



Internal Control Questionnaire

for

Miami University

This document is a combined PDF file containing the completed Internal Control Questionnaire (ICQ), signed by an authorized university official, along with all required attachments.

A Table of Contents follows on the next page.

WSIC Project ID

WSIC26-250206-009

July 31, 2025

Table of Contents

Internal Control Questionnaire	1
Agency Table of Organization	13
Board of Directors List	14
Indirect Cost Rate Agreements	15
Agency Procurement Process/Procedure	19
Time and Effort Reporting	30
Equipment Inventory Procedures	33
IRB Process/Procedure	39
Proof of Coverage/Institutional Assurance	65

Internal Control Questionnaire



Bureau of Workers'
Compensation



Workforce Safety Innovation Grant Internal Control Questionnaire

I. Introduction

1. Form completion date **07/31/2025**

The purpose of the Internal Control Questionnaire (ICQ) is to obtain information about your agency's current internal controls, financial recordkeeping, and reporting procedures or as of your most recently completed fiscal year.

Answer all questions. Attach flowcharts or other documents to substantiate the information you provided.

2. Name of agency **Miami University**

3. Address **501 E. High Street, Oxford, OH 45056-1846**

4. Phone **(513) 529-0454** 5. Fax **_____** 6. Email **wrightwh@miamioh.edu**

7. Project title **SIGHT: Safety Immersion and Gamified Hazard Training for Industry 5.0 Workers**

8. Agency fiscal year (e.g., e.g., 7/1/25 to 6/30/26) **7/1/2025 - 6/30/2026**

9. Agency type (Select from the drop-down list) **Nonprofit University/College**

10. Other (Specify) **_____**

11. Do you have a fiscal agent? Yes No

12. Fiscal agent name and title **Wesley Wright, Director of Research and Sponsored Programs**

13. Total federal award dollars spent in most recently completed fiscal year **\$128,144,865**

14. Total state award dollars spent in most recently completed fiscal year **\$9,532,928.50**



Bureau of Workers'
Compensation



Workforce Safety Innovation Grant Internal Control Questionnaire

Is the agency new to operating or managing BWC awards, or has not done so within the last five years? Yes No

List all **federal awards, grants, or contract revenue sources**. For each, include the program name, Catalog of Federal Domestic Assistance (CFDA) number, name of the federal agency, name of the pass-through agency, and the percentage of funds retained by the pass-through agency. If more than six entries exist, attach a separate list that includes all required fields shown below.

Program name	CFDA#	Federal agency	Pass-through agency	% of funds

List all **BWC awards, grants, contracts, or funding sources**. For each, include the grant name, associated Grant/Project number, and the total amount of funding. If more than six entries exist, attach a separate list that includes all required fields shown below.

Grant name	Grant/Project#	Amount of funding

Attach a copy of your Agency's Table of Organization (TO) that includes staff names and key positions.

What is the date TO was last updated?

07/01/2025

Attach a list of board members (if applicable), with the Board President's contact information and all their affiliations.

Does the agency have a federally approved indirect cost rate? Yes No

If yes, specify the approving agency:

DHHS

Attach the most recent federal indirect cost rate agreements (if applicable).

Does the agency have a state-approved indirect cost rate? Yes No

If yes, specify the approving state agency:

Attach the most recent state indirect cost rate agreements (if applicable).



Workforce Safety Innovation Grant Internal Control Questionnaire

II. Control environment

1. How many years has it been since your agency received an audit? 1 year ago

What types of audit(s) were performed? Provide the fiscal year(s) and audit report date(s).

FY	Report Date
24	12/27/24

2. List all institutions or grantors that have performed an audit or review of your agency funds or programs and report the results for the previous three years.

Institution/Grantor	Description of findings
Forvis Mazars, LLP	There was a finding related to procurement.

3. Has the State of Ohio or other authority placed your agency in a special financial condition (e.g., financial watch, fiscal emergency, high risk, etc.)? Yes No
 4. Has there been or are you expecting turnover of key personnel (fiscal and/or programmatic) that has affected or may affect a program? Yes No

If yes, provide the name(s), title(s), and effective dates(s).

Name	Title	Effective date



Bureau of Workers'
Compensation



Workforce Safety Innovation Grant Internal Control Questionnaire

5. Frequency of Board of Directors/Trustees meetings each year:

If your board does not meet yearly, then how often?

6. Does the board receive a copy of the financial and programmatic audit reports? Yes No

What does the Board of Directors do with the following reports?

- a. Audit
- b. Financial
- c. Programmatic

Are these reports reviewed during board meetings? Yes No

7. Does your agency have a Code of Ethics for the Board of Trustees and its' employees? Yes No

How often is it signed by board members and employees?

8. Have there been changes to financial management (CFO, Finance Director, etc.) in the past 12 months or will there be in the near future? Yes No
9. Does the senior administrative staff (e.g., CEO, CFO) have at least three years of experience in their current position with the agency, or at least five years of experience in a comparable position in the field? Yes No

List staff, title, and number of years.

Name	Title	Years
Jennifer Morrison	Chief Accounting and Tax Officer	19
Linda Manley	Director Grants & Contracts	26

10. Does the agency have any of the following?

- a. Directors & Officers Insurance Yes No
- b. Fidelity bond Yes No
- c. Employee dishonesty insurance for accounts exceeding the FDIC limit of \$250,000 Yes No
If yes to 10c, attach proof of coverage or institutional assurance.

11. Are you aware of any conflicts of interest or related parties to BWC/WSIC within your agency? Yes No

If so, describe.



**Bureau of Workers'
Compensation**



Workforce Safety Innovation Grant Internal Control Questionnaire

12. List staff or board members who are related to each other. Provide the names, positions, and relationships. If more than six individuals, attach a separate list that includes all required fields shown below.

Name	Position	Relationship
Paula Murray	Staff Accountant II	aunt
Taylor Kwalton	Staff Accountant II	niece to Paula

13. Did the agency adopt the provisions of 2 CFR 200 (Uniform Guidance)? Yes No

14. How many bank accounts does the agency have? 2

Provide the bank account in which WSIC grant funds will be deposited and managed. Include each additional bank account and its purpose or attach a list.

Bank account ending in 7888 will house/manage the WSIC grant funds. Bank account ending 8476 manages the Title IV funds.

If no more than one account, what controls do you have to account for multiple funding sources?

Bank accounts are reviewed/reconciled by two different people.

Does your agency have any interest earning accounts? Yes No

15. Pertaining to bank accounts, is there a policy in place for who can open, close, transfer, deposit, and withdraw funds? Yes No

List those employees.

Name	Title
Benjamin Taylor	Senior Treasury Analyst
Stephanie Heitz	Treasury Operations Manager
Lettie Brandenburg	Treasury Assistant

16. Are bonuses or salaries tied to the amount of federal or state funding brought into the agency? Yes No

17. How do you screen new and current employees who have a fiduciary responsibility for handling cash?

Make sure they have reviewed all fiduciary policies.

18. Has the agency operated at a loss for the current or past periods? Yes No

- a. Is debt growing or declining?



Workforce Safety Innovation Grant Internal Control Questionnaire

III. Risk assessment

1. Does your agency have a time and effort documentation policy (e.g., labor verification, certification of effort) for exempt and non-exempt employees? Yes No
2. Are all Human Resources and employee policies complicit with the Fair Labor Standards Act – specifically, the sections concerning overtime pay and exemption status? Yes No
3. Are credit cards used for state awards? Yes No

If so, where are they stored?

N/A

Are there written guidelines on how they can be used? Yes No

4. Does the agency issue payroll and travel advances? Yes No

If so, under what circumstances and include the process for reconciliation.

For travel advances and authorization and cash advance request is entered in Workday. Upon return an expense report is required to reconcile the cash advance. No payroll advances are issued.

5. How often does your agency reconcile bank accounts to bank statements? If a fiscal agent is used, how often are accounts reconciled to the fiscal agent's records?

Monthly

Other (Specify)

6. Is the person who reconciles the bank accounts different from the person who participated in the receipt or disbursement process? Yes No
7. Is there a comparison of dates and amounts of deposits as shown on the bank statement with your accounting records? Yes No
8. Is there a review of all checks outstanding over 90 days? Yes No
9. Are checks voided if outstanding for six months? Yes No
10. Is the bank notified immediately of changes in authorized check signers? Yes No
11. Are all journal entries for bank charges and bank account interest recorded on a monthly basis? Yes No
12. Did the agency have audit findings in any of their most current audits? Yes No
 - Single
 - Financial
 - Programmatic
13. If yes to question 12, did the agency correct the findings? If no, why not?

Yes the finding is being corrected.



Bureau of Workers'
Compensation



Workforce Safety Innovation Grant Internal Control Questionnaire

14. Where are unused checks stored?

Unused checks are stored in a locked storage closet in the Controllers Office.

a. Who has access to unused checks? (Name, title)

Only the Accounts Payable team has access to the key to this closet.

b. Are checks ever pre-signed? Yes No

If yes, under what circumstances?

c. Are checks ever made payable to "cash"? Yes No

If yes, under what circumstances?

15. Does the agency have any loans secured by bank accounts containing awards/grants from federal funds passed through by the State of Ohio? (This includes using all grants/accounts receivable as collateral.) Yes No

16. Has the agency ever used special loan or funding programs (e.g., letters of credit) to meet its cash needs?
 Yes No

If yes, under what circumstances?

17. Is the agency, its board, and/or subcontractor aware of any material instances of fraud, illegal acts, or violations of contract provisions or grant agreements in the past three years? Yes No

If yes, explain.

18. Does the agency have or previously had a lawsuit(s) filed against them? Yes No

If yes, list all pending and/or previous lawsuits with detailed information regarding who filed the lawsuit, the reason for filing, the probable final judgment rendered, and whether any are related to BWC-funded projects.

19. Does your agency perform an internal agency wide risk analysis? Yes No

If so, describe the process or provide a copy of your policy.

Our internal auditor performs risk analysis each year for the Board of Trustees.



Workforce Safety Innovation Grant Internal Control Questionnaire

IV. Control activities

1. Are all vouchers closed when paid? Yes No
2. Are all invoices closed when paid? Yes No
3. Does the check number and date appear on the closed voucher package? Yes No
4. Are there initials or signature(s) on the voucher/invoice to indicate approval for payment? Yes No

5. How frequently are checks and cash deposited in the bank?

Daily

6. How many authorized signatures are required on checks?

One signature

If two signatures are not required, is there a dollar amount above which two signatures are required? Yes No

If so, provide the amount.

Describe how checks are signed, e.g., signature applied by accounting software, manually signed, signature stamp, etc.

Checks are signed using a digital signature after a transaction receives final approval from the VP of Finance and Business Services.

List the individuals authorized to sign checks and their titles.

Name	Title
Dr. David C. Creamer	VP of Finance and Business Services
Bruce Guiot (backup signer)	Assoc Treasurer/CFO MU Foundation

7. Indicate the custodian of petty cash by name and position. State the amount of petty cash. For what is petty cash primarily used?

Name	Position	Amount
No petty cash as we are a cashless university		

8. Does the agency provide adequate coverage if bank account balances exceed the FDIC limit? Yes No

If yes, describe the coverage. If no, how does the agency mitigate the risk of loss?

Miami University participates in a bank depository program prescribed by the Ohio Revised Code and overseen by the Treasurer of the State of Ohio. For deposits above the FDIC limit, the bank is required to hold US Treasury securities as collateral for those deposits.

9. State the acquisition cost at which equipment is inventoried.

\$10,000



Workforce Safety Innovation Grant Internal Control Questionnaire

Indicate if inventory records include the following information.

Serial or model number	Yes <input type="checkbox"/>	Acquisition date	Yes <input type="checkbox"/>
Funding source	Yes <input type="checkbox"/>	Acquisition cost	Yes <input type="checkbox"/>
% Paid by funding source	Yes <input type="checkbox"/>	Location	Yes <input type="checkbox"/>
Description	Yes <input type="checkbox"/>	Disposition info	Yes <input type="checkbox"/>

Irrespective of the dollar amount, what else is inventoried?

software

When was the last physical inventory performed?

03/20/2005

1. Does your agency have micro-purchase transactions? Yes No

If so, how does your agency ensure the same vendor is not used with micro-purchases?

Micro-purchases are approved and reviewed by the Procurement Office.

2. How does your agency manage purchases to ensure compliance with the Uniform Guidance (2 CFR 200)?

All goods and services must go through the Procurement Office.

3. Does your agency have a procurement policy? Yes No



Workforce Safety Innovation Grant Internal Control Questionnaire

V. Communication

1. Does your agency have the following five policy and procedure manuals?

- a. Accounting
- b. Personnel
- c. Travel
- d. Procurement
- e. Allocation

Yes	<input type="checkbox"/>

How often are policies and procedures updated?

As needed

2. Does your staff acknowledge receipt and review of policies and procedures? Yes No
3. Has the agency changed accounting software systems in the past 12 months or anticipate doing so within the next 12 months? Yes No
4. Does the accounting system support fund accounting and track grant-specific expenditures? Yes No
5. Is financial information reported to the Board of Directors at least quarterly? Yes No



Workforce Safety Innovation Grant Internal Control Questionnaire

VI. Monitoring

1. Identify the individuals (names and titles) responsible for the following tasks:

	Name	Title
a. Completes monthly bank reconciliations	Ben Taylor	Senior Treasury Analyst
b. Reviews and approves completed bank reconciliations	Jennifer Morrison	Chief Accounting Officer & Tax Officer
c. Monitors cost allocations	Various grant staff accountants	Senior Staff Acct & Staff Acct II
d. Prepares journal entries	Various grant staff accountants	Senior Staff Acct & Staff Acct II
e. Reviews and approves journal entries	Linda Manley	Director Grants & Contracts
f. Reviews trial balances for out of balance conditions	various grant staff accountants	Senior Staff Acct & Staff Acct II
g. Compares charges for services and related expenses to the contract	Various grant staff accountants	Senior Staff Acct & Staff Acct II
h. Reviews and reconciles payroll journal	Various grant staff accountants	Senior Staff Acct & Staff Acct II
i. Compares budget to actual expenses	Various grant staff accountants	Senior Staff Acct & Staff Acct II
j. Prepares grant budget modification	Various PI's	Principal Investigators

2. Identify the individuals (names and titles) with the following primary responsibilities:

	Name	Title
a. Preparing a grant budget	Various PI's	Principal Investigators
b. Preparing financial reports	various grant staff accountants	Senior Staff Acct & Staff Acct II
c. Preparing program income reports	various PI's	Principal Investigators
d. Preparing grant work plan	Various PI's	Principal Investigators
e. Comparing work plan to actual service	Various PI's	Principal Investigators
f. Preparing programmatic reports	various PI's	Principal Investigators

3. How does your agency generate invoices/expenditure reports/reimbursement requests?

Explain

All grant invoices, expenditure reports and reimbursement requests are generated through our ERP system, Workday.

