

Policy:	Mandatory Disclosures		
Responsible Office:	Office of Sponsored Research	Prepared By:	Erica Kennedy, MBA, CRA Director, Office of Sponsored Research
Approved Date:	05/18/2018	Reviewed By:	James Krukones, PhD Associate Academic Vice President
Last Revised Date:	06/15/2018	Approved By:	Nicholas R. Santilli, PhD Interim Provost and Academic Vice President

Scope

This policy applies to all John Carroll University faculty, staff and students involved in the operations and administration of sponsored programs.

Policy Statement

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 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. 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.

Responsibility

All Principal Investigators are responsible for ensuring all participants on their federal award comply with this disclosure requirement.

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.

Related Information

[45 CFR 75.113](#)

[45 CFR 75.300](#)

[2 CFR 200.113](#)

[2 CFR 200.338](#)

[HHS Grants Policy Statement](#)

[HRSA Legislative Mandates in Grants Management for FY 2018](#)

[NIH Grants Policy Statement](#)

[NSF Proposal and Award Policies and Procedures Guide](#)