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1. Overview

Purpose

The purpose of this procedure is to define and outline Drexel University's Office of Research and Innovation's (ORI) response to allegations or concerns related to harassment, bullying, retaliation, hostile working conditions, or other unsafe environments. This includes the responsibilities of the Authorized Organization Representative (AOR) and Institutional Official (IO).

Drexel University is committed to providing a work and learning environment free of harassment, exploitation, or intimidation. These procedures are intended to be conducted in coordination and in addition to the University policies, procedures, and guidance, including but not limited to those in Section 3: Applicable University Policies. Drexel University seeks to foster an inclusive and healthy educational and work environment based on trust and respect. The University prohibits harassment, discrimination, retaliation, and bias incidents in any form, including, but not limited to, those based upon race, color, ethnicity, national origin, religion, gender, gender identity or expression, sex, sexual orientation, disability, age, status as a veteran, socioeconomic status, and/or any characteristic prohibited by law (i.e., creed, marital status, citizenship status, etc.).

Drexel University's Office of Research & Innovation's (ORI) is committed to complying with all reporting requirements regarding harassment for research, educational activities, and other sponsored programs, as applicable. This commitment includes, but is not limited to, those defined by Drexel University, the National Science Foundation (NSF), the National Institutes of Health (NIH), and other federal and state requirements.

To ensure a respectful and inclusive environment in all research, educational activities, and sponsored programs, regardless of funding, the following steps are taken to prevent and report accordingly. Please note, the below are not intended to limit Drexel University's institutional policies, procedures, or standards.

2. Prevention

2.1 Promote a Culture of Respect and Inclusion (Training)

To prevent harassment and create a respectful workplace, we provide mandatory harassment prevention training as follows:

a) Employees and Faculty:
   i. "Understanding Title IX, at Drexel University," along with "Drexel University Code of Conduct," within 90 days of hire and at regular intervals.
   ii. Harassment, Discrimination, and Bias Training at regular intervals
b) Students:
   i. Graduate level: "Title IX at Drexel University and Drexel U Got This! Graduate Student Training" and "Student Code of Conduct" annually.
   ii. Undergraduate level: Title IX incorporated into orientation and "Student Code of Conduct" at regular intervals.
   iii. All students: Harassment, Discrimination and Bias Training at regular intervals

c)   All individuals involved in research, educational activities, and other sponsored programs: Individuals who engage in the conduct of human subject research or animal research or otherwise required to take Responsible Conduct of Research training are required to take certain relevant modules in the CITI Program, including, but not limited to; Mentoring and Healthy Research Environments, Personnel and Their Welfare, Reporting Requirements (General), and Financial Responsibility (Sponsor Requirements).

2.2   Policies and Procedures

In addition to Drexel University's extensive institutional policies and procedures, ORI has developed these procedures to promote education and compliance with all reporting requirements regarding harassment for research, educational activities, and other sponsored programs, as applicable. These procedures will be reviewed and revised to align with requirements and regulations consistent with Drexel University's ORI established revision cycle for SOPs.

3. Applicable University Policies

Various University policies and guidance address sexual harassment, harassment, sexual assault, discrimination, and other types of misconduct, and define local response procedures. In addition to adhering to the requirements in sponsored awards, Drexel University requires adherence to the policies and procedures listed in Section 3.1.

3.1   Drexel Compliance/Reporting Policies

Policy (Link)	Supporting Office
CR-1: Discrimination, Harassment, Bias Incident Prevention Policy	Institutional Equity and Inclusive Culture (EIC)
CR-2: Sexual Harassment and Sexual Misconduct Policy	Institutional Equity and Inclusive Culture (EIC)
CPS-1: Code of Conduct	Office of Compliance, Policy and Privacy Services
CPS-4: Reporting Allegations Policy	Office of Compliance, Policy and Privacy Services
HR-16: Workplace Anti-Violence	Human Resources
Conduct of Research Policy	Office of the Provost

4. Reporting

4.1   Report of an Incident

As outlined in Drexel University's Institutional policies and procedures, there are several mechanisms individuals can use to report, including but not limited to:

a)   **EthicsPoint (anonymously):** https://secure.ethicspoint.com/domain/media/en/gui/14030/index.html

b) **EIC Incident Reporting:** https://cm.maxient.com/reportingform.php?DrexelUniv&layout_id=6
c) **Email:** EIC@drexel.edu

In addition, all Drexel University faculty, administration, and professional staff are mandatory reporters and must report any incident of, but not limited to, discrimination, harassment, bias, intimate partner violence, stalking, sexual assault, sexual violence, rape or other forcible sexual offense against any member of the University community upon learning of the incident. These reports are made to Drexel University's EIC Office through the reporting options linked above.

4.2   **ORI Report Management**

Once a report has been made, Drexel University's EIC Office and Institutional Compliance Office thoroughly and impartially investigate in accordance with institutional policies and procedures. These offices work collaboratively and quickly with relevant University administrators, including the Office of Research & Innovation, in a confidential and private manner prior to any findings or actions to initiate the steps below that may run concurrently with other institutional investigative processes, as applicable.