4. Are the financial reports prepared and distributed in a timely manner (typically within 30 days) to ensure they're useful for managing the grant project? Yes No



Workforce Safety Innovation Grant Internal Control Questionnaire

5. Does your agency maintain the following records for at least three years after the State of Ohio closes out the award? Yes No
6. Does your agency have a process for monitoring compliance with federal, state, and grant regulations? Yes No

List the responsible parties.

Name	Title	Responsibilities
Linda Manley	Director Grants & Contracts	Oversee grant compliance

7. Do your agreements with any of your funding sources involve subcontractor or subgrantee arrangements?
 Yes No

If yes to #7

How frequently are funds passed through? Monthly

How often is monitoring performed? Monthly

Are monitoring reports issued? Yes No

Other (Specify) subcontractor monitoring is reviewed monthly by the PI upon receipt of invoice

Document submission checklist:

Please provide full documents. Web pages and links will not be accepted.

- Agency Table of Organization
- Board of Directors List (with Contact Information)
- Indirect Cost Rate Agreements (Federal and State, as applicable)
- Agency Procurement Process/Procedure
- Time and Effort/Certification of Effort/Labor Verification Procedure
- Equipment Inventory Procedures
- IRB Process/Procedure
- Proof of Coverage/Institutional Assurance (if applicable)

Type text here

Certification

By signing below, the authorized representative certifies that the information provided in this internal control questionnaire is accurate and complete to the best of their knowledge.

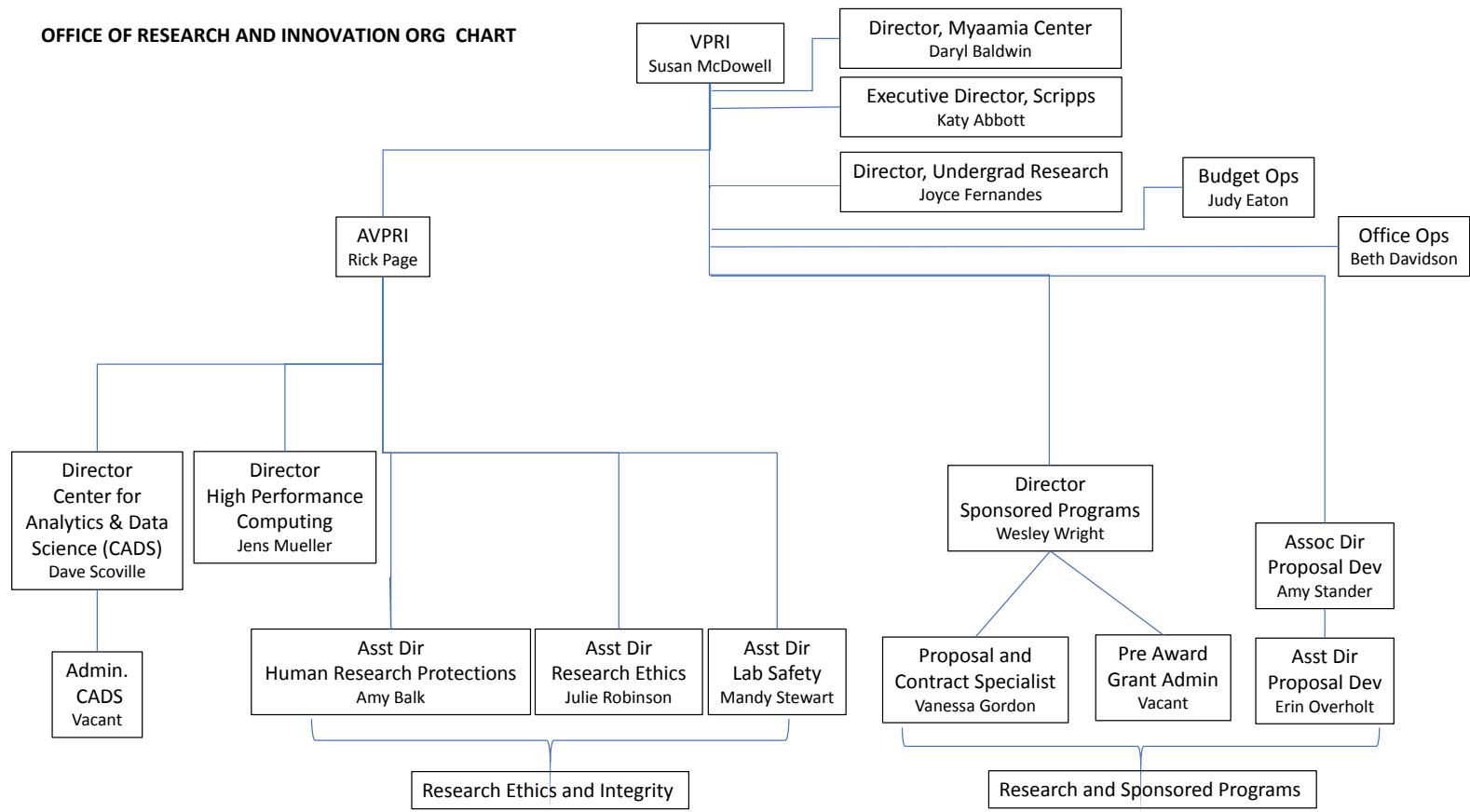
Wesley Wright

Signature (Agency Fiscal Leader)

7/31/2025

Date

Agency Table of Organization

OFFICE OF RESEARCH AND INNOVATION ORG CHART

Board of Directors List



2024-2025 Miami University Board of Trustees

[Board financial participation is 93% (13/14)]

OFFICERS

Mary Schell, Chair
Chief Public Affairs Officer, Wendy's
Columbus, OH

Deborah Feldman, Vice Chair
President & CEO
Dayton Children's Hospital
Dayton, OH

Steve Anderson, Secretary
Executive Vice President
Retirement Plan Services, Charles Schwab
Medina, OH

Rod Robinson, Treasurer
CEO, Connexus
Cincinnati, OH

ADDITIONAL MEMBERS

Zachary Haines
CEO, DPA Buying Group
Cincinnati, OH

Ryan D. Burgess
President & CEO,
Goodwill Columbus
Bexley, OH

Elizabeth McNellie
Partner
BakerHostetler
New Albany, OH

Lisa Peterson
Director of Communications
Ohio Governor's Office
Columbus, OH

Bill Ebbing
President & CEO
New Albany Company
New Albany, OH

NATIONAL TRUSTEES
Mark Sullivan
KBC Financial (retired)
Wilton, CT

Jeff Pegues
CBS News
Washington, D.C.

S. Biff Bowman
Director,
First Interstate Properties
Chicago, IL

Dinesh Paliwal
Partner, KKR
New York, NY

Rick McVey
Chairman & CEO
MarketAxess
Riverside, CT

Indirect Cost Rate Agreements

COLLEGES AND UNIVERSITIES RATE AGREEMENT

EIN: 31-6402089

Date: 05/07/2025

ORGANIZATION:

FILING REF.: The preceding
agreement was dated
08/15/2018

Miami University

107 Roudebush Hall

Oxford, OH 45056-3653

The rates approved in this agreement are for use on grants, contracts and other agreements with the Federal Government, subject to the conditions in Section III.

SECTION I: INDIRECT COST RATES

RATE TYPES: FIXED FINAL PROV. (PROVISIONAL) PRED. (PREDETERMINED)

<u>EFFECTIVE PERIOD</u>					
<u>TYPE</u>	<u>FROM</u>	<u>TO</u>	<u>RATE(%)</u>	<u>LOCATION</u>	<u>APPLICABLE TO</u>
FINAL	07/01/2023	06/30/2024	44.50	On Campus	Organized Research
FINAL	07/01/2023	06/30/2024	44.00	On Campus	Instruction
FINAL	07/01/2023	06/30/2024	39.00	On Campus	Other Sponsored Activities
FINAL	07/01/2023	06/30/2024	26.00	Off Campus	All Programs
PRED.	07/01/2024	06/30/2028	46.50	On Campus	Organized Research
PRED.	07/01/2024	06/30/2028	49.00	On Campus	Instruction
PRED.	07/01/2024	06/30/2028	41.00	On Campus	Other Sponsored Activities
PRED.	07/01/2024	06/30/2028	26.00	Off Campus	All Programs
PROV.	07/01/2028	Until Amended			Use same rates and conditions as those cited for fiscal year ending June 30, 2028.

*BASE

ORGANIZATION: Miami University
AGREEMENT DATE: 05/07/2025

For awards ending on or before 06/30/2025:

Modified total direct costs, consisting of all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel and up to the first \$25,000 of each subaward (regardless of the period of performance of the subawards under the award). Modified total direct costs shall exclude equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of \$25,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs.

For awards beginning on or after 07/01/2025:

Modified total direct costs, consisting of all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel and up to the first \$50,000 of each subaward (regardless of the period of performance of the subawards under the award). Modified total direct costs shall exclude equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of \$50,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs.

ORGANIZATION: Miami University
AGREEMENT DATE: 05/07/2025

SECTION II: SPECIAL REMARKS

TREATMENT OF FRINGE BENEFITS:

The fringe benefits are charged using a rate(s). Over/under recoveries from actual costs are adjusted in current or future periods. The directly claimed fringe benefits are listed below.

TREATMENT OF PAID ABSENCES:

Vacation, holiday, sick leave pay and other paid absences are included in salaries and wages and are claimed on grants, contracts and other agreements as part of the normal cost for salaries and wages. Separate claims are not made for the cost of these paid absences.

OFF-CAMPUS DEFINITION: The off-campus rate will apply for all activities: a) Performed in facilities not owned by the institution and where these facility costs are not included in the F&A pools; or b) Where rent is directly allocated/charged to the project(s). Actual costs will be apportioned between on-campus and off-campus components. Each portion will bear the appropriate rate.

FRINGE BENEFITS:

Retirement Tuition Remission

Disability Insurance Worker's Compensation

Life Insurance Unemployment Insurance

Health Insurance Dental Insurance

Effective 10/01/2024:

The rates in this rate agreement were reviewed in compliance with the HHS and NIH Grants Policy Statement applying a Salary Rate Limit (SRL) to indirect cost salaries & wages not exceeding the Executive Level II rate contained in the HHS Appropriations Act.

Next Proposal Due –

Your next proposal, based on actual costs for the fiscal year ended, 06/30/2027, is due in our office by 12/31/2027.

Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000.

Beginning 07/01/2025:

Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$10,000.

ORGANIZATION: Miami University
AGREEMENT DATE: 05/07/2025

SECTION III: GENERAL

A. LIMITATIONS:

The rates in this Agreement are subject to any statutory or administrative limitations and apply to a given grant, contract or other agreement only to the extent that funds are available. Acceptance of the rates is subject to the following conditions: (1) Only costs incurred by the organization were included in its facilities and administrative cost pools as finally accepted; such costs are legal obligations of the organization and are allowable under the governing cost principles; (2) The same costs that have been treated as facilities and administrative costs are not claimed as direct costs; (3) Similar types of costs have been accorded consistent accounting treatment; and (4) The information provided by the organization which was used to establish the rates is not later found to be materially incomplete or inaccurate by the Federal Government. In such situations the rate(s) would be subject to renegotiation at the discretion of the Federal Government.

B. ACCOUNTING CHANGES:

This Agreement is based on the accounting system purported by the organization to be in effect during the Agreement period. Changes to the method of accounting for costs which affect the amount of reimbursement resulting from the use of this Agreement require prior approval of the authorized representative of the cognizant agency. Such changes include, but are not limited to, changes in the charging of a particular type of cost from facilities and administrative to direct. Failure to obtain approval may result in cost disallowances.

C. FIXED RATES:

If a fixed rate is in this Agreement, it is based on an estimate of the costs for the period covered by the rate. When the actual costs for this period are determined, an adjustment will be made to a rate of a future year(s) to compensate for the difference between the costs used to establish the fixed rate and actual costs.

D. USE BY OTHER FEDERAL AGENCIES:

The rates in this Agreement were approved in accordance with the authority in Title 2 of the Code of Federal Regulations, Part 200 (2 CFR 200), and should be applied to grants, contracts and other agreements covered by 2 CFR 200, subject to any limitations in A above. The organization may provide copies of the Agreement to other Federal Agencies to give them early notification of the Agreement.

E. OTHER:

If any Federal contract, grant or other agreement is reimbursing facilities and administrative costs by a means other than the approved rate(s) in this Agreement, the organization should (1) credit such costs to the affected programs, and (2) apply the approved rate(s) to the appropriate base to identify the proper amount of facilities and administrative costs allocable to these programs.

BY THE INSTITUTION:

Miami University

(INSTITUTION)

David K. Creamer
(SIGNATURE)

David K. Creamer
(NAME) Senior Vice President for
Finance and Business Services
Miami University
(TITLE)

May 22, 2025
(DATE)

ON BEHALF OF THE GOVERNMENT:

DEPARTMENT OF HEALTH AND HUMAN SERVICES
(AGENCY)

Olulola O. Digitally signed by
Olulola O.
Oluborode Oluborode-S
(SIGNATURE) Date: 2025.05.19
-S 11:24:07 -04'00"

Olulola Oluborode
(NAME)

Director, Cost Allocation Services
(TITLE)

05/07/2025
(DATE)

HHS REPRESENTATIVE: Joel McKenzie

TELEPHONE: (214) 767-3261

Agency Procurement Process/Procedure

1.00 Procurement Authority and Regulations

1.01 Procurement Authority

The procurement of supplies, materials, equipment, and services necessary for the operation of the University is the responsibility of the Office of Strategic Procurement. This responsibility has been delegated to the Chief Procurement Officer by the Senior Vice President for Finance and Business Services and the Treasurer, in accordance with Resolution 84-59 of the Board of Trustees of Miami University.

No individual has the authority to enter into a contract for the purchase of goods or services, or otherwise obligate Miami University to purchase indebtedness, without at least one of the following:

A resolution of the Board of Trustees

A specific delegation by the Senior Vice President for Finance and Business Services in writing and on file with the Secretary of the University

A Purchase Order (PO) or other contract instrument issued by or under the direction of the Chief Procurement Officer.

