



## Office of Sponsored Projects

# NSF/NIH Workplace Health and Safety Notification Protocol

### BACKGROUND

#### National Science Foundation

The National Science Foundation (NSF) has adopted a no-tolerance policy for sexual harassment, bullying, retaliation, other forms of harassment, sexual assault, hostile working conditions, or any other conditions that raise a concern about workplace health and safety within the agency, at awardee organizations, field sites or anywhere science or education is conducted. As such, NSF includes [a term and condition](#) concerning harassment as part of its award acceptance requirements, which pertains to Principal Investigators (PIs) and co-Principal Investigators (co-PIs) of NSF-funded projects, including co-PIs at subawardee institutions.

For NSF grants awarded to Seattle University after September 21, 2018, this institution's Authorized Organizational Representative (AOR) must notify NSF of any finding/determination if an NSF-funded PI or co-PI has violated SU's policies or codes of conduct, statutes, regulations, or executive orders relating to sexual harassment, other forms of harassment, sexual assault, bullying, retaliation, or hostile working conditions; and/or if the PI or any co-PI has been placed on administrative leave or removed, or if any administrative action has been imposed on the PI or any co-PI relating any finding/determination or an investigation of an alleged violation of awardee policies or codes of conduct, statutes, regulations, or executive orders relating to sexual harassment, other forms of harassment, sexual assault, bullying, retaliation, or hostile working conditions.

#### National Institutes of Health

The National Institutes of Health (NIH) is also addressing sexual harassment and other forms of bullying, retaliation, and harassment on NIH-funded projects, citing a [2018 National Academies report](#) that states "federal agencies may be perpetuating the problem of sexual harassment." NIH requires all institutional grantees to have developed, disseminated and implemented policies and practices that foster a harassment-free environment, maintain a clear code of conduct, ensure employees are aware of internal policies and external laws, provide an easy way to report harassment, protection from retaliation, and respond promptly to allegations.

For NIH grants awarded to Seattle University, the institution must notify NIH when individuals identified as PD/PI or other Senior/Key personnel in an NIH notice of award are removed from their position or are otherwise disciplined by the recipient institution due to concerns about harassment, bullying, retaliation or hostile working conditions. This notification must be made through NIH's dedicated web form (linked below), and must include, at a minimum, the name of the Authorized Organization Representative submitting the notification, the name of the individual of concern, a description of the concerns, the action(s) taken, and any anticipated impact on NIH-funded award(s).

### RELATED POLICIES & FORMS

[NSF Term and Condition: Sexual Harassment, Other Forms of Harassment, or Sexual Assault](#)  
[NSF Organizational Notification of Harassment Form](#)

[NIH Anti-Sexual Harassment Expectations, Policies, and Requirements](#)  
[NIH NOT-OD-22-129 Updated Requirements for NIH Notification of Removal or Disciplinary Action Involving Program Directors/Principal Investigators or other Senior Key Personnel](#)  
[NIH Notification Dedicated Web Form](#)  
[Seattle University Sexual Harassment Policy \(Appendix C of HR Manual\)](#)  
OSP Proposal Transmittal Form (PTF) Addendum F

## PROTOCOL

1. At the time of submitting a grant proposal to the NSF or the NIH, the PI, co-PIs and any Senior/Key Personnel will be required to submit a signed PTF Addendum F to the Office of Sponsored Projects (OSP) acknowledging their requirement to report any findings, administrative leave or other administrative action that has been imposed related to sexual harassment, other forms of harassment, bullying, retaliation or hostile working conditions to the SU Office of Institutional Equity (OIE).
2. When a new NSF or NIH award is received, the designated Sponsored Research Officer (SRO) will discuss this compliance requirement and the PI/Key Personnel's responsibility to self-report to OIE in the post-award meeting with the PI(s).
3. On a monthly basis, the Office of Sponsored Projects (OSP) will send a list of all active NSF and NIH PI's, Co-PIs, and Senior/Key Personnel to the Office of Institutional Equity (OIE).
4. On an ongoing basis, when OIE notifies a faculty member and their dean about a new investigation related to sexual harassment, other forms of harassment, or sexual assault; or to concerns about harassment, bullying, retaliation or hostile working conditions, information will be included about the requirement to notify OIE if the faculty member is a PI/Co-PI or Key/Senior Personnel on an NSF or NIH award.
5. The OIE will coordinate with the Authorized Organizational Representative (AOR), Bob Dullea, Deputy Provost, to notify NSF of:
  - a. Any finding/determination regarding the PI or any co-PI that demonstrates a violation of awardee policies or codes of conduct, statutes, regulations, or executive orders relating to sexual harassment, other forms of harassment, bullying, retaliation or hostile working conditions; and/or
  - b. if the PI or any co-PI is placed on administrative leave or if any administrative action has been imposed on the PI or any co-PI by the awardee relating to any finding/determination or an investigation of an alleged violation of awardee policies or codes of conduct, statutes, regulations, or executive orders relating to sexual harassment, other forms of harassment, bullying, retaliation or hostile working conditions using the [NSF Organizational Notification of Harassment Form](#).
6. Within 30 days of removal or disciplinary action, the OIE will coordinate with the AOR, Bob Dullea, Deputy Provost, to notify NIH of administrative actions that removes senior/key personnel on an NIH award using the [NIH Notification Form](#), including at a minimum, the name of the Authorized Organization Representative submitting the notification, the name of the individual of concern, a description of the concerns, the action(s) taken, and any anticipated impact on the NIH-funded award(s).

7. Should the NSF or NIH require amendments to the award and/or personnel, OIE will coordinate with the OSP when and as appropriate.

<b>Documentation</b>	<b>Date</b>	<b>By</b>
Initial documentation	7/9/2019	Jenna Isakson (based on discussion with Andrea Katahira & Dave Lance)
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