



Policy: Mandatory Disclosures for Sponsored Programs	Policy No: S5.I
Policy Developer(s): Office of Sponsored Research	Original Date: May 18, 2018
Last Review Date:	Approval Date: October 17, 2019

- I. **POLICY:** Pursuant to [CFR 45 Part 75.113](#), [CFR 45 Part 75.300](#), [2 CFR Part 200.113](#), and [2 CFR Part 200.300](#) all John Carroll University (“the University”) faculty, staff and students must disclose to the Office of Sponsored Research, in writing and within 14 days of the official action, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting a Federal award or sub-award.
- II. **SCOPE:** This policy applies to all University faculty, staff and students involved in the operations and administration of sponsored programs.
- III. **PROCEDURES:** Such disclosures will be reviewed by the appropriate University officials and, when warranted, promptly reported in writing to the Federal awarding agency or the pass through entity as required by law.
- A. Responsibility:** All Principal Investigators are responsible for ensuring all participants on their federal award comply with this disclosure requirement.
- B. Sanctions:** Failure to make required disclosures can result in any of the remedies described in [2 CFR 200.338 Remedies for Noncompliance](#), including suspension or debarment.
- IV. **CROSS REFERENCES:**
- A. University Policies**, including but not limited to
1. Sponsored Research Policies
 2. Bank Account Reconciliation
- B. Federal Regulations, Statement, and Mandates**
1. [45 CFR 75.113](#)
 2. [45 CFR 75.300](#)
 3. [2 CFR 200.113](#)
 4. [2 CFR 200.338](#)
 5. [HHS Grants Policy Statement](#)
 6. [HRSA Legislative Mandates in Grants Management for FY 2018](#)
 7. [NIH Grants Policy Statement](#)
 8. [NSF Proposal and Award Policies and Procedures Guide](#)

This policy will next be reviewed five years from the date of last review.