Negotiations conducted or commitments made without such authority do not obligate the University, but are the personal responsibility of the individual making the commitment.

Expenditures from all accounts, regardless of its source, are considered University funds and shall be administered in accordance with applicable University policy.

1.02 Methods of Procurement

Purchases for goods and services may be initiated by one of four methods: Workday, a Purchase Order, a Contract, or by Purchasing Card.

Workday provides easy access to multiple supplier catalogs with University-negotiated pricing, and a comprehensive workflow tool for electronic purchase approvals.

A PO or contract is issued prior to any commitment made for the purchase of goods or providing of services, and is presented to the vendor or service provider at the time the purchase is made or contract is arranged. The Office of Strategic Procurement will not issue POs or contracts after the fact to cover commitments.

Purchasing Cards are intended for departmental use to conduct small dollar procurement needs and are to be used in accordance with P-Card Policy and Procedures

In addition, it is specifically discouraged for employees to process requisitions for personal reimbursement of university supplies and/or services unless under the most extreme circumstances.

1.03 Methods of Payment

It is Miami's strong preference that all amounts due and owing under this Agreement will be paid via Miami's Single Use Account (SUA) virtual credit card program (the "Program"), currently offered through J.P. Morgan Chase. If Contractor enrolls in the Program, then all payments due under this Agreement will be paid immediately upon Miami's processing of each invoice submitted by Contractor. If Single Use Account is not accepted, Miami will set payment terms as 2%/Net10, Net30 via ACH. Unless otherwise set forth in a SOW, Miami shall pay the Fee in equal monthly installments during the Term, with the first installment payable on the date that is thirty (30) days from the Effective Date of this Agreement. Thereafter, all subsequent undisputed installments will be payable on the anniversary date of the first installment payment.

Invoice – The preferred method to request payment is via an invoice submitted from the vendor, individual, or service provider and that is made with reference to a PO or Contract. Invoice payment requests where there is no Purchase Order in place or created before services has been rendered, or created after the fact will be denied. The "No PO No Pay" policy compliance will be monitored.

Prepayment – State statutes generally prohibit the University from making payment prior to receipt of merchandise or rendering of service. Routine prepayments are limited to those defined by the P-Card Policy and Procedures. When using the P-Card for prepayment, "proof of price" must be provided. This may be an order form, letter from the vendor, copy of an advertisement, copy of a catalog page, or a price list. Requestors should ensure that proof of price is current, and includes any shipping charges. Other

prepayments will be authorized when required to complete a transaction that is clearly advantageous to the University. See direct pay and pro-forma invoice.

Pro-Forma Invoice – There may be instances when a pre-payment is required and a pro-forma invoice is issued. The circumstances requiring pre-payment via pro-forma invoice may include for example, the purchase of equipment or software, travel bookings, and construction projects. The use of a pro-forma invoice should be in conjunction with a PO or Contract and defined by the payment terms and conditions. Final authority to approve a pro-forma invoice will be made on a case-by-case basis with concurrence from the Office of Strategic Procurement.

Direct Pay – The following transactions are approved for processing on Direct Pay requisitions:

1. Invoices submitted by a supplier against a contract entered into and approved by the Office of Strategic Procurement where there is no confirming PO
2. Invoices submitted without a PO or contractual commitment and the payment initiates the authorization for work to proceed
These types of transactions will be reviewed and approved on a case-by case basis by the Office of Strategic Procurement
4. Invoices submitted by a supplier who cannot accept a PO
Books and periodicals ordered from publishers or other subscription sources that cannot accept POs
Miscellaneous small orders up to \$2000 for publications, reprints, information, etc. from other universities, government agencies, etc., that cannot accept POs
6. Other transaction types approved in advance by the Chief Procurement Officer

Confirming Direct Pay Request requisitions for purchases or contracts that were not approved in advance by the Senior Vice President for Finance and Business Services or by the Chief Procurement Officer will be reviewed on a case-by-case basis for acceptance as an obligation of Miami University. Such requisitions are subject to rejection where the transaction violates state or local policy or where the materials or services were available from existing contracts.

1.04 Workday

Workday is a University-wide e-procurement system administered by the Office of Strategic Procurement. Workday is provided by SciQuest/Jaggaer, and is fully integrated with Banner. Workday is an online marketplace for purchasing goods and services at Miami University. Workday combines the use of Internet technology with procurement best practices to simplify the purchasing process and reduce costs.

Workday is used to submit requisitions, issue POs and change orders, pay invoices, and request other payments. It consists of various tools to facilitate these processes including adding attachments, and providing catalogs and forms for specific use.

Attachments – substantiating documentation, as applicable, must be included with requests i.e. quotes, insurance certifications, worker's compensation.

Forms – there are forms pre-built in Workday to assist the end user or requester with various tasks, such as making an IT purchase request, routing a contract for signature, setting up a new vendor, or requesting a PO change.

Catalogs – vendor catalogs are set-up in Workday for the end user or requester to use for selecting goods or services to purchase. These catalogs represent negotiated pricing through a competitive bid process, and are underwritten by a contract that Miami University is party to.

Instructions on how to use Workday are available by login to the application and accessing the user guide. Login via [Workday](#).

Budget and Special Approvals

A minimum approval process is required for requests entered into Workday. In general, budget approvals may consist of up to three levels or more of approval based on the total dollar amount of the request. The dollar amount set for each level of approval may vary department by department depending on specific needs or requirements of the department. The Dean or Chair of the department appoints the individuals who will be making budget approvals on behalf of the department and provides this information to the Controller's Office where budget approval queues are maintained.

In addition to budget approvals, special approvals may be required for requests. Special approvals may be determined by the type of good or service being requested and are put in place jointly by the Office of Strategic Procurement and special approver. The special approvals provide additional review points, such as for functional fit and acceptance (i.e. Accessibility), or for specific subject

matter review (i.e. Information Security), that may not be common knowledge of the end user, requester, or budget approver in their day-to-day activities.

Approvers have the responsibility to understand the request they are being asked to approve and should review corresponding information to ensure the following: budgets are met, the good or service being purchased meets the business requirements needed, and policy and procedures have been followed.

The approval process allows for delegation of authority where appropriate. The requirements do not permit the signing (or digital approval) of authorized individuals' names by other individuals.

P-Card transaction approvals are defined at the P-Card application process, which requires the department head and vice-president/dean's authorization. These transactional approvers are maintained by the Accounts Payable office through the credit card company's online tool.

A travel reimbursement request requires the approval of the traveler's supervisor, department head, or assigned proxy approver. These approval queues are maintained by the Accounts Payable department in the travel and expense application. See Accounts Payable site for instructions regarding [travel reimbursement](#).

1.05 Delivery/Receiving

Offices ordering small packages will receive departmental delivery from UPS, FedEx, or university mail services. Small package orders via Workday, P-Card, and any small package orders not associated with a PO should include an accurate delivery addresses. The University has a set of predetermined mail stop codes to use for delivery. If the package cannot be delivered properly, it may be returned to the sender and additional shipping fees may be assessed. Any large motor freight items will be shipped to Central Receiving (in Cole Service Building), unless other provisions have been made with the vendor and carrier.

Upon delivery, the requestor should perform the following procedures:

1. Check that items on the packing slips are accounted for, and that nothing is damaged.
2. Save packing slips and file per document retention policy.
3. If there is damage, save cartons and packaging.

4. Contact the seller / vendor promptly regarding problem(s).
5. If an invoice is available to review, check the items against the invoice. If there is a discrepancy, notify Accounts Payable to hold payment, and contact the vendor on correction procedures.

To comply with university policies around asset purchasing, equipment ownership and tracking, and financial approvals, all orders for Miami University must be delivered to an approved on-campus (Oxford) or Miami Regional address. Deliveries to non-campus locations are not permitted without the prior approval of Strategic Procurement.

If you are purchasing an item via Workday, please use one of the established addresses available for selection in Workday. If you are making a pcard purchase, please refer to [Miami's P-Card Policy, Section 5.03 - Restricted Items](#).

In some cases, it is required or more beneficial to the university to allow departments to order and ship goods to a non-Miami campus address. Strategic Procurement does allow departments to ship to these types of addresses providing there is justification or a beneficial reason to do so, but there are some noted exceptions.

Purchases made to off-campus addresses must be made via pcard, and must have Procurement's written approval prior to being made.

Computers (Desktops, Laptops) cannot be shipped to off campus locations.

Items that have an individual value above \$10,000 cannot be shipped to off campus locations due to asset control requirements.

To request the approval of an off-campus shipment, please email purchasing@miamioh.edu with the details of your purchase and justification for the need to ship item(s) off campus. All approvals given should be considered one-time approvals and just for the item(s) being requested.

1.06 Commodity Purchases Made Outside of Workday

Certain goods or services are available to purchase outside of Workday to facilitate standardization practices, branding standards, and adherence to University or state policy that would otherwise be difficult to address. The following list of products or services may be ordered via the methods described below.

Business Cards, Envelopes, Letterhead - The University has adopted a standardized format to be used for business cards, envelope return addresses, and letterhead stationery. Use of this format is mandatory for departments. Campus Services provides for the production and distribution of business cards by online ordering system at [Printing at Miami](#).

Software Store – The software store contains a collection of applications available for purchase and installation on Miami owned computers as well as free downloads for institutional computers and personal computers.

[Visit The Software Store](#)

1.07 Change Orders

Occasionally an order must be changed after issuance. It is important from a contract/accounting viewpoint, and for the protection of the parties, that a written PO change be issued to reflect the modified order. Requestors should not initiate, accept, or approve changes to a PO or contract without the Office of Strategic Procurement's concurrence. Change orders will be requested and processed within Workday.

1.08 Contracts and Contracting

The University contracting processes focus on protecting University interests in the creation and execution of agreements that are consistent and compliant with requesting units' needs, University policies, and state and federal laws. A contract creates a legally enforceable obligation between the parties to the contract. A contract may be titled a 'master service agreement', 'memorandum of understanding', 'letter of intent', or other name. Regardless of name, contracts are routed for review and signed by an authorized signatory of the University.

For most tangible goods purchases, the only tool needed is the Purchase Order, which serves as a contract as it contains the University's Terms and Conditions. Contracts are typically required for:

services on-site and off-site
made-to-order goods
leases/rentals (vehicles, facilities, real estate, equipment)
software
group events/catering
group lodging
charters

When to engage the Office of Strategic Procurement:

- a supplier provides their contract
- a template cannot be used
- a quote has terms attached
- a quote requires a University signature

If any of the above situations apply, route the document via the contract routing form available in [Workday](#) before any service work is performed for the University.

In order to keep track of the progress of a contract, the Office of Strategic Procurement requires the use of the Contract Routing and Approval form within Miami Workday. This will allow requesting units to monitor the workflow of the contract.

Departments should plan ahead and allow time for the supplier and the University to review and execute the contract. Requesting units can help speed up the contracting process by

- Using a Preferred Supplier as these suppliers already have agreements and insurance in place with the University
- Obtaining a complete W9 if a new supplier must be added
- Obtaining Certificates of Insurance and Workers Compensation as needed

Ensuring that documentation provided during the process is complete, has been reviewed by the requesting unit, and unacceptable contact language has been removed or modified per University requirements. This streamlines the review process, as the supplier will not need to be contacted to redo a document.

Contracting terms that cannot be accepted by the University and should be removed or modified on the contract:

Indemnification is a method of shifting responsibility for loss from one party to another when dealing with the claims of a third party. A provision requiring indemnification by the University is likely unconstitutional under Ohio law as thoroughly explained in Ohio Attorney General (OAG) Opinion 96-060. The Ohio Constitution (Article II, Section 22) and Ohio Revised Code require that any appropriation or financial obligation incurred by the University specify a maximum dollar amount and limit that obligation to the duration of the current biennium (2 year fiscal period). Indemnification clauses typically create a contingent liability that is uncertain as to amount and time and, as such, may occur beyond the biennium. As explained in OAG Opinion 05-007, the insertion of the language “to the extent permitted by applicable law” does not render an indemnification clause enforceable.

Jurisdiction defines the state whose laws will govern the transaction between Miami and the supplier. Venue or forum refers to the particular court before which any dispute will be brought. If the contract makes reference to the laws of any state other than Ohio, it is not acceptable.

Confidentiality statements in contracts are a means to keep information private and may define a way to mitigate a breach of confidentiality. Miami University is a public institution and as such, certain of its records are available for public review under the Ohio Public Records Act (Ohio R.C. 149.43 et seq.). Therefore, Miami cannot agree to hold information confidential.

Additional resources on contracting and signature authority can be found at the [Office of General Counsel](#).

Once the contract language is agreed upon by the parties, the contract is signed and the requesting unit is authorized to proceed. Contracts submitted in Miami Workday for routing and signature are ultimately archived by the Office of Strategic Procurement.

Contracts entered into for construction projects or other physical facilities improvements are managed by the Physical Facilities Department with consultation by the General Counsel's Office and the Office of Strategic Procurement. There are very specific requirements for construction and renovation projects and such activities are to be coordinated by the aforementioned offices. In general, projects that include physical alteration to Miami owned property will be managed by a Physical Facility project manager who will conduct the necessary bidding processes and supervise the work, with General Counsel and Purchasing oversight.

Certain contract agreement types are not routed through the Office of Strategic Procurement, and should follow those procedures as defined by the department with oversight:

Articulation, affiliation, and other similar agreements where no money is exchanged except for tuition agreements and/or waivers, are routed through Miami Workday using the Non-Financial Academic Contract Routing form and administered by the Division of Academic Affairs.

Externally funded grants or contracts are entered and submitted through the Cayuse eSPA system through the [OARS](#).

Agreements for gifts and scholarships are worked through the requesting units' University Advancement representative.

Contracts are subject to the University's [Records Retention Policy](#).

1.09 Approval Signatures

Pursuant to Section IV, Section 14.1 of the Miami University Board of Trustees Regulations (the "Regulations"), no agreement may be signed by an employee of University unless such employee is authorized by the Board of Trustees or the Regulations. In accordance with the authority granted to them under Article IV, Section 14.8 of the Regulations, the President, the Provost, and the Sr. Vice President for Finance and Business Services may delegate all or some of their authority to other officers or employees of University, which delegation is memorialized in the [Signature Authorities chart](#). Individuals who have been delegated authority to enter contracts on behalf of the University as authorized by the Board of Trustees and the Regulations may not sub-delegate their authority to any other person.

