

**NOVA SOUTHEASTERN UNIVERSITY
OFFICE OF SPONSORED PROGRAMS
POLICIES AND PROCEDURES**

**COMPLIANCE/AWARD ACCEPTANCE
REQUESTS FOR INFORMATION
EFFECTIVE 12-01-08, REVISED 12-26-2014
POLICY #20
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PURPOSE:

To establish a policy and procedure to assist university personnel in responding to requests for information regarding a sponsored project or program.

DEFINITIONS:

None

POLICY:

All requests for information related to sponsored awards at the university must be reviewed by the Office of Sponsored Programs (OSP) and Legal Counsel to determine whether information may be legally disclosed according to the procedures below. This policy pertains to requests for information regarding sponsored awards and programs.

REFERENCES:

- Freedom of Information Act, as amended (5 U.S.C. §552).
- Florida Statutes Chapter 119
- OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR Part 200, <https://federalregister.gov/a/2013-30465>
- OMB Federal Awarding Agency Regulatory Implementation of Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, <https://www.federalregister.gov/articles/2014/12/19/2014-28697/federal-awarding-agency-regulatory-implementation-of-office-of-management-and-budgets-uniform>

PROCEDURES:

Upon receiving a public request for information related to a sponsored award, such request will be referred to the OSP and Legal Counsel. A determination must first be made regarding the legal status of the request, as well as identification of the applicable laws and regulations, determination of what can be released, acquisition of any permissions or consents regarding release of the information, and determination of what must be protected from release.

1. Upon receiving a request for information, the OSP will provide the requesting individual a *Public Request for Access to Information* form for completion as applicable, which includes the requestor's contact information (name, address, phone, etc.), the time and date the request was submitted, what

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information is requested, and how this information will be used. This form will be completed and signed by the requestor.

2. The OSP will forward the completed form to Legal Counsel for review.
3. If Legal Counsel determines the information can be provided, Legal Counsel will approve and return the form to the OSP. OSP will provide the information to the requestor and maintain the form and legal determination in the official award file.
4. If Legal Counsel determines the information cannot be provided, Legal Counsel will provide a written explanation for the disapproval of the request, and return this along with the form reflecting the denial to OSP. OSP will inform the requestor of the decision and maintain the form and the legal determination, along with all other related documentation in the official award file.
5. If Legal Counsel determines that certain information can be provided while other information cannot be provided, Legal Counsel will react as appropriate, insert an explanation for the request, and return the form to OSP. OSP will retain the records of this decision in the official award files.