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**Issue 8, Summer
2014**

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This newsletter is prepared by the Office of Compliance and is intended to provide you with current information about research compliance issues. For additional information, to view past newsletters, or to provide comments about this or any future issues of this newsletter, please contact the Office of Compliance at (213) 740-8258 or at complian@usc.edu.

NIH Researchers -- Annual Disclosures are Due!

It's that time of year. All investigators who are seeking or have obtained HHS research support must submit their annual update. Please keep in mind the following requirements:

- Any HHS investigator, or anyone who intends to be an investigator on a future proposal to an HHS agency, must submit an annual disclosure **no later than July 31, 2014**.
- Annual disclosures from last year will not be current after July 31, 2014 and must be updated in USC's conflict disclosure system ("diSClose") by that date.
- Any previously disclosed relationships must be updated, regardless of whether there are any changes, with current information.
- Any previously disclosed relationships that are no longer active must be removed.
- As before, only investigators who have submitted their annual disclosure will be permitted to submit new proposals to HHS or access continuation funding on an existing award.
- Disclosures posing potential conflicts of interest will be reviewed by the Conflict of Interest Review Committee (CIRC) in accordance with USC's Conflict of Interest in Research policy.
- Investigators must personally submit their disclosures. Disclosures cannot be delegated to others, who would not be expected to know an investigator's disclosable financial interests.

Conflict of interest training is only required every four years, so no new training is needed if the training has been completed since the regulation went into effect in 2012. For new investigators, more information about training can be found here: <http://ooc.usc.edu/hhs-required-coi-training>

diSClose may be accessed at <https://disclose.usc.edu>. In order to log in, a USC NetID and password are needed. The USC NetID is the first part of the USC e-mail address, and is the same ID used to access other USC applications like Quali, Workday, Blackboard, and myUSC.

If you need any help logging in to diSClose (including your USC NetID or password), please call the Help Desk at (213) 740-5857.

If you have questions, contact the Office of Compliance at (213)

OMB Circular Changes: What Do They Mean For You?

As reported in the [Winter 2014 Research Compliance Newsletter](#), the Office of Management and Budget (OMB) released final guidance titled "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" on December 26, 2013. OMB's goal is to reduce administrative burden and streamline operations and administration of federal awards, while simultaneously strengthening the government's oversight capabilities. The Uniform Guidance is currently scheduled to go into effect on December 26, 2014.

Highlights of the new Circular include:

- Voluntary committed cost sharing is not expected and generally cannot be used as a factor during merit review.
- Purchases greater than \$3,000 must be competitively bid.
- Direct charging of administrative and clerical salaries is appropriate if the salary is integral to the project, the individuals to be charged are specifically identified and included in the budget or have sponsor approval, and the salary is not also recovered as an indirect cost.
- Materials and supplies costs, including the costs of computing devices, may be direct charged, as long as appropriately allocated.

While the Uniform Guidance is final, there is still uncertainty about how agencies will implement many of its provisions, including the highlights listed above. Agency implementation plans were due to OMB on June 26, 2014. In addition, the Council on Governmental Relations (COGR) and the Federal Demonstration Partnership (FDP) continue seek additional guidance from OMB.

In the meantime, we will continue to keep you apprised of updates and the steps you need to take to ensure compliance with A-81's requirements.

International Travel - Do's and Don'ts

University-related travel outside the United States can present a range of legal and safety issues for faculty, staff, and students under United States law and university policy depending on where you are going, who is traveling, what you are taking with you, and who you will be working with on your trip. Some important steps to take include:

- Determine whether there is a US State Department Travel Warning or trade sanctions in place for your destination country.
- Purchase all commercial transportation using a USC Travel Card or through a USC Contract Travel Agency such as STA Travel.
- Do not take any export-controlled documents or software without obtaining an export license.
- Do not offer anything of value to a foreign government official in order to obtain or retain business.
- Protect the security of the electronic information you are taking

with you. This includes strong passwords, virus and spyware protection, and leaving sensitive data at home.

- If you find yourself in an emergency situation, contact USC Travel's Emergency Hotline at (213) 821-1042 for assistance.

The Office of Compliance has prepared more detailed guidance on appropriate steps to take when engaging in international travel. Please contact the Office of Compliance at (213) 740-8258 for additional detail, or for guidance in complying with these measures.

Audit Update - Watch Your Spending!

According to a recent audit report released by the Department of Health and Human Services, Office of Inspector General (HHS OIG), the University of South Florida failed to claim certain costs in accordance with federal regulations and National Institutes of Health guidelines.

In its report, the OIG estimated that the University of South Florida charged \$6.4 million in unallowable transactions and related facilities and administrative costs to HHS awards during fiscal years 2010 and 2011. As a result, the OIG recommended that the University refund \$6.4 million to the federal government and enhance oversight of charges to federal awards.

Even though the OIG eventually reduced the number of unallowable salary and non-salary transactions after the university submitted its response to the OIG's findings, the audit highlights the importance of adhering to federal cost circulars when charging costs to federal awards.

The full report is available at the OIG website: <https://oig.hhs.gov/oas/reports/region4/41201016.asp>

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