

Policy on Supervision of a Related Party on a Sponsored Program

Definitions

Related Party: For purposes of this policy the term "related party" shall include the following relationships: a parent, spouse, domestic partner, child, sibling, grand-parent, in-law, cousin, uncle or aunt of the Principal Investigator(s) (PI) or Project Director(s) (PD).

Sponsored Program: Any assistance (grant) or acquisition (contract) agreement whether for research or non-research related activities and whether funded by a federal, state, city, county or non-governmental source.

Supervision: Supervision occurs when one Related Party holds the role of PI or PD and the other Related Party holds any other non-consultant role on the Sponsored Program. Supervision does not occur when both Related Parties are PIs as may be the case on a multiple PI grant or when Related Parties both hold non-PD/PI roles. There is a separate policy that covers consultants who are also related parties.

<u>Purpose</u>

This policy is intended to mitigate the inherent risk of a real or apparent conflict of interest or real or perceived favoritism occurring when one Related Party supervises another Related Party on a Sponsored Program while recognizing that in some instances it will be in the best interests of the science and/or programmatic goals that such a relationship occur on a Sponsored Program.

Procedures

- 1) The department must be notified of the specific details of the relationship at or before the time of grant/contract submission.
- If the non-PD/PI Related Party is not listed as personnel on the application itself, he or she should not be added in any capacity at any time without the written authorization of the Departmental Chair or his/her designee.
- 3) If the Related Party relationship is not established until after the submission of the application the relationship must be disclosed to the Department as soon as it is commenced.
- 4) The Departmental Chair or his/her designee (with the exclusion of the Related Party) should/will approve all effort increases, travel requests and other forms of Sponsored Programs reimbursement made to the non-PI/PD related party.
- 5) If the Related Party PD/PI is the Departmental Chair a neutral third party chosen by the Dean should/will carry out the duties of the Departmental Chair or his/her designee.

Related Policies

- <u>Human Resources Policy Manual</u> see section "2.11 Employment of Employee's Relative"
- Sponsored Projects Accounting <u>Consultant Services Purchase Orders and Invoices (155)</u>
- Sponsored Projects Accounting <u>Consultant Services Provided By a Related Party (155A)</u>