transmitting or transferring** any **items, information or software**. Violations of these export control regulations can lead to significant civil and criminal penalties.

- ITEMS refer to any **tangible things, equipment or hardware**.
- INFORMATION can include **technical data** such as models, formulae, engineering designs and specifications, or **technical assistance** such as training or instruction.
- SOFTWARE refers to a collection of one or more **computer programs or microprograms** in either **source code** (programming statements) or **object code** (machine-readable instructions).

You are required to answer all questions on the Export Control Compliance Questionnaire. Please find the attached footnotes for your reference as you complete the questionnaire. As you go through these questions, you may have additional questions of your own. If so, please contact Julie Ford, at 215-895-2947 or jjf47@drexel.edu



Office of Research Compliance and Administration Export Control Compliance Questionnaire

Principal Investigator: _____

Project Title: _____

Sponsor: _____

Drexel University is committed to maintaining strict compliance with all US Export Control regulations.
You must read the attached instructions prior to completing all of the questions below.

Drexel's Export Control Policy Statement and Handbook can be accessed here:
http://www.research.drexel.edu/administration/Compliance/Export_Controls.aspx.

Severe criminal and civil penalties for individual researchers and Drexel University may be imposed for export control violations.

Begin each question with:

Are you sharing, shipping, transmitting or transferring an item, information or software (including but not limited to encryption software(1))...

		Yes	No	ORCA only
1	that you know or have any reason to believe will support the design, development, production, stockpiling or use of a nuclear explosive device, chemical or biological weapons, maritime nuclear propulsion end use, or missiles?			
2	developed under a sponsored agreement imposing publication restrictions beyond a brief review (up to 90 days) for patent protection and/or inadvertent release of confidential/proprietary information?			
3	that an external sponsor, vendor, collaborator or other third party has provided to you under a Non-Disclosure Agreement or under a Confidentiality Agreement?			
4	that is a defense article(2) and/or on the ITAR US Munition List (USML) at http://www.pmdtc.state.gov/regulations_laws/documents/consolidated_itar/2009/Part_121.pdf or that is technical data(3) subject to ITAR?			
5	that appears on the Commerce Control List (CCL)(4) at http://www.access.gpo.gov/bis/ear/ear_data.html of the Export Administration Regulations (EAR)(5)?			
6	or anything of value to an entity in a country subject to US economic or trade sanctions (please see: http://www.ustreas.gov/offices/enforcement/ofac/programs/) or identified by the US Department of State as a "State Sponsor of Terrorism," namely Iran, Cuba, Sudan, or Syria?			

IMPORTANT: IF YOU ANSWERED YES TO ANY OF THE QUESTIONS ABOVE, THERE MAY BE AN EXPORT CONTROL CONCERN RELATED TO YOUR PROPOSED ACTIVITY AND A LICENSE MAY BE REQUIRED. PLEASE CONTACT JULIE FORD IN ORCA IMMEDIATELY FOR FURTHER ASSISTANCE AT 215.895.2947 OR JULIA.J.FORD@DREXEL.EDU.

RESTRICTED PARTY SCREENING: In addition to the areas covered above, and by order of the United States government and its export regulations, U.S. individuals and companies are restricted or prohibited from exporting or providing services of any kind to any party contained in U.S. government export denial, debarment, and blocked persons lists. You must provide the names of individuals and companies that you may be working with in connection with your research or other activities on the next page, in order for ORCA to perform the required check.

Signature: _____

Principal Investigator: _____ Date: _____

RESTRICTED PARTY SCREENING LIST

Principal Investigator: _____

Department: _____

Potential Sponsor: _____ Solicitation Attached: Yes / No

In the spaces below, please provide a list of the organizations or companies (including any subcontractors or independent contractors) as well as any individuals (internal or external to Drexel) with whom you will be collaborating or otherwise working on this research project so that ORCA can perform the required restricted party screening check.