Given the above, the University has a uniform, minimum signature requirement for the approval of all requisitions, P-Card statements, travel reimbursement requests, and personal reimbursement requests. Any purchase commitment or transaction as described above must be approved and signed by authorized individuals in accordance with this policy. See the [Approval Requirements](#) for Requisitions.

1.10 Purchasing Transactions Related to Grants or Sponsored Programs

Special procurement requirements often apply to purchasing transactions under a federal award or other sponsored program. In cases where the terms of the grant or contract are more restrictive than the university's policy, those terms shall govern. In cases

where the limitations imposed are less restrictive, the university's policy shall apply.

Time and Effort Reporting

2180 Grants & Contracts Effort Reporting

Subject Area: Sponsored Awards

Responsible Office: Grants & Contracts

Sponsor: Director Grants and Contracts

Revised: 06/25/2022

Refer Questions: Grants & Contracts Office @ grantsandcontracts@miamioh.edu

Purpose:

Uniform Guidance requires the grantee to confirm that the payroll costs charged to the Federal project are reasonable in relation to the actual work performed during the period. The purpose is to collect and reconcile all required Time and Effort Reports as required by the Office of Management and Budget (OMB) Federal regulations. The T&E will reflect the total activity for which the employee is compensated for both federal and non-federal work that is to equal 100% for that semester.

Uniform Guidance: § 200.430 Compensation - personal services.

(a) **General.** Compensation for personal services includes all remuneration, paid currently or accrued, for services of employees rendered during the period of performance under the Federal award, including but not necessarily limited to wages and salaries. Compensation for personal services may also include fringe benefits which are addressed in § 200.431. Costs of compensation are allowable to the extent that they satisfy the specific requirements of this part, and that the total compensation for individual employees:

- (1) Is reasonable for the services rendered and conforms to the established written policy of the non-Federal entity consistently applied to both Federal and non-Federal activities;
- (2) Follows an appointment made in accordance with a non-Federal entity's laws and/or rules or written policies and meets the requirements of Federal statute, where applicable; and
- (3) Is determined and supported as provided in paragraph (i) of this section, when applicable.

(b) **Reasonableness.** Compensation for employees engaged in work on Federal awards will be considered reasonable to the extent that it is consistent with that paid for similar work in other activities of the non-Federal entity. In cases where the kinds of employees required for Federal awards are not found in the other activities of the non-Federal entity, compensation will be considered reasonable to the extent that it is comparable to that paid for similar work in the labor market in which the non-Federal entity competes for the kind of employees involved.

(c) **Professional activities outside the non-Federal entity.** Unless an arrangement is specifically authorized by a Federal awarding agency, a non-Federal entity must follow its written non-Federal entity-wide policies and practices concerning the permissible extent of professional services that can be provided outside the non-Federal entity for non-organizational compensation. Where such non-Federal entity-wide written policies do not exist or do not adequately define the permissible extent of consulting or other non-organizational activities undertaken for extra outside pay, the Federal Government may require that the effort of professional staff working on Federal awards be allocated between:

- (1) Non-Federal entity activities, and
- (2) Non-organizational professional activities. If the Federal awarding agency considers the extent of non-organizational professional effort excessive or inconsistent with the conflicts-of-interest terms and conditions of the Federal award, appropriate arrangements governing compensation will be negotiated on a case-by-case basis.

(d) **Unallowable costs.**

(1) Costs which are unallowable under other sections of these principles must not be allowable under this section solely on the basis that they constitute personnel compensation.

(2) The allowable compensation for certain employees is subject to a ceiling in accordance with statute. For the amount of the ceiling for cost-reimbursement contracts, the covered compensation subject to the ceiling, the covered employees, and other relevant provisions, see 10 U.S.C. 2324(e)(1)(P), and 41 U.S.C. 1127 and 4304(a)(16). For other types of Federal awards, other statutory ceilings may apply.

Policy:

The collection of Time and Effort Reports will be initiated by the Grants and Contracts office in order to meet the Federal standards applicable to universities and colleges. The reports will be requested for the Fall, Spring and Summer semesters. The information shall reflect the actual effort performed, and appropriately charged, to the federal project based on the agency's approved salary budget set up in Banner. The Time and Effort Report(s) will be reconciled to the Payroll Report (NHIEDST) by the T & E grant accountant. The financial manager of the grant will investigate significant variances which are greater than 6% between the two reports, and make adjustments in the payroll system if needed. The reports will be emailed to the principal investigator (PI) after the final semester payroll is run and before the fourth week after the end of the semester.

The Director Grants and Contracts shall have primary responsibility within the Grants and Contracts Office for ensuring that procedures and reconciliations of the Time and Effort Reports are adequate.

Procedures:

- 1) The Grants & Contracts office will process payroll reports to capture grants & associated cost sharing after each semester final payroll run. The reports will contain the term covered, Principal Investigator, Department, Employee Name, Employee ID, Year, Pay No., Index, Fund, Orgn, Account, Program, Amount, and Fund Title. Hourly employees performing work on a federal grant will use the TimeClockPlus system to log their time based on their position number. The hourly employee's supervisor will approve the time. Salaried faculty/staff will track their time working on a federal grant by completing a form called "Grant Supplemental Payment Form", which will be approved by the Dean, Chair, Grants & Contracts and Academic Personnel.
- 2) The T & E grant accountant will review all federally sponsored grants. The T&E's will reflect the total activity for which the employee is compensated for both federal and non-federal work that is to equal 100% for that semester.
- 3) Information from the payroll reports will be entered into excel to generate list of employees requiring Time and Effort Reports to be sent to each PI.
- 4) The T & E grants accountant will update the electronic T & E Form and the canned T & E email language to include the current semester's due dates. Both are sent to the Director Grants and Contracts for review prior to distribution.
- 5) The T & E grant accountant will email each PI a canned message, list(s) of employees requiring Time and Effort Reports, and a blank electronic T & E Report. The issuance of the T&E reports to the PI's will occur within thirty (30) days following the last semester's payroll. The 1st email will request that the T&E reports be returned within 10 business days to the Grants & Contracts Office.
- 6) A checklist will be created to track the returned Time and Effort Reports. As Time and Effort Reports are returned to G & C, they are logged on checklist.
- 7) The T & E grant accountant will follow-up with PI by e-mail any outstanding T & E that are greater than 5 days past due.
- 8) Five days after sending the 2nd notice, an e-mail that lists all outstanding T & E's which are past due will be sent to the PI and Department Chair.
- 9) Five days after sending the 3rd notice, an e-mail that lists all outstanding T & E reports which are past due will be sent to the PI, Department Chair and Dean.
- 10) All T & E reports will be reconciled against Banner Payroll data (NHIEDST). The T&E will be compared to the percentages in Banner. If they match within 6% variance, they are considered reconciled. If there is a

difference in the percentages greater than 6%, they are not reconciled and need further review. A screen shot confirming reconciliation is added to the electronic record as an additional page and saved in the related grant account virtual files.

- 11) If the T & E reconciliation shows a significant variance (greater than 6%), the financial manager of the grant will be notified to follow-up and/or investigate the variance. If the payroll record needs corrected, a labor redistribution is submitted through the University's software system.
- 12) The grant accountant will follow-up by e-mail any outstanding T & E that are greater than 5 days past due and every 5 days thereafter until received or payroll corrections have been identified and resolved.

Cc: G:\CONTROFC\Shared\Policy Manual\G&C
G:\CONTROFC\GRANTS\Procedures

Equipment Inventory Procedures

2250 Equipment

Subject Area: Sponsored Awards

Responsible Office: Grants & Contracts

Sponsor: Director Grants & Contracts

Revised: June 25, 2022

Refer Questions: Grants & Contracts Office @ grantsandcontracts@miamioh.edu

Uniform Guidance (U.G.) reference: §200.310-316

Purpose: The purpose of this policy is to summarize responsibilities for acquisition, control, use, care, maintenance, disposition and reporting of equipment secured with external funding.

Definition: Equipment means tangible property having a useful life of more than one year and having an acquisition cost of \$5,000 or more.

Policy: Title or ownership of equipment acquired with external funds is vested with the university, unless deemed otherwise in the grant agreement. An equipment inventory will be conducted on an annual basis.

Procedures: Miami U. considers the following criteria key elements in determining when equipment charges are allowable:

- The equipment is necessary to fulfill the research objective of the project, or
- The project will be negatively impacted by not purchasing the equipment and
- The cost for the equipment is reasonable and represents prudent use of the sponsor's funds.

The Principal Investigators are authorized to initiate requests for the purchase of equipment and will go through the Office of Strategic Procurement if it meets the requirements for bidding. Principal Investigators are also responsible for proper use, maintenance and security of all assigned property, notifying General Accounting of any equipment received, and any shortage, damage, loss, theft or disposition of that property. In order to track federal equipment charged to a grant, the Grants & Contracts Offices runs a yearly equipment report using Advanced Query Tool (AQT) that captures all equipment. The query is located at G:CONTOFC/GRANTS/ADMINISTRATIVE DUTIES/AQT queries/Annual Federal Equipment Inventory.sql. The steps are as follows:

- 1) In the middle of the fiscal year (at least once every 2 years per UG 2 CFR200), run the AQT sql query for federal equipment inventory. (G:CONTOFC/GRANTS/ADMINISTRATIVE DUTIES/AQT queries/Annual Federal Equipment Inventory.sql)

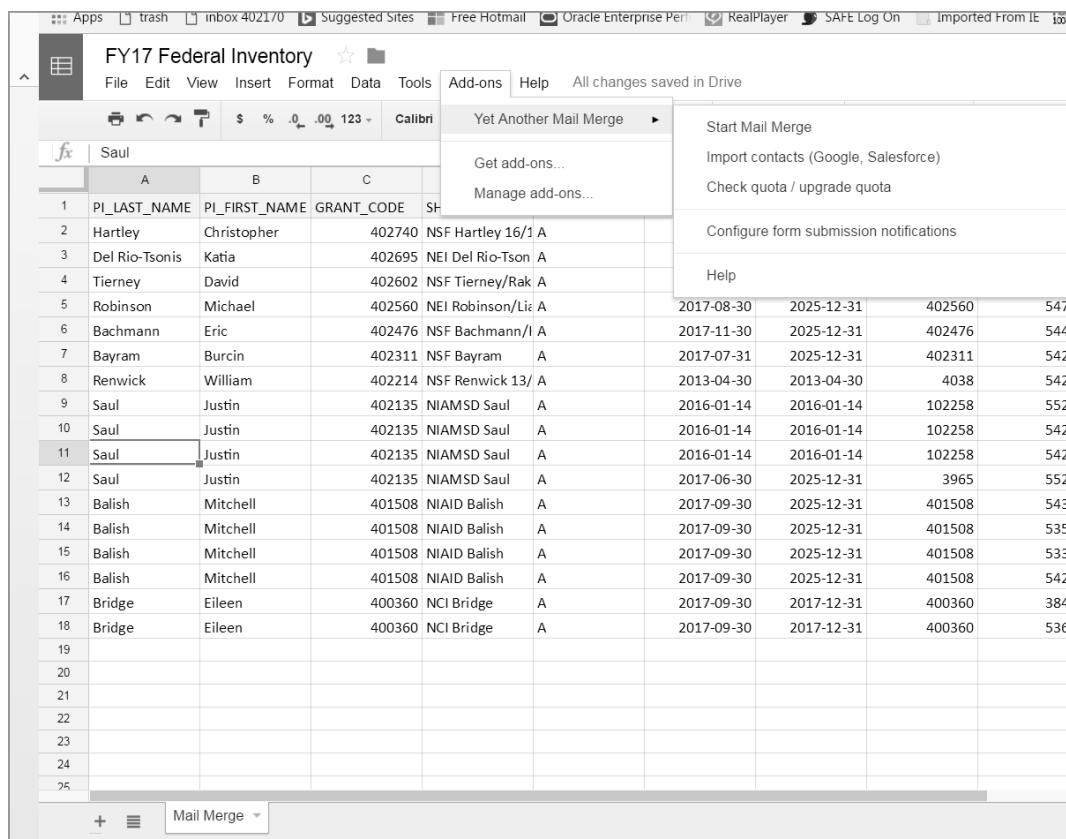
```
SELECT AFV.PI_LAST_NAME, AFV.PI_FIRST_NAME, AFV.GRANT_CODE,
AFV.SHORT_TITLE, AFH.GRANT_STATUS, AFH.TERMINATION_DATE as "Fund
Term.Date", AFH.EXPEND_END_DATE as "Fund Expend.End",
AFH.FUND, FFB.FFBMAST_BARCODE_NUM,
FFB.FFBMAST_ASSET_DESC, FFB.FFBMAST_MAKE, FFB.FFBMAST_MODEL,
FFB.FFBMAST_SERIAL_NUM_VIN, FFB.FFBMAST_ACQD_DATE,
AFH.FINANCIAL_MANAGER_UID, FFB.FFBMAST_LOCN_CODE_RESP,
FFR.FFRMASF_ACCT_CODE, FFR.FFRMASF_AMT, FFR.FFRMASF_AMT_PCT,
ffr.ffrmasf_prog_code
FROM FIMSMGR.FFBMAST FFB,
FIMSMGR.FFRMASF FFR,
BANINST1.AF_FUND_HIERARCHY AFH,
BANINST1.AF_GRANT_VIEW AFV
WHERE FFB.FFBMAST_OTAG_CODE=FFR.FFRMASF_OTAG_CODE
AND FFB.FFBMAST_GRNT_CODE=AFV.GRANT_CODE
AND AFH.GRANT_ID=AFV.GRANT_CODE
AND AFV.GRANT_CODE IN
(select AFH.GRANT_ID from BANINST1.AF_FUND_HIERARCHY AFH
where AFH.FUND_LEVEL_3 IN ('CFED', 'HFED', 'MFED'))
```

- 2) Export the results to G:CONTOFC/GRANTS/ADMINISTRATIVE DUTIES/Equipment Inventory and save as “Federal Equipment FY XX” in a newly created FYXX folder.
- 3) Review the report to make sure only federal grants are listed (NOTE: if there is a grant listed that is not federal, the setup of the grant was not correct because this report drives off of “XFED” hierarchy.)
- 4) Create a new tab called “active 4 funds” and copy original document into it. Delete any funds that have “I” in the “Grant Status” column and delete cost share funds. Sort by bar code then by fund code. If there is more than one row with the same bar code and same fund code, delete all but one of the rows.
- 5) Add a column to the end of the spreadsheet and label the column “PI email address”. Fill in their addresses. This will be used to send out the notices electronically (I can usually use last years report to find most of them so you don’t have to look them all up).
6)
- 6) Insert two columns before the column “FFBMAST_LOCN_CODE_RESP”. Name the first one closest to the column “FFBMAST_LOCN_CODE_RESP” “Room_Number” and the second one “Building”. You will need to split the numbers from the

"FFBMAST_LOCN_CODE_RESP" column out into the two new columns. Example: 414041 is room 041, building Pearson Hall. You can find this information in FTVLOCN.

