

**TO:** UNLV Faculty Members, Principal Investigators, Project Directors, and Laboratory Supervisors

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**RE:** Research Information and Responsibilities at UNLV

This document provides formal policy guidance for the conduct of research that is essential to promote a safe, ethical, and productive research environment at the University of Nevada, Las Vegas (UNLV). Every faculty member, Principal Investigator (PI), Project Director (PD), and laboratory supervisor at UNLV is responsible for fostering an environment that enables the highest level of academic inquiry while simultaneously complying rigorously with all federal, state, and University regulations related to the conduct of research. We require each PI, PD and/or supervisor to review and communicate the guidelines outlined in this memorandum with all co-workers and individuals engaged in research.

### **Oversight of Individuals Engaged in Research**

PIs, PDs and/or supervisors are responsible for the oversight of all individuals engaged in research under their direction, whether or not the University compensates the students and/or employees. Likewise, PIs, PDs and/or supervisors are responsible for all students and employees training to ensure safety in the research environment while performing designated tasks. This responsibility extends to visiting scholars, trainees, postdoctoral appointees, graduate students, undergraduate student assistants, staff employees, pre-collegiate students, volunteers, or participants in life-long learning or other special programs. The PI, PD and/or supervisor must ensure that any such person understands and adheres to all applicable regulations, follows all University policies, participates in relevant training (e.g., laboratory and chemical safety, ethical standards, and the responsible conduct of research), and adheres to high ethical standards of honesty and integrity in research.

### **Responsible Conduct of Research (RCR)**

All faculty must personally engage in responsible and ethical research practices, and encourage ethical behavior in trainees, fellows, participants, and scholars (graduate and undergraduate students and postdoctoral scholars). Education related to responsible and ethical research practices is available to all members of the UNLV community engaged in the oversight or production of research, and faculty should ensure that members of their research team are educated regarding general research practices, as well as those consistent with disciplinary norms. To aid this process, a formal RCR training course is offered at UNLV. Faculty with funding from NIH (NOT-OD-10-019), NSF (SEC. 7009 of the America Competes Act), or USDA-National Institute of Food and Agriculture (NIFA) (June 2017:

USDA/NIFA Research Terms and Conditions) must ensure trainees fellows, participants, and scholars complete this RCR course as it is required for all research funded by these agencies. All other faculty are also encouraged to send their trainees to RCR training. Further, faculty with funding from these federal sources are also required to complete RCR education.

RCR training is offered fall and spring semesters, and instructors are experienced faculty members. Topics include: general ethical responsibilities in research; collaborative research; mentor/trainee responsibilities; acquisition, management, sharing, and ownership of data; publication practices and responsible authorship; peer review; conflicts of interest and commitment; and research misconduct. Find out more about [responsible conduct of research training](#).

### **Misconduct in Research and Other Scholarly Activities**

PIs, PDs and/or supervisors are expected to adhere to the highest ethical standards when conducting research and scholarly work. Misconduct in research and scholarly activities is contrary to the standards of the University. Read more about the definitions of misconduct and procedures for handling allegations of misconduct [here](#).

### **Conflict of Interest (COI) and Compensated Outside Service**

UNLV promotes objectivity in research by carefully reviewing any potential conflicts of interest or commitment. All UNLV faculty and staff must complete a [Conflict of Interest and a Compensated Outside Services Disclosure](#) annually, and at the initiation of a new project that involves a potential conflict or outside compensation. Approval must be obtained prior to initiating any research or compensated outside activities. Federally-funded PIs are subject to additional requirements, such as mandatory COI training.

### **Export Control**

All research projects must be in compliance with federal export laws and regulations. The University and all its employees are required to comply with the laws and implementing regulations issued by the Department of State through its International Traffic in Arms Regulations (ITAR), the Department of Commerce through its Export Administration Regulations (EAR) and the Department of Treasury through its Office of Foreign Assets Controls (OFAC). Find out further information regarding [export control requirements](#).

### **Responsibility for Management of Sponsored Projects**

University faculty and staff members who direct sponsored projects have the principal responsibility to carefully manage these programs. The legal status of the Principal Investigator (PI) or the Project Director (PD) should be clearly understood – the PI or PD, as an individual, is not the recipient of the grant and has not entered into a contract with a sponsor. PIs and PDs do not have signature authorization to enter into a grant/contract

agreement on behalf of the institution. Rather, the Board of Regents has entered into the contract or has been awarded a grant. Grant/contract funds must be spent by the University in accordance with the proposal and as initiated by the PI or PD. Although the University signs the agreement and the University is legally and financially responsible to the sponsor, the PI or PD is responsible for the administration of the project, submission of technical reports, and proper fiscal management of the project. The Office of Sponsored Programs (OSP) provides administrative and financial services to assist in the handling of these responsibilities and has established procedures to help meet federal, state, sponsor, and University administrative requirements. However, the PI or PD are required to monitor expenditures and ensure that they are allowable based on the funding agency requirement or regulations associated with the grant.

