<div align="center">**UI External Funding Sponsor Harassment Reporting Procedure**</div>

1. Report of sexual harassment, sexual misconduct, discrimination, or harassment based on protected identity arrives at the Office of Equal Opportunity and Diversity (EOD) or the Office of Sexual Misconduct Response Coordinator (OSMRC).

2. If in reviewing details of the report, it is determined that the respondent may be a recipient of external funding, EOD/OSMRC contacts the Division of Sponsored Programs (DSP) or searches the DSP portal in Campus Data to ascertain whether the respondent is a Principal Investigator (PI) or key personnel on an awarded or pending project with external funding. Information about potential reporting obligations to the funding sponsor will be shared with a complainant as they make a decision regarding whether or not to pursue support measures, a formal complaint or an adaptable/informal resolution.

3. If a **formal complaint is filed** alleging a violation of University policies prohibiting sexual harassment, sexual misconduct, discrimination, or harassment based on a protected class by a PI or key personnel with external funding that requires reporting, EOD/OSMRC will advise the DEO, Associate Dean, Senior HR Leader, and/or Provost to consult with DSP, when possible. This consultation should occur prior to imposing interim measures that either places the responding party on administrative leave or imposes any other measure that limits access to University property or personnel. Consultation will help ensure the timing of action is coordinated to allow for prompt compliance with sponsor reporting regulations (within 10-business days of action taken), and allow for workplace continuity and safety issues to be addressed.

4. If a **Notice of Investigation and Allegations** alleging a violation of the Interim Policy on Sexual Harassment and Sexual Misconduct or a Notice of Complaint alleging a violation of the Anti-harassment or Human Rights Policy based on a protected class is issued to a PI or key personnel with external funding reporting obligations <u>and</u> interim measures include the respondent (1) being placed on administrative leave <u>or</u> (2) having limited access to University property or personnel then:
    a. EOD/OSMRC contacts DSP[i] with the name of the responding party for DSP to confirm if the individual is a PI or key personnel with an award subject to reporting requirements.
    b. EOD/OSMRC or Provost/Senior HR Leader provides DSP with interim measure language that describes the measure, including the reason(s) for and conditions of action.
    c. DSP drafts the report as required by the sponsor and shares with the DEO, Associate Dean, Provost or Senior HR Leader, and EOD/OSMRC for rapid turnaround. If action taken requires additional sponsor approval or notification (e.g., asking for a change in PI or interim PI, change in scope, or significant action impacting grant activities), DSP confers with the Provost, DEO, Associate Dean, Senior HR Leader, and others as needed.
    d. DSP completes and submits the notice to the sponsor and requests sponsor approval if needed. The report must occur within the sponsor's reporting period.
    e. OSMRC/EOD informs the complainant that the funding sponsor will be notified.
    f. Senior HR Leader, DEO, Associate Dean, or the Provost informs the respondent in writing that the funding sponsor was notified. Email constitutes acceptable written notice.

5. If a sexual harassment, sexual misconduct, discrimination, or harassment policy violation based on a protected class **is found** and the respondent is a PI or key personnel with external funding that requires reporting:

a. EOD/OSMRC informs DSP about the finding/determination by indicating the respondent has been found to have violated UI policies or codes of conduct, statutes, regulations, or executive orders relating to sexual harassment, sexual misconduct, or other protected class policies.

b. After final action has been taken, EOD/OSMRC, or Provost/Senior HR Leader informs DSP when sanctions imposed include measures that limit access to University property or personnel. Information provided to DSP includes action(s) taken, reason(s) for, and conditions of imposition of administrative action.

c. DSP drafts the harassment report for the external funding sponsor and shares with the DEO, Associate Dean, Provost/Senior HR Leader, and EOD/OSMRC for rapid turnaround. If action taken requires additional sponsor approval or notification (e.g., asking for a change in PI or interim PI, change in scope, or significant action impacting grant activities), DSP confers with the Provost, DEO, Associate Dean, Senior HR Leader, and others as needed.

d. DSP completes and submits the notice to the sponsor and requests sponsor approval if needed. The report must occur within the sponsor's reporting period.

e. EOD/OSMRC informs complainant of notice to the funding sponsor regarding final outcome.

f. Senior HR Leader, Associate Dean, DEO, or the Provost informs the respondent about notice to the funding sponsor regarding final outcome.

6. If a sexual harassment, sexual misconduct, discrimination, or harassment policy violation based on a protected class is **not found** and an interim measure was reported to an external funding sponsor, DSP will coordinate with the Senior HR Leader, DEO, Associate Dean, or the Provost and the respondent to prepare communication to the funding sponsor. DSP will communicate with EOD/OSMRC regarding follow up communication to the funding sponsor. EOD/OSMRC will notify complainant if the funding agency is notified of the outcome.

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i DSP contacts: Wendy Beaver and Lynn Hudachek

Links to Sponsor Policies

National Science Foundation (NSF):

   NSF Sexual Harassment Webpage: https://www.nsf.gov/od/odi/harassment.jsp

   https://www.nsf.gov/od/odi/term_and_condition.jsp

National Institutes of Health (NIH):

   Anti-sexual harassment Expectations, Policies, and
   Requirements https://grants.nih.gov/grants/policy/harassment/policy-requirement.htm

   Notice of Clarification Regarding Harassment and Discrimination Protections in NIH Training
   Applications https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-056.html

   Guidance Regarding Change in Status, Including Absence of PD/PI and Other Key Personnel Named in
   the Notice of Award https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-124.html

National Aeronautics and Space Administration (NASA):

   https://missionstem.nasa.gov/term-condition-institutional-harassment-discr.html

Simons Foundation:

   Grant Code of Conduct: https://www.simonsfoundation.org/funding-opportunities/policies-and-procedures/

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