Chart of Accounts	Location Code	Title	Status	Effective Date	Termination Date
C	001	ALEXANDER	A	08-AUG-2001	
C	001	ALEXANDER	A	03-FEB-2005	03-FEB-2005
C	001149	ALEXANDER	A	18-APR-2003	
C	001156	ALEXANDER	A	18-APR-2003	
C	001156	ALEXANDER HALL	A	05-OCT-2010	
C	001157	ALEXANDER	A	08-AUG-2001	
C	001157	ALEXANDER HALL	A	05-OCT-2010	
C	001180	ALEXANDER	A	16-DEC-2002	
C	002	Anderson Hall	A	01-JUL-1997	
C	002006	Anderson Hall	A	01-JUL-1997	

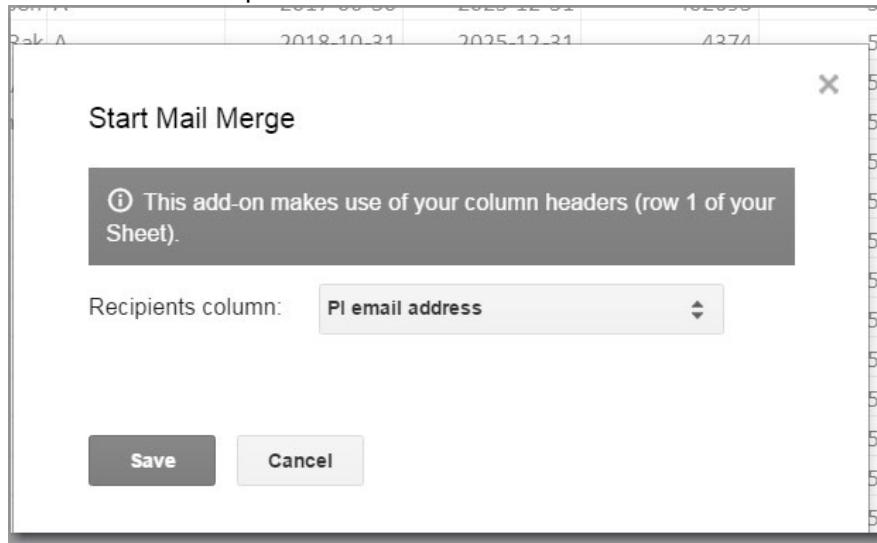
- 7) Open G:CONTROFC/GRANTS/ADMINISTRATIVE DUTIES/Equipment Inventory/Template FY17 Federal Equipment Inventory email in word. You will use this template for the mail merge in Google.
- 8) Open your google email account. Compose new email. Copy word document into the body of the email. Change the "DATE:" and return to me date at the bottom of the email. Name the subject line FYXX Federal Inventory. Leave Recipients blank. Click out of the email so it will save in your Drafts.
- 9) Open a new google sheet. Copy your excel spreadsheet from G:CONTROFC/GRANTS/ADMINISTRATIVE DUTIES/Equipment Inventory/Federal Equipment FY XX" and paste into your new google sheet. You will perform the Mail Merge from this new google sheet. Title the google sheet FYXX Federal Inventory. Name the tab of the sheet Mail Merge.
- 10) In the google sheet, click on Add-ons, Yet Another Mail Merge and then Start Mail Merge.



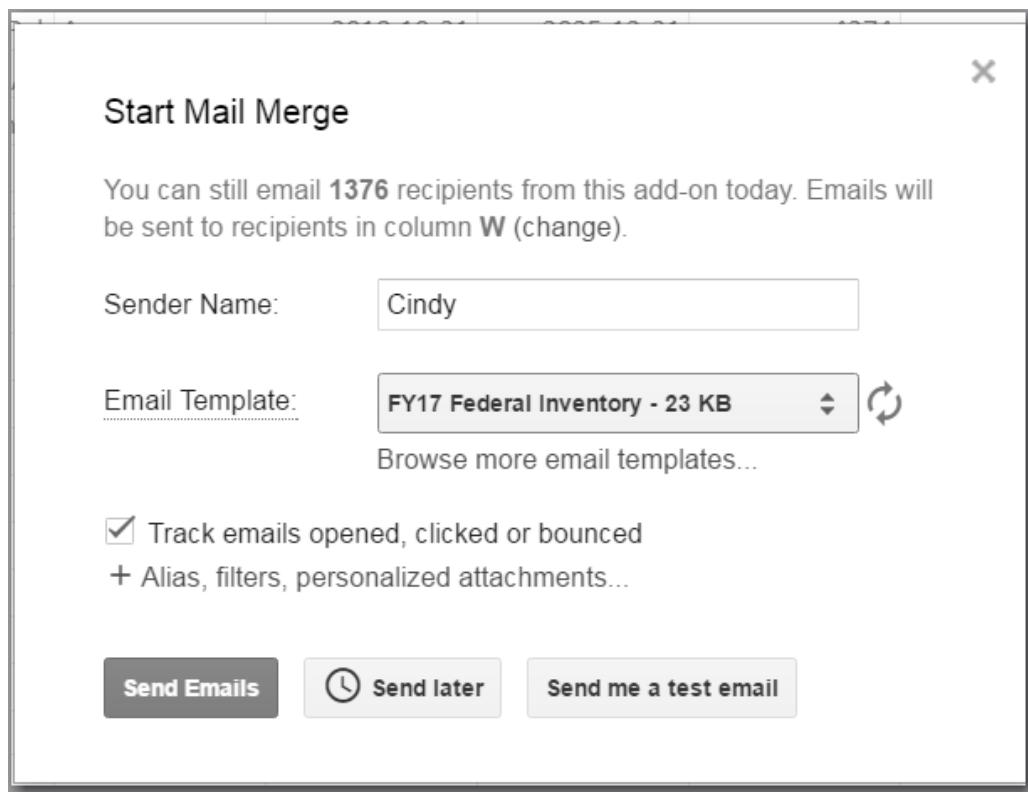
The screenshot shows a Google Sheets document titled "FY17 Federal Inventory". The table has three columns: A, B, and C. Column A contains PI_LAST_NAME, Column B contains PI_FIRST_NAME, and Column C contains GRANT_CODE. The "Recipients" column header is highlighted in yellow. The "Add-ons" menu is open, showing options like "Yet Another Mail Merge", "Import contacts (Google, Salesforce)", and "Check quota / upgrade quota".

	A	B	C				
1	PI_LAST_NAME	PI_FIRST_NAME	GRANT_CODE	SF	2017-08-30	2025-12-31	402560
2	Hartley	Christopher	402740	NSF Hartley 16/1 A	2017-11-30	2025-12-31	402476
3	Del Rio-Tsonis	Katia	402695	NEI Del Rio-Tson A	2017-07-31	2025-12-31	402311
4	Tierney	David	402602	NSF Tierney/Rak A	2013-04-30	2013-04-30	4038
5	Robinson	Michael	402560	NEI Robinson/Liz A	2016-01-14	2016-01-14	102258
6	Bachmann	Eric	402476	NSF Bachmann/I A	2016-01-14	2016-01-14	102258
7	Bayram	Burcin	402311	NSF Bayram A	2017-09-30	2025-12-31	401508
8	Renwick	William	402214	NSF Renwick 13/ A	2017-09-30	2025-12-31	401508
9	Saul	Justin	402135	NIAMSD Saul A	2017-09-30	2025-12-31	401508
10	Saul	Justin	402135	NIAMSD Saul A	2017-09-30	2025-12-31	401508
11	Saul	Justin	402135	NIAMSD Saul A	2017-09-30	2025-12-31	401508
12	Saul	Justin	402135	NIAMSD Saul A	2017-09-30	2025-12-31	401508
13	Balish	Mitchell	401508	NIAID Balish A	2017-09-30	2025-12-31	401508
14	Balish	Mitchell	401508	NIAID Balish A	2017-09-30	2025-12-31	401508
15	Balish	Mitchell	401508	NIAID Balish A	2017-09-30	2025-12-31	401508
16	Balish	Mitchell	401508	NIAID Balish A	2017-09-30	2025-12-31	401508
17	Bridge	Eileen	400360	NCI Bridge A	2017-09-30	2017-12-31	400360
18	Bridge	Eileen	400360	NCI Bridge A	2017-09-30	2017-12-31	400360
19							536
20							
21							
22							
23							
24							
25							

Make sure the Recipients Column is “PI email address” and click on the Save button.



Complete the Sender Name and verify the Email Template is “FYXX Federal Inventory” which is the draft email created in instructions number 7 and 8.



Click on the button “Send Emails.” I suggest to “Send me a test email” first to make sure everything merges correctly.

- 11) Once the emails are sent, insert a column in the “Federal Equipment FY XX” file named “Received” so that you can mark them off as they come in. Save the email responses in the appropriate virtual folders (Naming schema – PI Last Name_Grant Fund Number_Bar Code).
- 12) If a report comes in and states “wrong location”, “no longer used” or “no longer exists”, highlight that row in yellow. When all forms have been received, create another tab called “rept to Ravenna” in General Accounting and copy all the yellow rows into the worksheet. This spreadsheet gets sent to General Accounting so that they can update the fixed asset system.
- 13) If you have not received the completed email back, send out a reminder every 3-4 weeks until the required information is received.
- 14) After all responses have been received, randomly select 2 responses to physically review.
- 15) Email PI that physical verification of asset location is being requested. Add column to worksheet and record email date.
- 16) After physical verification of asset review is satisfactorily completed, log in date on worksheet.

If equipment needs to be transferred or disposed of, General Accounting requires the following procedures.

Transfers

To transfer the location of an asset, please fill out the [Change in Equipment Location](#) form.

If you are taking the equipment off campus, Miami requires all equipment be signed out before being removed. A [Property Pass](#) must be kept on file in your department and available for Inventory Control's review when auditing equipment.

Disposal

The procedures for disposing of a capital asset(s) are as follows:

1. Any department that has items that are considered surplus equipment should contact the Campbell Auction Team by email at campbellauction@aol.com for pick-up. The pick-ups will be scheduled for the 2nd Tuesday of each month, provided they are notified by the 1st Tuesday of the month. The regionals will be picked up by arrangement with the Campbell's Auction Team.
2. Any computer or IT equipment will need to be recycled through the IT department. This will include desktop computers, laptops, printers, copiers or any device that contains a memory chip. Please contact your Technical Service Representative (TSR) in your department to schedule the storage and pick-up of the equipment.
3. All licensed vehicle disposals will be coordinated through the [Office of Strategic Procurement](#).

Please remember that when disposing of any Capital Asset, you must complete the [Disposition of Capital Equipment](#) form.

IRB Process/Procedure

Human Subject Research

Plan to submit projects to the Institutional Review Board (IRB) at least 4-6 weeks prior to implementation. Investigators will need to complete our Training Program: the **CITI Humans as Subjects Basic Course** and the **Miami University Human Subject Research Orientation**.

All engaged personnel on research projects must complete the [CITI](#) training. Be mindful that the training consists of several modules that require a few hours of time. After 3 years, a much shorter refresher course will keep the training valid.

CITI training is transferable among institutions. Colleagues from external institutions may affiliate their CITI account with Miami or provide completion certificates.

Steps to add an affiliation within CITI

- Log into your CITI account
- On the home page, scroll down to select Add Affiliation
- Select Miami University (Oxford, Ohio)
- Select Courses
- Select Humans as Subjects IRB Basic Course
- Complete all modules highlighted in blue including 3 electives

*Please utilize the [Humans as Subjects CITI Completion Guidance](#) for support

Required Training

Next, complete [The Miami University Human Subject Research Orientation](#) which is now located on Canvas with open self-enrollment for everyone. Anyone serving as the Primary Contact or Faculty Adviser must complete the Human Subject Research Orientation.

IRB Application Form

The next step is to download the appropriate IRB Application Form and associated documents from the [Research Ethics & Integrity webpage](#). Within each Application file is a [guidance document and templates](#). Once ready, the Faculty Advisor will submit the project to humansubjects@MiamiOH.edu. Upon study closure, please email humansubjects@MiamiOH.edu requesting the protocol to be closed.

Projects associated with funding require an [FCOI/CoC disclosure](#), CITI training completion, and a corresponding Cayuse number.

For projects that involve blood or saliva, OSHA Bloodborne Pathogens training is required.

*Please utilize the [OSHA Bloodborne Pathogens Completion Guidance](#) for support.

Feel free to reach out to the Research Ethics Integrity Program for further information.

Review the [International Research Considerations](#) for students, faculty, and staff, to provide guidance for international travel and for working with collaborators both here in the US and internationally.

Frequently Asked Questions:***Do I need to submit an application to the IRB for review?***

- Yes, if there is intent or the possibility of presentation or publication leading to generalizable knowledge.
- Yes, if projects will be shared at Miami through graduate or undergraduate symposiums or published in the Commons.
- Approval cannot be obtained post hoc.

What are the best practices for classroom research?

- Keep content PG-rated, researchers have a duty to do no harm.
- Ensure provisions for privacy & confidentiality even if not Human Subject Research.
- Anonymize and use pseudonyms whenever possible.

What student data are researchers permitted to use?

- Students must provide a FERPA release for the use of any course materials and grades.
- Student data may be made available upon request of the Office of Institutional Research for grant submissions.

What if my proposed research involves minors?

- Research activities involving minors require an IRB Expedited (level 2) Application, along with a minor Assent and Parental Permission.

Can student PIs as Primary Contacts remain on study post-graduation?

- Prior to the student's departure, the Faculty Advisor may assume the PI Primary Contact role to continue the project following approval from humansubjects@MiamiOH.edu and the student may be added to the Personnel Form as an external collaborator.

Institutional Animal Care and Use Committee (IACUC)

Animal Care and Use in Research & Teaching

Any research or teaching activities using live vertebrate animals requires an IACUC protocol.

How do I submit a new proposal?