One of the most important responsibilities of the PI or PD is to keep track of expenditures and commitments and to prevent expenditures from exceeding the budget or from being used for unauthorized purposes. Even if the responsible account holder designates other persons as "authorized signatures", s/he remains the person solely responsible for ensuring that the project is conducted within the budget or that the account balance is not exceeded. In case of overruns or account deficits, the University holds the PI or PD and their department or college responsible for covering such costs.

Additionally, the PI or PD is responsible for tracking his/her committed effort on sponsored projects, as well as approving the effort expenditures of their funded team members. PIs and PDs may not exceed 100% effort in performing all university duties, which include research, instruction, administration, and other types of effort. Extra compensation is not available on sponsored projects, except in extraordinary circumstances, which should be included at the proposal stage and must be pre-approved.

For additional information please visit the [OSP website](#) and/or contact your OSP representative directly, or contact the office via email at [osp@unlv.edu](mailto:osp@unlv.edu), or by telephone at 702-895-1357.

## **Clinical Trials**

At UNLV, clinical trials (also called randomized clinical trials or RCTs) are supported by federal grants, foundation grants, and industry contracts, including investigator-initiated trials. The [Office of Clinical Trials](#) (OCT) provides comprehensive campus support; providing leadership and guidance, policies and procedures, and knowledge and expertise under one core infrastructure. Additionally, the OCT provides all liaison services between the Principal Investigator and sponsors, developing strategic alliances and partnerships between the two. If the research is clinical or interventional, or if it requires any contractual obligations, the studies must be reviewed by the UNLV OCT which can be reached via email at [cto@unlv.edu](mailto:cto@unlv.edu).

## **Research Agreements**

All agreements related to research activities including, but not limited to, Sponsored Research

Agreements, Memoranda of Understanding, Participation and Cooperative Agreements, Teaming Agreements, Confidentiality and Non-Disclosure Agreements, and Material Transfer Agreements (MTAs) must be processed through the Office of Sponsored Programs (OSP). Biological and chemical materials transferred from the University to another entity, or received by the University from another entity, require the transfer to be completed only after an MTA has been fully executed with the other entity. In many cases research agreements must be negotiated to ensure the sponsor and NSHE requirements are not in conflict. Before initiating the processes OSP can provide initial language to the sponsor based on NSHE requirements to help facilitate the process. Contact the [Office of Sponsored Programs](#) at 702-895-1357 or [osp@unlv.edu](mailto:osp@unlv.edu) for assistance with any research agreements.

### **Transfer of Equipment**

Requests for the transfer of research equipment to another institution must be processed through the Property Control Office in coordination with the Office of Sponsored Programs per the university's [Sponsored Program Equipment Transfer process](#). This process supplements existing internal inventory checks that each department chair or unit director has developed for faculty/researchers that leave the University.

### **Transfer of Grants/Termination of Grants**

PIs or PDs may be incoming or outgoing from UNLV and have sponsored funding they wish to continue. If incoming to UNLV, the PI or PD must notify their current institution and formally request transfer of grants or contracts. In addition, the Dean of the College and Chair of the home department must be informed of the request and provide an initial review of the impact (graduate students, sub awardees, etc.). Therefore, it should not be assumed that any institution will automatically transfer any awards for which you are the named PI either to or from UNLV.

The PI or PD must notify OSP that awards are being requested to be transferred to/from UNLV. The two institutions' sponsored programs offices will need to work together with relevant Colleges and Departments to ensure the awards are transferred according to the sponsor requirements. If a PI or PD is leaving UNLV, the same requirements must be followed, first working with OSP to ensure transfer to the next institution, pending approval by UNLV and/or the sponsor. Note that the University and the Sponsor will review transfer requests on a case by case basis and determine what is in the best interest of the University and the research.

Additionally, termination of grants or contracts may be required based on circumstances such as financial issues, change of staffing, scope of work, or cause. Sponsored agreement terms and conditions must be reviewed and followed in order to request termination of award. For guidance on this process contact the [Office of Sponsored Programs](#) at 702-895-1327 or [osp@unlv.edu](mailto:osp@unlv.edu).

## **Use of Human Subjects**

All research activities involving human subjects must be reviewed and approved by the [Institutional Review Board \(IRB\)](#) prior to initiation of the project. The IRB is responsible for safeguarding the rights and welfare of subjects who participate in research activity.

All protocol submissions must be submitted through Cayuse, which can be accessed at [Cayuse Research Suite](#). Information on submitting materials to the IRB can be found [here](#). PIs are responsible for initiating renewals for approved protocols consistent with the expiration date noted in the initial approval letter. PIs are also responsible for updating the Office of Research Integrity regarding modifications, progress, and closure for all approved and acknowledged protocols.