For your protection and that of the University, ORCA will screen against relevant U.S. Government lists that prohibit certain transactions with certain organizations and individuals, including Specially Designated Nationals and Blocked Persons (SDN) lists, under the authority of (among others):

- Department of Treasury Office of Foreign Assets Control (OFAC) Sanctions
- Department of Commerce Bureau of Industry and Security (BIS) Denied Persons List
- Department of Commerce BIS Entity List and Unverified List
- Department of State Arms Export Control Act Debarred Parties
- Department of State Designated Terrorist Organizations
- Department of State Nonproliferation Orders

Organizations (and address, if known) to be involved in the Sponsored Project:

1. _____
2. _____
3. _____
4. _____
5. _____

Name and citizenship of all individuals participating in the Sponsored Project:

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____
9. _____
10. _____

Use additional sheet if needed to accommodate more organizations or personnel.

Export Control Questionnaire Footnotes

Note (1)

The sharing, shipping, transmission or transfer of almost all encryption software in either source code or object code is subject to US export regulations. Even most publicly available "dual-use" encryption code captured by the Export Administration Regulations (EAR) requires the availability of a License Exception. A License Exception under the EAR is an authorization based on a set of criteria, which when met, allows the exporter to legally circumvent export licensing requirements. Please contact Julie Ford at 215-895-2947 or by email at jjf47@drexel.edu to help determine if an exception applies to your situation.

In addition, US persons are prohibited without prior authorization from providing technical assistance (i.e., instruction, skills training, working knowledge, consulting services) to a foreign person with the intent to assist in the **overseas** development or manufacture of encryption software that is subject to US Government notification or authorization. This prohibition does **NOT** limit Drexel personnel from teaching or discussing general information about cryptography or developing or sharing encryption code within the United States that arises during, or results from, fundamental research.

Note (2)

A defense article:

1. Is specifically designed, developed, configured, adapted, or modified for a military application, and
 1. does not have predominant civil applications, and
 2. does not have performance equivalent (defined by form, fit and function) to those of an article or service used for civil applications;
2. Is specifically designed, developed, configured, adapted, or modified for a military application, and has significant military or intelligence applicability; or
3. Is on the [US Munitions List](#) (USML, the US State Department ITAR list).

Note (3)

Technical data means:

1. Information, other than software, which is required for the design, development, production, manufacture, assembly, operation, repair, testing, maintenance or modification of defense articles. This includes information in the form of blueprints, drawings, photographs, plans, instructions and documentation.
2. Classified information relating to defense articles and defense services.
3. Information covered by an invention secrecy order.
4. Software directly related to defense articles.

"Technical data" does NOT include information concerning general scientific, mathematical or engineering principles commonly taught in schools, colleges and universities, information in the public domain, or information generated in the course of performing fundamental research. It also does not include basic marketing information on function or purpose or general system descriptions of defense articles.

Note (4)

The Commerce Control List (CCL) is maintained by the Bureau of Industry and Security (part of the US Department of Commerce) as part of the Export Administration Regulations (EAR). This list is sometimes called the "dual use" list, as the items on it may have either a military or commercial application.

Note (5)

The EAR defines "technology" as:

- Specific information necessary for the "development", "production", or "use" of equipment or software. Technology includes information subject to the EAR released in the form of technical assistance or technical data.
 - Technical assistance includes instruction, skills training, working knowledge, consulting services. Technical assistance may involve transfer of export controlled information.
 - Technical data includes blueprints, plans, diagrams, models, formulae, tables, engineering designs and specifications, manuals and instructions written or recorded on other media or devices such as disk, tape, read-only memories.

Information that is, or will be, placed in the public domain, such as that generated by fundamental research, is not subject to the EAR and is exempt from export control regulations.

The EAR defines software code as a collection of one or more programs or microprograms fixed in any tangible medium of expression. Software code is comprised of source code or object code:

Source Code: A convenient expression of one or more processes that may be turned by a programming system into equipment executable form ("object code" or object language).

Object Code: An equipment-executable form of a convenient expression of one or more processes ("source code" or source language) that has been converted by a programming system.