- Keep in mind a timeline. Allow 4-5 weeks for completion of the review process.
- Access new applications at [New Project Application Forms](#) on the [ORI website](#).
- Assemble your personnel and ensure all requirements are met.
- Submit proposals and personnel form to animalcare@MiamiOH.edu via the researcher's email. You will receive confirmation when the IACUC is ready to review the application.
- Researchers will be contacted for additional information or modifications necessary to obtain approval. This process can take several weeks to complete.
- Submission does not guarantee approval. Researchers must receive an approval letter via email from the IACUC Chair and have all personnel requirements completed before any animal research commences.
- No annual reports are due; Numbers of USDA-regulated species used in the protocol must be collected. The PI holds responsibility and accountability for the research activities (animal and non-animal) conducted in the lab.

How to add personnel to an Approved IACUC Protocol

Required Courses and Enrollment:

Miami University requires faculty, staff, lab technicians, students, volunteers, and visitors working with animals under the auspices of the university to participate in the Occupational Health & Safety program and complete training. PIs and personnel must obtain clearance to work with animals in research/teaching and complete appropriate training before having direct contact or exposure to animals.

Participate in the Occupational Health and Safety Program

Researchers and their personnel working with animals must return the Part C - Form C via email to animalcare@MiamiOH.edu prior to receiving access to the Laboratory Animal Resource (LAR) Facility and being added to an IACUC-approved protocol. For access to the Animal Exposure and Health History Form and Steps for Health Screening, please use the following link for [Post-Approval Modification and Reporting Forms](#). Provide your email address and select Animal Exposure and Health History Form and Steps for Health Screening.

Complete the Online Training Module:

1) Collaborative Institutional Training Initiative (CITI)

Collaborative Institutional Training Initiative (CITI) **Working with the IACUC** course completion is required for all personnel, including principal investigators, staff, research assistants, postdoctoral fellows, graduate students, undergraduate students, or any additional individuals working with the animals for research or teaching, whether in a laboratory, observation or wildlife setting.

- Please see the ORI [Training and Certification](#) for assistance with CITI account setup.
- Completed the training at another institution? Affiliate that account with Miami University on the Welcome Page.

2) Animal Care and Use (Research Personnel) Canvas Course- formerly known as AC Orientation Training

Animal Care and Use (Research Personnel) is available online in Canvas. Self-enroll in the course [Animal Care and Use \(Research Personnel\)](#) or visit MiamiOH.instructure.com/enroll/XYJ49P

Frequently Asked Questions:

How do I know if my research requires an IACUC protocol? The following activities are some examples that require a protocol. This is not an exhaustive list.

- The animals are owned or purchased with funds from Miami University.
- The research or activity involves free-living vertebrates in the wild or laboratory.
- The activity involves more than unobtrusive observation of animals in their natural habitat.
- External funds for the project will be administered through Miami University.
- The activity utilizes or teaches surgical or collection techniques or involves any medical or veterinary procedures.
- The activity involves any of the following, including, but not limited to, trapping, banding, behavioral modifications, sedation, surgery, euthanasia, or any potential to cause harm or materially alter the behavior of the animal or potentially harm the investigator.
- The activity uses only observation or restraint that is momentary, such as manually holding a small animal to allow students to observe identifying characteristics, entering a habitat, or creating care or enrichment that could modify the species' behavior.

NOTE Regarding avian and other egg-laying vertebrate species:

Although avian and other egg-laying vertebrate species develop backbones prior to hatching, OLAW interprets the PHS Policy as applicable to their offspring only after hatching. The egg-laying adult animal is covered by the Policy. OLAW expects Assured institutions to have policies and procedures in place that address the care or euthanasia of animals that hatch unexpectedly.

If your study reflects any of the above statements, your project requires an IACUC approval. Remember, this is not an exhaustive list. Contact the Office of Research and Innovation at 513-529-3608 or animalcare@MiamiOH.edu for assistance.

Useful links:

Office of Research and Innovation:

MiamiOH.edu/research-innovation/index.html

Research Ethics, Integrity and Compliance:

MiamiOH.edu/research-innovation/departments-offices/research-compliance/index.html

Animal Care and Use:

MiamiOH.edu/research-innovation/departments-offices/research-compliance/animal-care-use/index.html

Collaborative Institutional Training Initiative (CITI) and Animal Care and Use (Research Personnel) Canvas Course Guidance:

[Training and Certification](#)

Material Transfer Agreements:

See the [Materials Transfer and Data Use Agreements \(MTAs and DUAs\)](#) section of this document.

Institutional Biosafety

The Institutional Biosafety Committee (IBC) was established under the NIH Guidelines for Research Involving Recombinant or Synthetic Nucleic Acid Molecules to provide local review and oversight of nearly all forms of research utilizing recombinant or synthetic nucleic acid molecules. The IBC also provides review and oversight of experimentation that involves infectious agents and other potentially hazardous biological materials.

Application Submission Process

To begin the application process:

1. Visit: MiamiOH.edu/research-innovation/departments-offices/research-compliance/biosafety-rd-na/application-process.html
2. Click on “Access The IBC Forms” within the “Application” text box.
3. Download the appropriate forms to your computer and complete them.
 - a. All applicants are required to complete “IBC Application – Main Form.docx.”
 - b. Subsequently, complete all other forms (A through E) that are relevant to your research or teaching labs.
4. Submit the completed forms to biosafety@MiamiOH.edu to begin the review process.

Initial Review

Once an application has been submitted, the Office of Research and Innovation will distribute the application to the Institutional Biosafety Committee for review. ORI will make a determination, based on the information included in the application, regarding the training required of each researcher listed on the application. This information will be communicated directly with each researcher. ORI and the Environmental Health and Safety Office will perform a joint inspection of the lab space(s) identified on the application to ensure that the space is adequate to perform experiments with the agents identified in the application.

Revisions

After reviewing the application, additional clarification or information may be needed from the Primary Investigator. ORI will contact the PI directly regarding any requests for additional information. The PI shall respond to each comment directly from the information provided by ORI and make revisions to their application based on the IBC reviewer's comment via biosafety@MiamiOH.edu. The revisions will be provided to the IBC by ORI.

Final Review and Decision

The application and any revisions will be reviewed by the IBC at a convened meeting. A formal vote will occur so long as a quorum is present. Once a decision has been made by the IBC to approve, conditionally approve, or request modifications, ORI will communicate this information to the PI.

Personnel Changes

Once a protocol has been approved, it is expected that the personnel listed on the protocol will change over time. To add or remove a researcher from a protocol, email a request to biosafety@miamioh.edu with the IBC protocol number, researcher name, and researcher email

address. PIs will receive a form via DocuSign requesting a signature for the requested changes. PIs will also be sent a reminder four times annually requesting personnel changes.

FAQs

Do I need to submit an application for IBC review?

Principal Investigators and course instructors are required to submit an application to the Office of Research and Innovation for IBC review if their research and/or teaching labs utilize recombinant or synthetic nucleic acid molecules, infectious agents, or other potentially hazardous biological materials. This may include BSL-1 agents.

I do not receive NIH funding. Do I have to submit an application for IBC review?

Yes. Per Section I-D of the NIH Guidelines, “as a condition for NIH funding of recombinant or synthetic nucleic acid molecule research, institutions shall ensure that such research conducted at or sponsored by the institution, irrespective of the source of funding, shall comply with the NIH Guidelines.”

My research may be listed under Section III-F – Exempt Experiments in the NIH Guidelines. Do I have to submit an application for IBC review?

Yes. The Miami University IBC does not allow self-exemption from the NIH Guidelines. The IBC must review your application before making this determination.

I have completed all of the assigned training but all of the personnel listed on my application have not. Can the application still be approved by the IBC?

You may receive conditional approval from the IBC pending the completion of training. Your application will not be approved until all researchers have completed all assigned training.

I have been assigned training. Do I have to provide funding for it?

No. All training assigned by the Office of Research and Innovation is free to researchers. Instructions to access the training are provided at the time of assignment by the Office of Research and Innovation.

What biosafety levels are permitted at Miami University?

BSL-1, BSL-2, and BSL-2+. Miami University prohibits BSL-3 and BSL-4 agents.

How often do I need to renew my application?

The expiration date of each protocol is three years after the date of initial approval.

How often will my lab space(s) be inspected?

The lab space(s) listed in your application will be inspected initially during the IBC review process. Once your protocol is approved, your lab space(s) will be inspected at least once annually. All lab inspections will be scheduled with the PI.

Do I need a Material Transfer Agreement (MTA) for biological materials I receive from other academic institutions?

Yes. See the [Materials Transfer and Data Use Agreements \(MTAs and DUAs\)](#) section.

Where can I find additional information resources regarding biosafety?

[NIH Guidelines for Research Involving Recombinant or Synthetic Nucleic Acid Molecules](#)
[CDC Biosafety in Microbiological and Biomedical Laboratories, 6th Edition](#)

Please email biosafety@MiamiOH.edu for all additional questions.

Laboratory Safety

Chemical Hygiene Plan

The Environmental Health and Safety Office (EHSO) has developed a [Chemical Hygiene Plan](#) for all Miami University employees, students, and visitors who use or enter spaces containing hazardous chemicals. The Chemical Hygiene Plan includes topics such as general laboratory practices, personal protective equipment (PPE), and information pertaining to various chemical classifications. Please contact ehso@miamioh.edu for any questions pertaining to the Chemical Hygiene Plan.

Safety Data Sheets

Miami University has acquired access to Chemwatch. Chemwatch provides access to tens of thousands of Safety Data Sheets (SDS). Please visit [Chemical Safety | Lab Safety | Physical Facilities | Miami University](#) and select "Chemwatch" for access. Please note that Chemwatch is only available on the Miami University network or through VPN. Please contact ehso@miamioh.edu for any questions regarding Chemwatch.

Chemical Inventory

Miami University has acquired access to Quartzy. Quartzy is an inventory management system that can be utilized for chemical inventory. Please visit [Quartzy | Manage inventory](#) and log in with Google utilizing your Miami University credentials for access. If an inventory has already been created in Excel or Google Sheets, there is a template available that can be used to upload your inventory into Quartzy. Please contact labsafety@miamioh.edu for additional information.

Training Opportunities

Lab safety training is available to all Miami University faculty, staff, and students through the [CITI Program](#) at no cost. In order to access the [CITI Program](#), please create an account with CITI using your Miami University email address. Please do not use the same password as your Miami email. The following lab safety training modules are currently available:

- Fundamental Concepts of Laboratory Chemical Safety
- Chemical Storage and Segregation
- Emergency Planning
- Chemical Fume Hoods
- Hazard Identification and Risk Assessment
- Personal Protective Equipment (PPE) When Using Hazardous Chemicals
- Compressed Gas Cylinders

Please contact the Office of Research and Innovation with any questions at labsafety@miamioh.edu.

Methylene Chloride

The U.S. Environmental Protection Agency has implemented new regulations for methylene chloride (dichloromethane) by including it as a regulated substance under the Toxic Substances Control Act (TSCA). As a result, there are efforts that Miami University and anyone at Miami

University who uses dichloromethane must undertake to be compliant with the new regulations. Please contact labsafety@miamioh.edu if your lab currently uses or intends to use methylene chloride (dichloromethane).

Financial Conflict of Interest and Conflict of Commitment

At the Time of Proposal Submission

Faculty and staff at Miami are bound by Miami Policies to manage issues regarding perceived or real Financial Conflict of Interest (FCoI) and Conflict of Commitment (CoC).

Miami must have a new FCoI/CoC Disclosure for all covered individuals listed on a federal proposal. Covered individuals named in the budget or budget justification, whether they are Miami personnel or subrecipient organization personnel, need to complete the FCoI/CoC Disclosure Form before proposal submission.

At the Time of Award

Upon receipt of the award notice, and to open the award, all covered individuals engaged in research activities supported by the award, including those of the subrecipient Investigator(s), must complete BOTH the [FCoI/CoC Disclosure](#) and the [CITI COI Public Health Service Course training](#). A "covered individual engaged in research activities" is a person, regardless of title or position, who designs, conducts, or reports research. These persons may include, but are not limited to principal and co-principal investigators, all listed senior personnel or other key personnel, research associatesassistants, postdoctoral fellows, graduate students, and undergraduate students.

FCoI/CoC Disclosures

FCoI/CoC disclosures for engaged covered individuals must be completed at least annually and the CITI FCoI/CoC training must be completed at least once every four years for most (every 2 years for DoE). Covered individuals at subrecipient institutions may bypass these requirements if they can demonstrate that they are following FCoI/CoC policies at their home institution.

Miami's current FCoI/CoC policy can be found in the [University Policy Library](#).

Details below provide information on how to complete the FCoI/CoC Disclosure and CITI CoI PHS training:

Submitting an FCoI/CoC Disclosure

Visit and complete the [FCoI/CoC Disclosure](#) online. For the form, please use the Cayuse number referenced above.

CITI FCoI/CoC Training

Please review the [FCoI/CoC Guidance](#) for how to add the COI Public Health Service course in CITI and find pertinent links to resources. Visit [citiprogram.org](#) online and take the CITI COI Public Health Service Course.

In addition, all of the covered individuals listed above must also complete the CITI COI-PHS-Basic Course at least every four years (more frequently per sponsor). A new disclosure is required within 30 days of discovering or acquiring a new potential FCoI/CoC.

Research Security Training

At the Time of Proposal Submission

For each proposal to a federal agency, all individuals identified as senior/key personnel must have completed the requisite Research Security Training (RST) within 12 months prior to proposal submission.

CITI Research Security Training

Please review the [Research Security Training Guidance](#) for how to add the Research Security Training (Combined) course in CITI and find pertinent links to resources. Visit [citiprogram.org](#) online and take the Research Security Training (Combined).

Which training should I take, the 4-hour course or the 1-hour course?

You can achieve the Research Security Training (RST) requirements through completing the 1-hour condensed RST module. In CITI, this is referred to as the Research Security Training (Combined) course. The condensed RST module is designed to meet the government-wide RST requirement in Section 10634 of the CHIPS and Science Act of 2022 (42 U.S.C. § 19234). To that end, NSF, NIH, DOE, and DOD all recognize completion of the condensed module as compliant with their respective RST requirements.

Why are there two versions of the training?

The National Science Foundation (NSF), in partnership with the National Institutes of Health (NIH), the Department of Energy (DOE), and the Department of Defense (DOD), has provided four 1-hour online research security training (RST) modules as a resource to awardee organizations. Subsequently, the [SECURE Center](#) developed an updated and condensed version of the four modules.

What are the requirements from federal funders?

National Science Foundation (NSF)

[Important Notice No. 149](#) outlines the requirements from NSF.