All researchers are required to complete [training on the protection of human subjects](#). The University's IRB requires documentation of participation in such training by all PIs conducting research involving human subjects, in accordance with the Department of Health and Human Services (DHHS) regulations.

Staff members in the Office of Research Integrity-Human Subjects may be reached via email at [irb@unlv.edu](mailto:irb@unlv.edu), or by telephone at 702-895-2794.

## **Research on Vertebrate Animals**

In accordance with federal regulations for the review of animal research protocols (Public Health Service Policy, USDA, and Animal Welfare Regulations), the University requires that all researchers who conduct research utilizing vertebrate animals must obtain written approval from the [Institutional Animal Care and Use Committee \(IACUC\)](#) prior to ordering animals and beginning work.

All protocol submissions must be submitted through [IRBNet](#). For additional questions, please contact the animal care staff at [lacs@unlv.edu](mailto:lacs@unlv.edu).

## **Data Maintenance and Ownership**

Research data from projects conducted at the University, under the auspices of the University, or with University resources is subject to UNLV policies on the ownership, maintenance, and management of data. The University has the proper resources to secure and manage research data, as well as protect associated intellectual property rights, and therefore is the appropriate administrator of such data. Consequently, the rights, responsibilities, and principles that determine how research data should be handled ultimately belong to the University. The University and researchers must work in partnership to fulfill these obligations.

## **Intellectual Property**

The Nevada System of Higher Education, on behalf of UNLV, [owns the intellectual property \(IP\) developed by UNLV personnel](#). UNLV's [Office of Economic Development \(OED\)](#) is responsible for the assessment, protection, marketing, and commercialization of IP. Additional information can be found at [Office of Economic Development Commercialization Process](#).

UNLV personnel are responsible for reporting all inventions pursuant to Policy through the completion of a [Research Disclosure Form](#). The completed forms should be submitted in a timely manner so that the University can:

(1) comply with the Sponsored Research Agreement (SRA) if the invention was supported by a sponsor; (2) take appropriate actions related to possible encumbrances of the invention by other agreements (e.g., collaboration agreements, inter-institutional agreements, license agreements, or other SRAs); and (3) work with the inventors to make a determination regarding whether to protect the IP or release it to the inventors.

OED is also responsible for other types of corporate engagements and can provide guidance to employees of UNLV in engaging with third party corporate entities, including consulting agreements, corporate sponsored research, start-up formation, board positions, and corporate executive positions.

## **Research Space Practices**

Interdisciplinary space, including, but not limited to, the Science and Engineering Building (SEB), the Harry Reid Center, Campus Laboratory Building 3 (CLB3), the Accelerator Lab Building (ALB), and the Animal Care Facility are managed by the Vice President for Research (VPR). Research faculty wishing to be assigned space in a VPR facility must complete a [Research Space Request](#) and submit it via the dean of their department. Completed requests should be emailed to [Kris Davidson](#), Executive Director of Research Infrastructure for consideration by the VPR Space Committee. Occupants of VPR facilities are expected to work with the manager of each facility to support lab infrastructure research requirements and concerns.

## **Vice President for Research Lab Space**

Research laboratory space (both wet and dry) is a high-value asset for UNLV that needs to be assessed, allocated and reallocated in a reasonable and objective manner in order to support the university strategic research objectives. Priority is given to research activities that are most productive and advance the University's mission in the most effective manner. For this reason, a Research Space Committee is established to evaluate interdisciplinary space usage, including, but not limited to, the Science and Engineering Building (SEB), Harry Reid Center (HRC), Campus Lab Building 3 (CLB-3), the Accelerator Lab Building (ALB), and the Animal Care Facility. These spaces are managed by the Vice President for Research (VPR). Other research spaces located within college buildings are considered to be managed by the dean of the respective department. Due to limited research space, the deans also manage these spaces effectively and efficiently to best serve the university's research objectives.

Space managed by the VPR is reviewed annually, or as necessary, by the VPR Space Committee. Space allocation discussions are initially focused around research expenditures, proposal activity, and student support and matriculation, and lab activity and efficiency. Other factors may be considered if an allocation warrants further consideration. Based on the Research Space Committee's recommendations, the VPR will make space decisions and share them with the appropriate dean(s) and the Office of Space Management. It is the dean's responsibility to notify affected faculty and discuss alternative research space options within their division, if required. The overall needs of the campus will take priority over the individual needs of units.

### **Committee Composition – Voting Members**

- Dean of the College of Engineering or designee
- Dean of the College of Sciences or designee
- A faculty representative from the College of Engineering who does not occupy space in these facilities
- A faculty representative from the College of Sciences who does not occupy space in these facilities
- Associate Vice President for Research or designee
- Executive Vice President and Provost/Space Management Representative
- Other deans or faculty representatives as deemed appropriate by the VPR

Non-voting members include the SEB, HRC, CLB-3, ALB, and Animal Care Facility managers. They are invited to provide background information and data for decision-making.