National Institutes of Health (NIH)

[NOT-OD-25-133](#) outlines RST requirements, particularly with respect to Other Support documents.

Department of Energy (DOE)

The [DOE RST requirement webpage](#) outlines requirements from DOE.

Material Transfer and Data Use Agreements (MTAs and DUAs)

Types of Agreements

DUA: Data Use Agreement (allows you to use data generated elsewhere)

MTA: Materials Transfer Agreement (allows for transfer of materials to/from Miami)

NDA: Non-Disclosure Agreement (allows for confidential discussions)

When are Agreements Needed?

To protect authorship, IP, and you as the researcher, contact ORI prior to sending OR receiving any materials, technology, or data:

- with U.S. person or with non-U.S. person
- inside or outside the U.S.
- by electronic transmission (such as email)
- by hand-delivery
- by shipment (via Miami or personally)
- to or from anyone in research group
- at time of move to Miami or at any other time
- in the form of digital, cloud-based, physical, or any type of material (biological, chemical, component, etc.)
- through purchase outside Miami Procurement (such as on your behalf by a friend/colleague)

Materials Requiring an MTA

Regardless of whether research is funded through Miami or through an external grant or contract, materials that require an MTA include, but are not limited to:

- cell lines
- plasmids
- nucleotides
- proteins
- transgenic animals (such as mice, rats, fish, etc.)
- tissues (plant, animal)
- plant varieties
- bacteria
- pharmaceuticals
- other chemicals
- geological samples

When is a DUA not needed?

1. When data is publicly available in public domain.
2. When data is exchanged that is not subject to a legal or other restriction on its use.
3. When de-identified data is exchanged for research purposes under a subcontract or other form of agreement with the recipient.

When is a DUA needed?

1. Data is proprietary.
2. There is no plan to disseminate (to publish) the work.
3. Federal or state statutes limit dissemination.

Cautionary Notes on Contracts, MTAs, NDAs, and DUAs

Do not sign a contract, NDA, MTA or DUA on your own – send it to ORI and we will work with you.

Be wary when a contract includes:

- Obligation to publish in specific journals
- Obligation to share information that may be confidential
- Obligation to withhold information from home institution or funding agency
- Obligation to hire or provide career advancement opportunities to other participants
- Obligation to provide pre-publication data
- Not following proper hiring and recruiting procedures
- Not going through normal university contracting process
- Only non-English language
- Rushed turn-around

Submitting an MTA or DUA Request

To submit a request, use Cayuse Innovate, our module for managing all intellectual property matters including invention disclosures, NDAs, MTAs, and Data Use Agreements.

1. Visit <https://miami.innovatehosted.com/innovate/public/auth>
2. Click on MU Users
3. Login using SSO
4. In the menu bar of the web page, click on “Forms”
5. Click on “Fill Out New Form” at the top right
6. Select “Data Use Agreement Form,” “MTA In Request Form,” “MTA Out Request Form”, or “NDA/CDA Request Form”
7. For the form, you will need to have contact information for the investigator at the other institution. You will also want to add yourself by typing your name into the search bar under item 7 and then selecting yourself from the list that pops up

8. Once you have entered information in all of the required fields, you can submit the form. The page has a helpful “Validate” button which can be used as a check before submitting.

After the form is validated and submitted an email alert will be generated to indicate the submitted request. The document will be uploaded once it has been fully executed.

International Travel, Export Control, and Working with Non-U.S. Persons

Definitions

Federal laws and regulations govern how we share tangible research materials (e.g., code, data, technology) and how we share ideas regardless of whether the work is or is not funded by a grant or contract. Export control exists for reasons of:

- National security
- Prevention of terrorism
- Prevention of the proliferation of weapons of mass destruction
- U.S. foreign policy interests
- Preservation of U.S. economic competitiveness

Export control regulations apply to all Miami faculty, undergraduate students, graduate students, and staff.

Collaboration

The term “collaboration” includes such activities as

- sharing of information (e.g., data, measurements, instrumentation, know-how) verbally, through electronic communication, or any other means,
- performing any measurements or procedures,
- or undertaking any review, editing, writing, or analysis toward publication.

Collaborator

The term “collaborator” includes undergraduate and graduate students at any institution, Miami University employees, and any other U.S. or non-U.S. person inside or outside the United States.

Export Control Training

Please reach out (ori@MiamiOH.edu) any time that you have questions.

Please find the [Export Controls CITI Completion Guidance](#). In short, go to My Courses > Add a Course > Select Q#4 Export Controls.

Traveling internationally or working with International collaborators?

Review the [International Travel and Collaborator Information on the ORI website](#) and complete a [Non-US Persons and Non-US Institution Collaboration form](#) submission.

ORI is a resource for students, faculty, and staff and aims to provide guidance for international travel and for working with collaborators both here in the US and internationally.

Will you be inviting an international scholar to visit Miami?

Submit an [application](#) for approval.

Will you be traveling internationally with University-owned electronic devices?

Equipment Registration Requirements

Pre-Trip Checklist

Before international travel, review the [International Travel and Collaborator Information on the ORI website](#) and complete an [International Travel form](#).

- After completing the International Travel form, our office will determine if an [Electronic Export Information \(EEI\) filing](#) is required when shipping or hand-carrying University-owned items (including laptops and smart devices) that fall into one of the two categories:
 1. The total cash value of the item(s) is higher than \$2,500, or
 2. The items are destined for China, Hong Kong, Macau, Russia, or Venezuela, regardless of the item(s) cash value
- If anyone in your party is carrying:
 - A Miami-issued laptop and/or smart device that meets the above criteria
 - Tools of the trade or equipment that meet the above criteria
 - Encrypted software that includes the source code or object code
 - Unpublished technical insight and knowledge that has publication restrictions
 - Data or technology not yet published that has publication restrictions
 - Chemicals, biologicals, scientific equipment, etc.
 - Blueprints, drawings, and schematics that have publication restrictions
 - Restricted information
 - Restricted technology or data at “closed” conference or meeting (a meeting that is not open to all technically qualified members of the public)

For any questions contact the Office for Research & Innovation at ori@miamioh.edu at least two weeks prior to your travel.

Objective of the equipment registration process

- To provide information regarding certain conditions for which registration is required for anyone carrying a laptop or any electronic device on international travel
- To provide information regarding certain conditions for which registration is required for anyone carrying software, unpublished or published knowledge, unpublished data or technology, scientific equipment, published material, or restricted information, technology, or data on international travel

Additional Policies

Human Subjects Research

For IRB-related research, please review the [International Compilation of Human Research Standards](#) for all international research.

Conducting Research in the European Union

Please review the [GDPR Guidance](#) for conducting research in the EU.

Miami University Policy Library

The associated Miami policy can be located [here](#).

The “Fundamental Research Exclusion”**Fundamental Research is defined as:**

“Basic and applied research in science and engineering, the results of which ordinarily are published and shared broadly within the scientific community. As distinguished from proprietary research and from industrial development, design, production, and product utilization, the results of which ordinarily are restricted for proprietary or national security reasons.”

When Fundamental Research Exclusion Applies	When Fundamental Research Exclusion No Longer Applies Includes the Following (plus other circumstances)
The results are published and shared broadly within the scientific community And Research is conducted at an accredited institution of higher education in the U.S.	Work is done outside the U.S. (even if conducted abroad at an institution that is affiliated with Miami)
	Grant or contract forbids participation of non-U.S. person
	Sponsor is given right to approve publications
	Sponsor limits access or disclosure of research results
	Sponsor and PI enter side deal (extra-contractual agreement) that limits open access to research results
	Sharing fundamental research with a non-U.S. collaborator to take the research a step further

How is the Fundamental Research Exclusion determined?

Much, but not all, of the research at Miami falls under the Fundamental Research Exclusion

Reach out to ORI (ori@MiamiOH.edu) for guidance in applying the Export Control Decision Tree.

Responsible Conduct of Research (RCR)

What is Responsible Conduct of Research?

The National Institute of Health (NIH) defines Responsible Conduct of Research (RCR) as “the practice of scientific investigation with integrity. It involves the awareness and application of established professional norms and ethical principles in the performance of all activities related to scientific research.”

The National Science Foundation (NSF) states that responsible and ethical conduct of research (RECR) is critical for excellence, as well as public trust, in science and engineering. RECR involves not only a responsibility to generate and disseminate knowledge with rigor and integrity but also a responsibility to:

- Conduct peer review with the highest ethical standards.
- Diligently protect proprietary information and intellectual property from inappropriate disclosure.
- Treat students and colleagues fairly and with respect.

Responsible Conduct of Research Training (RCR) – (NIH)

NIH requires RCR training for all trainees, fellows, participants, and scholars receiving support through any NIH training, career development award (individual or institutional), research education grant, and dissertation research grant. This is to be completed at each career stage and no less than every four years.

Responsible and Ethical Conduct of Research Training (RECR) - (NSF)

NSF requires an institution to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduate students, graduate students, postdoctoral researchers, faculty, and other senior/key personnel who will be supported by NSF to conduct research.

Responsible Conduct of Research Topics

Topics may include, but are not limited to, the following:

- Research Misconduct and policies for handling misconduct
- Conflicts of Interest & Commitment - personal, professional, and financial
- Mentor & Mentee Responsibilities and Relationships
- Peer Review
- Responsible Authorship & Publication
- Collaborative Research including collaborations with industry
- Protection of Human Subjects
- Protection of Live Vertebrate Animal Subjects
- Safe Laboratory Practices
- Data Acquisition and laboratory tools, management, sharing, and ownership
- The scientist as a responsible member of society
- Contemporary ethical issues in biomedical research

- Environmental and societal impacts of scientific research

Modalities for Responsible Conduct of Research Training

RCR training requirements can be met using a variety of training modalities.

- It is recommended that in-person training provided by the university be augmented with ongoing discussions in research group meetings.
- In meeting the required 8 hours of RCR training, we recommend that at least 6 of those hours be in person.
 - Online or virtual training resources and courses can also be used.

Miami University has developed new RCR curricula for training. Implementation of these sessions began in Spring 2025. For more information, contact Julie Robinson, robins48@miamioh.edu or (513-529-3608).

Volunteers and the Minors on Campus Policy

If you will work with children under the age of 18 on campus (e.g., leading field trips or educational programming) who are not enrolled or accepted for enrollment at the university, you and your personnel are required to follow Miami University's [Minors on Campus Policy](#).

Laboratories

According to the [Minors on Campus Policy](#), "*Minors, unless enrolled in a Program that requires their presence in, are absolutely restricted from "safety sensitive" areas such as laboratories, machine shops, mechanical rooms, steam plant, construction areas, maintenance garages, animal care or research facilities, food preparation areas, security areas and areas from which the general public or students are denied access.*"

Training

All program leaders, program staff, and volunteers who will be working with minors in a program or activity must complete the required online [Minors on Campus training](#) and [register the activity](#) with the Miami University Police Department.

Human Resources - Volunteering

Miami recognizes that a significant number of individuals wish to volunteer their time, energy, and talents to the University, and the University will benefit from that service. Please view the [Volunteering web page from Human Resources](#) to learn more about requirements and policies related to volunteers.

Risk Management - Protection of Minors

Miami University is committed to providing a safe environment for all members of the University community as well as all those who participate in programs and activities on campus or who use or visit campus facilities. Please view the [Protection of Minors web page](#) for more information.

More Information

To learn more about Minors on Campus at Miami University, check out the following.

- [Minors on Campus Policy](#)
- [Registration of Programs and Activities Involving Minors on Campus](#)
- [Minors on Campus Training](#)

Additional Questions?

If you have questions, contact:

- Andrea Crane-Coyle (cranecac@MiamiOH.edu),
- or Rosanne Gulley (gulleycr@MiamiOH.edu).

Administration of Controlled Substances and Dangerous Drugs in Research

How to Determine if a License is Needed for Use of a Chemical for Research

To obtain, synthesize, and administer controlled substances or dangerous drugs in Miami University Institutional Animal Care and Use Committee (IACUC) approved animal or in vitro research, an investigator must be either a registrant or an authorized agent. Researchers are required to use pharmaceutical-grade drugs in animal research. Generally, this includes the use of controlled substances and dangerous drugs (human and veterinary prescription drugs).

Important Considerations

- Pharmaceutical-grade substances are required for use in human and animal subject research
 - The use of a non-pharmaceutical grade substance may result in a reportable incident to the federal agency with oversight for the research
 - In some instances, approved use may be sought from the Institutional Animal Care and Use Committee (IACUC) for use in research animals
- If granted, documentation must be in place prior to the first use
 - Of special note in the State of Ohio
 - Use of any prescription requires an Ohio Board of Pharmacy (OBP) license
 - Because of this requirement, prescribed substances for any research (including in vitro, non-human and non-research animal research) requires an OBP license.
 - This requirement may be very new to you if you had not worked previously in the State of Ohio.

The following information is available to assist you in determining if use of an item requires an OBP license, a Drug Enforcement Agency (DEA) registration, or both.