### **Meetings**

The Office of the VPR will schedule meetings and provide data in advance related to research metrics.

Other research spaces located within college buildings are considered to be under the control of the Dean. The Dean is expected to use these spaces effectively and efficiently due to limited research space.

### **Providing a Safe Working Environment**

An essential requirement of all University projects, whether sponsored or not, is to provide a safe working environment for all students, staff, and faculty engaged in teaching and/or research.

The PI, PD or supervisor is responsible for the day-to-day management of all research conducted under his/her supervision or in University facilities assigned to that individual.

The responsibilities of a PI, PD or supervisor include, but are not limited to:

- Ensuring the routine availability of any equipment or facilities required to conduct specific research;
- Providing any necessary safety equipment for the conduct of research under his/her

- supervision;
- Ensuring that each individual complies with the standards for safe behavior in the laboratory;
  - Ensuring all personal protective equipment and safety equipment is in good working condition, including routine (at least monthly) activation of eyewashes and safety showers; and
  - Ensuring that each individual has completed appropriate safety training for the hazards present in the laboratory and the specific type of work being performed to comply with all applicable federal, state, and University regulations.

Strict compliance with all safety standards outlined by Risk Management and Safety is required. These standards are supplemented by any additional safety precautions adopted by the University, the researcher's college, department, or organized research unit (ORU).

Laboratory safety information is available at laboratory biosafety and chemical hygiene. Information on the use of radioactive materials and radiation-producing equipment can be found at radiological safety. Safety training offerings are listed here.

Questions regarding safe practices in the lab, safety issues, or safety training should be directed to [Julie Bertoia](#), Laboratory Safety Manager.

## **Controlled Substances**

Compliance with the regulations for the use of controlled substances in research is required by all researchers.

The Office of Clinical Trials is working closely with the Cannabis Policy Institute to maintain a centralizing operation of cannabis clinical research including, policies and procedures, FDA submissions, management of DEA approvals, and works closely with UNLV's Investigational Drug Services for all investigator-initiated cannabis clinical trials. Please contact [cto@unlv.edu](mailto:cto@unlv.edu) for further information.

The Drug Enforcement Agency (DEA) regulates the use and possession of DEA-controlled substances, such as pentobarbital and cannabis. Please note that many chemicals that were not controlled substances in the past are now controlled by the DEA. A federal DEA license and a state license are required for these substances. Many substances also require an FDA license to conduct research.

View the list of DEA controlled substances [here](#).

If you have any controlled substances and you do not have a license for that particular controlled substance, contact [Risk Management and Safety](#) (RMS). RMS will arrange for legal disposal or assist you in obtaining the proper licenses.

## **Select Agents**



Compliance with the [regulations for the use of select agents](#) (certain biological agents and toxins) is required in research. All research utilizing select agents is controlled by the Centers for Disease Control and/or the United States Department of Agriculture (USDA).

If you wish to work with or locate one of these agents, [contact Risk Management and Safety for assistance](#).

### **Institutional Biosafety Committee**

Researchers conducting either sponsored or non-sponsored research with recombinant DNA, infectious agents, toxins, primary human cell lines, human stem cells, human blood, or human tissue must have their research approved in advance by the Institutional Biosafety Committee (IBC). Approvals are valid for three years. It is the responsibility of the PI or PD to obtain renewals from the IBC after the initial three-year approval. All protocol submissions must be submitted through [IRBNet](#). Information on submitting materials to the IBC can be found [here](#).

Contact [Kevin Bergeron](#), Manager, Biological Research Programs for questions regarding the Institutional Biosafety Committee.

### **Visiting Scientists/Scholars**

PIs, PDs and supervisors are required to complete a [Volunteer Agreement Form](#) with any visiting scientist or scholar working under his/her guidance (but who is serving in this capacity without University support or employment). PIs and PDs who are coordinating Visiting Scientists/Scholars who are foreign nationals must also contact the Export Control Office for further assistance.

### **Public Lands Permits**

PIs and PDs conducting research or class-based field trips on public lands must obtain and carry a permit. The Division of Research assists with obtaining these permits from the federal agency where the activity is to occur. [Request assistance with permitting](#).

Contact [Kevin Bergeron](#), Manager, Biological Research Programs with questions regarding public lands permits.

### **Clearance of Faculty/Researcher Terminating Employment**

The Office of Human Resources coordinates processes for clearing faculty who terminate their employment with the University. The clearance process enables faculty to exit the University in good standing by appropriately verifying clearances, as applicable, with the Risk Management and Safety Office, Office of Sponsored Programs, and the Office of Research Integrity.