Guide for determining OBP and DEA requirements:

1. Go to the vendor site.
 - a. Vendors commonly used at Miami University are:
 - i. Midwest Veterinary Supply, Covetrus, Henry Schein Medical, and Millipore Sigma
2. At the vendor site, search for the specific item
3. If the item information includes information such as the following, the item requires DEA registration for use
 - a. Statement such as this product:
 - i. Is a “Class 2” (or another #)
 - ii. Is a “2N drug” (or another #)
 - iii. Requires a DEA Form 222
 - iv. Packaging indicates “C-II” (or another Roman numeral)
 - v. Packaging includes “C”
 - vi. Website has warning symbol, such as a red diamond, that indicates “controlled drug”
4. If the item information includes information such as the following, the item requires an OBP license for use
 - a. Indicates Rx on the label
 - b. Statement such as this product:
 - i. Is a prescription drug
 - ii. Can only be sold to a licensed practitioner

5. If the item information does not include any of the above:
 - a. Call the distributor to verify
 - i. Whether the product is pharmaceutical grade
 - b. Caution: an item may be available without a prescription designation but the item may not be pharmaceutical grade
 - i. This is common at chemical distributors such as Millipore Sigma and would not meet the requirement for pharmaceutical grade
 - ii. Contact Sue McDowell for guidance (mcdowes2@MiamiOH.edu)
 - iii. Verify with IACUC or IRB chair the allowability for use

Definitions

OBP: Ohio Board of Pharmacy

DEA: Drug Enforcement Administration

Registrant: an investigator who registers with OBP to administer dangerous drugs and/or who registers with DEA to administer controlled substances

Authorized Agent: an investigator, staff member, or student whom the Registrant authorizes to use Controlled Substances/Dangerous Drugs under their license

Controlled Substances: drugs regulated by the DEA. Examples: ketamine, cocaine, narcotic analgesics

Dangerous Drugs: any drug requiring a prescription or labeled as "prescription only"

Examples: prescription antibiotics, non-narcotic analgesics, isoflurane

ORI: Office of Research and Innovation

TDDD: Terminal Distributor of Dangerous Drugs

Procedure

Step 1 – Register with OBP and/or DEA

To Register with OBP

1. Receive IACUC protocol approval if drugs will be used in animal research
2. Receive IRB protocol approval if work is to be with human subjects
3. Receive Institutional Biosafety Committee approval if work includes infectious agents and/or nucleic acids
4. Submit a Miami Controlled Substance Registration fillable form. Contact ORI (mcdowes2@MiamiOH.edu)
5. Contact Jazzminn Hembre (hembrejl@MiamiOH.edu) for detailed information on room location to use in registration if a locker is needed in the shared room
6. For the license, use Miami University – YOUR NAME Lab (in the past we only stated Miami University and it was requested that we distinguish further for regulator's purposes)
7. Use as the address for storage the specific building and room # (not the general address for Miami University)
8. To pay for registration, have your department admin pay the cost with your department's credit card.
9. Send a copy of the receipt to Judy Eaton, Budget and Operations Coordinator in ORI. Judy will contact the department admin with the index code to use when reconciling the charge.
10. Request a TDDD license from the Ohio Board of Pharmacy from their online system.
 - a. https://elicense.ohio.gov/OH_HomePage
 - i. Select:
 1. Pharmacy Board, then Terminal Facility Category 2 (unless seeking DEA registration as well, then select Category 3)

2. If will be using xylazine or xylaxine mixtures, must obtain Category 3 and also must obtain DEA registration per State of Ohio requirements – this may not yet be a federal requirement but is a State of Ohio requirement
 - ii. General Application
 - iii. “Add New Business” to add Miami University
 - iv. Register as Public School
11. Notify Dr. Susan McDowell (mcdowes2@MiamiOH.edu) that you have requested a license.
12. Upon receipt of license, provide documentation to Dr. Susan McDowell (mcdowes2@MiamiOH.edu)

To Register with DEA

1. Receive IACUC protocol approval if drugs will be used in animal research
2. Receive IRB protocol approval if work is to be with human subjects
3. Receive Institutional Biosafety Committee approval if work includes infectious agents and/or nucleic acids
4. Submit a Miami Controlled Substance Registration by emailing Dr. Susan McDowell (mcdowes2@MiamiOH.edu)
5. Contact Jazzminn Hembre (hembrejl@MiamiOH.edu) for detailed information on room location to use in registration if storage will be in shared room with lockers
6. Request a Research registration with the DEA via their online system.
 - a. <https://apps.deadiversion.usdoj.gov/webforms2/spring/main?execution=e1s1>
 - b. No fee (we are a government agency since we are a state school)
 - c. For schedule I research, an additional registration will be required.
 - d. Registrants will most likely need to seek a Non-Practitioner or Research registration
 - e. Registrants who seek to work with Schedule I-V compounds will need two registrations. One for Schedule I and one for Schedule II-V. Registrations can be obtained.
7. Upon receipt of registration, provide documentation to Dr. Susan McDowell (mcdowes2@MiamiOH.edu)

License and registration renewal

1. Responsibility of Registrant to hit deadline
2. Every 2 years for TDDD
 - a. For the license, use Miami University – YOUR NAME Lab (in the past we only stated Miami University and it was requested that we distinguish further for regulator's purposes)
 - b. Use the specific building and room # where substance will be stored (do not use the general address of Miami University – do not state High St)
3. Will vary based on the type for the DEA.
4. To pay for registration, have your department admin pay the cost with your department's credit card.

5. Send a copy of the receipt to Judy Eaton (eatonja@MiamiOH.edu), Budget and Operations Coordinator in ORI. Judy will then contact the department admin with the index code to use when reconciling the charge.
6. Inform Dr. Susan McDowell that you have submitted the renewal (mcdowes2@MiamiOH.edu)
7. Upon receipt of license or registration, provide documentation to Dr. Susan McDowell (mcdowes2@MiamiOH.edu)

Step 2 – Prepare Storage

1. All Schedule III-V controlled substances must be stored in a locked, substantially constructed cabinet. All Schedule I and II controlled substances must be stored in a locked, substantially constructed cabinet, bolted to the floor or wall.
2. The cabinet should not have a glass panel where scheduled substances can be visible from the outside.
3. All scheduled substances must be double-locked (i.e., the storage cabinet must be locked and the room itself must remain locked).
4. All scheduled substances must be stored at the location address on the DEA registration and the Board of Pharmacy license.
5. Registrants and authorized users must take all precautions to guard against theft. This includes, but is not limited to:
 - a. Restricting the number of keys that access the scheduled substances
 - b. Restricting the number of authorized agents that have access to keys
 - c. Changing combination codes, if combination locks are used, during staff turnover
 - i. Upon departure from the university, new locks are to be installed
6. All dangerous drugs (non-controlled prescription drugs) must be stored in assigned locker or secure location, secured by a physical barrier with suitable locks, which may include a substantially constructed cabinet or safe, drawer, locked room, or secured facility.

Step 3 – Prepare Use Records

1. Registrants keep the following records using Miami-generated forms (use DEA forms where required)
 - a. Annual Inventory
 - b. MU human subjects Usage Log_Dangerous Drug_OBP
 - c. MU OBP_Regulated_Disposal Log
 - d. MU Animal Usage Log_Dangerous Drug_OBP
 - e. MU Dilution and Usage Log
 - f. MU Usage Log _Non Animal_DEA
 - g. MU Usage Log-Animals_DEA
 - h. Isoflurane in Research Use Log
2. Maintain log in secure location proximal to substances where could be accessed if unannounced DEA or OBP inspection and not accessible to non-Authorized Users
3. Complete log with each use (must be up-to-date by end of business each day)
4. Maintain record of receipt
5. Maintain a copy of the DEA Form 222 used for orders of Schedule I and II controlled substances as a part of this documentation.
6. Maintain all records for 6 years

Additional Requirements for human subjects research

****APPLIES TO HUMAN DRUG ADMINISTRATION ONLY****

Records of administration shall contain the name, strength, dosage form, and quantity of the dangerous drugs administered, the name and date of birth of the person to whom or for whose use the dangerous drugs were administered, the date of administration, and either:

1. For non-controlled substance dangerous drugs: the identification of the health care professional administering the drug.
2. For controlled substance dangerous drugs: the positive identification of the health care professional administering the drug.

Records of dangerous drugs administered which become a permanent part of the patient's medical record meet the requirements of the rule.

If using computerized system to maintain records: security measures to prevent unauthorized access from network or from stand-alone system required AND must be backed up daily

Step 4 – Designate Authorized Agent (if needed) (this would include students, technicians, PIs)**Authorized Agent**

- Cannot store controlled substances in their own space.
- Obtain all **controlled substances** from the Registrant each business day. Return all **controlled substances** to the Registrant at the end of the business day (the decision rests with the Registrant on whether this is required or whether the Authorized Agent can maintain key/access outside business hours)
- Registrant remains legally responsible for all activities of Authorized Agents use of controlled substances
- Registrant determines whether Authorized Agents may have access to cabinets containing non-controlled dangerous drugs with or without daily check-in/check-out with the Registrant
 - Daily log must be maintained
- Is instructed by Registrant on procedure for immediate reporting of compromised access or keys for secured substances
- Complete Miami form for Authorized Agent designees
- Maintains daily log for controlled substances and for non-controlled dangerous drugs they have administered.
- Is not permitted to place orders

Step 5 – Place Orders- Updated for Workday**WARNING: This is critical:**

Before you purchase dangerous drugs, query the board's online roster (elicense.ohio.gov) to confirm any of the following:

1. The seller is licensed to engage in the sale of dangerous drugs in accordance with section 4729.52 of the Revised Code (i.e. wholesaler, manufacturer, repackager, outsourcing facility or 3PL); or

2. The seller is licensed to engage in the occasional sale or distribution of dangerous drugs at wholesale in accordance with rule 4729:5-3-09 of the Administrative Code (i.e. pharmacies or other terminal distributors).

REPEAT this search annually and document your search

- This procedure applies to any material that requires an Ohio Board of Pharmacies (OBP) License and/or a DEA registration to purchase.
- Under no circumstance is it allowable to use P-card or any process other than Workday for purchases. Use of P-card is in violation of university policy and may result in termination of P-card assigned for your use.
- Each Registrant will need to set up an account with each vendor with their DEA and OBP license information.

Per federal and state regulations, only the DEA registrant or OBP license holder is to place orders (Not authorized agent, office administrative staff, students, lab staff). For another individual to place orders, you would need to undertake assignment of a power of attorney. Please know, Miami can revoke your privilege of serving as a registrant or license holder.

1. If you are the DEA or OBP license holder, Within Workday, this is critical: for "spend category", select: SC0573
 - a. Failure to include this circumvents internal controls and may result in restrictions on use of license or registration
 - b. Shipping address MUST BE IDENTICAL to address associated with the license – otherwise the vendor is obligated to not deliver.

Step 6 – Manage Expired Substances

1. Clearly label as expired (any substance with past use-by date)
2. Clearly separate from non-expired substances (place in a box within secured cabinet, for example)
3. Do not use for any procedure

Step 7 – Dispose of Substances No Longer in Use or Expired

1. When registration expires, registrant or licensee is leaving the university, is no longer conducting the research, and/or when the substance is no longer needed, is expired, and/or in excess, controlled substances and dangerous drugs need to be disposed
2. Complete Miami form (obtain from Dr. Susan McDowell, mcdowes2@MiamiOH.edu)
3. Consult ORI and Environmental Health and Safety
4. Undertake disposal with witness from ORI for controlled substances
 - a. May involve use of Drug Buster or RX Destroyer or third-party

Step 8 – Attend DEA or OBP onsite inspections

1. Review inspectors' credentials upon their arrival
2. Contact Dr. Susan McDowell (765-729-2320)
3. Provide access to all records and substances per requests
4. Be prepared to provide inspector access to:
 - a. Ohio Board of Pharmacy TDDD license

- b. Authorized Agents form (signed by those who access the controlled storage space)
- c. Most recent inventory form (within one year)
- d. Current usage logs
- e. Disposal logs (DEA 41 forms), if applicable
- f. Purchasing/receipt forms (including invoices if possible)
- g. Theft/loss form (if applicable)
- h. Miami University SOP on Controlled Substances

Report Losses

Licensees are required to report the theft or significant loss of dangerous drugs (controlled and non-controlled prescription drugs) and drug documents.

- Contact Miami University Police Department immediately - 911
- Contact ORI timely – mcdowes2@MiamiOH.edu
- Contact Office of Dean timely
- Contact Miami Internal Auditor timely 513-529-0545, iacs@MiamiOH.edu
 - Terry Moore mooret@MiamiOH.edu

Resources

- Dr. Susan McDowell - mcdowes2@MiamiOH.edu
- [Inspection guide used by OBP inspectors](#)

Proof of Coverage/Institutional Assurance



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)
7/1/2025

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERNS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Arthur J. Gallagher Risk Management Services, LLC 235 Highlandia Drive, Suite 200 Baton Rouge LA 70810	CONTACT NAME: Adam Young PHONE (A/C, No. Ext): 512-652-2460 E-MAIL ADDRESS: Adam.Young1@ajg.com	FAX (A/C, No):
	INSURER(S) AFFORDING COVERAGE	NAIC #
INSURED Miami University 501 E. High Street 218 Roudebush Hall Oxford OH 45056	INSURER A: Inter University Council - Insurance Consortium	
	INSURER B:	
	INSURER C:	
	INSURER D:	
	INSURER E:	
	INSURER F:	

COVERAGES		CERTIFICATE NUMBER: 1346531917		REVISION NUMBER:		
THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.						
INSR LTR	TYPE OF INSURANCE	ADDL/SUBR INSD WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	X COMMERCIAL GENERAL LIABILITY CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR		IUCIC-GL-JULY 2024-2025	7/1/2025	7/1/2026	EACH OCCURRENCE \$ 5,000,000 DAMAGE TO RENTED PREMISES (EA occurrence) \$ 100,000 MED EXP (Any one person) \$ Not Covered PERSONAL & ADV INJURY \$ 5,000,000 GENERAL AGGREGATE \$ 5,000,000 PRODUCTS - COMP/OP AGG \$ Included \$
A	AUTOMOBILE LIABILITY X ANY AUTO OWNED AUTOS ONLY <input checked="" type="checkbox"/> SCHEDULED AUTOS ONLY Hired AUTOS ONLY <input checked="" type="checkbox"/> NON-OWNED AUTOS ONLY		IUCIC-AL-JULY 2024-2025	7/1/2025	7/1/2026	COMBINED SINGLE LIMIT (EA accident) \$ 5,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
	UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR EXCESS LIAB <input checked="" type="checkbox"/> CLAIMS-MADE					EACH OCCURRENCE \$ AGGREGATE \$ \$
A	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? <input checked="" type="checkbox"/> If yes, describe under DESCRIPTION OF OPERATIONS below	Y / N N / A	IUCIC-GL-JULY 2024-2025	7/1/2025	7/1/2026	X PER STATUTE OTHER E.L. EACH ACCIDENT \$ 5,000,000 E.L. DISEASE - EA EMPLOYEE \$ 5,000,000 E.L. DISEASE - POLICY LIMIT \$ 5,000,000
A	ELL/Professional Liability (Claims Made)		IUC-IC-ELL JULY 2024-2025	7/1/2025	7/1/2026	Aggregate Each Occurrence \$ 5,000,000 \$ 5,000,000
DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)						
Requested entity is included as additional insureds under the General Liability, Auto Liability policies, pursuant to and subject to the policy's terms, definitions, conditions and exclusions, as required by written contract entered into prior to loss. Re: CASTNET research agreement. Wood Environment & Infrastructure Solutions, Inc						

CERTIFICATE HOLDER	CANCELLATION
Wood Environment & Infrastructure Solutions, Inc. Attention: Fitzpatrick Upshaw Kennesaw GA 30144 USA	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.
	AUTHORIZED REPRESENTATIVE

© 1988-2015 ACORD CORPORATION. All rights reserved.