Any incident, allegation, or behavior that may meet the criteria of prohibited conduct, as defined by the associated agency will be reported through Drexel University's appropriate reporting mechanism (e.g., EthicsPoint, incident form, email), either by the complainant, mandatory reporter, or other.

- At the outset of a University investigation into allegations of harassment of any sort or any unwelcome sexual conduct, the EIC Office and/or Human Resources (HR) will inquire whether the individual conducts research that would be pursuant to mandatory reporting. If the individual conducts research that would be pursuant to mandatory reporting, the Authorized Organizational Representative (AOR) will be confidentially notified by the Title IX Officer or representative, the EIC Office, or HR of the identity of the individual whose conduct is under review (the "respondent").
- The AOR and/or designees will confidentially identify the research role(s) of the respondent and whether there are additional reporting requirements based on research funding sources, e.g., if the respondent is a PI or a co-PI on any current NSF award(s), including subaward(s).
- If the respondent is a PI, co-PI, or other key research personnel on any federally funded research projects, the applicable funders will be notified of any allegations, findings, changes in status, or disciplinary actions per the terms and conditions of the award(s) and in accordance with the reporting table in Section 4.3.
- If interim measures imposed by the University, e.g., administrative leave of the respondent, could negatively affect the research activities or other personnel associated with the award, the University, through the Institutional Official or designee, may seek to appoint a substitute PI or co-PI in consultation with funding source. This process will necessarily involve discussions with others at the University, including the potential substitute PI(s) or co-PI(s) and appropriate Department Chair(s) or Dean(s), but disclosures will be limited to the extent possible.
- After a final determination of responsibility, and if a substitute PI or co-PI has not already been approved, the University, through the Institutional Official or designee, may again seek to appoint a substitute PI or co-PI, as applicable. This process will necessarily involve discussions with others at the University, including the potential substitute PI(s) or co-PI(s) and appropriate Department Chair(s) and Dean(s), but disclosures will be limited to the extent possible.
- Notifications to funding agencies under this procedure regarding both interim administrative actions and final determinations of responsibility will identify the respondent, as required, but will not include

personally identifiable information of others (e.g., the complainant(s) or witnesses).

- When Drexel is a sub awardee or non-lead institution, notifications will be made directly to the applicable funding agency, as required. However, the University may also communicate with the prime awardee as necessary or appropriate under the circumstances.

4.3 Identify the Current Status and Applicable Awards, Projects, Activities, and Programs

ORI starts by assessing the status of the investigation and takes an inventory of the impacted awards, projects, activities, and programs to ensure all expectation and requirements are identified, including relevant definitions and timelines to address any reporting requirements promptly. Please see the Reporting Table below.

Reporting Table as of 10/27/2023:

Agency	Most Recent Effective Date	Reporting Requirement	Timing	Link
NIH	06/2020 & 07/2022	NIH must be notified 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. See link for additional details. This includes a change in status.	Within 30 days of the removal or disciplinary action; The request for prior approval must be submitted promptly, and NIH must be proactively notified of any change of status of the PI or senior key person.	Policy Link
NSF	10/22/2018	Any findings/determinations of sexual harassment, other forms of harassment, or sexual assault regarding an NSF funded Principal Investigator (PI) or co-PI, or of the placement of the PI or co-PI on administrative leave, or the imposition of any administrative action relating to harassment or sexual assault finding or investigation.	Within ten business days from the date of the finding/determination, or the date of the placement of a PI or co-PI by the awardee on administrative leave or the imposition of an administrative action, whichever is sooner.	Policy Link

NASA	04/09/2020	Any findings/determinations of sexual harassment, other forms of harassment, or sexual assault regarding a NASA funded PI or Co-I; if the PI or Co-I is placed on administrative leave or if the recipient has imposed any administrative action on the PI or Co-I, or any determination or an investigation of an alleged violation of the recipient's policies or codes of conduct, statutes, regulations, or executive orders relating to sexual harassment, other forms of harassment, or sexual assault.	Within ten business days from the date of the finding/determination, or the date of the placement of a PI or Co-I by the recipient on administrative leave or the imposition of an administrative action.	Policy Link
Other Funder/Sponsors	*REFER TO TERMS, CONDITIONS, AND MOST RECENT REQUIREMENTS AND REGULATORY UPDATES*			

4.4 Notify Relevant Stakeholders (Internally)

As the investigation proceeds, Senior ORI leadership will provide information to applicable offices (e.g., HRPP-IRB, IACUC, IBC) as required while maintaining confidentiality to the impacted parties as much as possible to ensure appropriate safeguards for human research participants, animals, and others. This notification could involve ad-hoc IRB, IBC, or other meetings and actions as necessary to ensure all obligations are appropriately managed.

4.5 Notify Relevant Stakeholders (Externally)

Once an action or finding has been made that meets the requirements of the "Reporting Table," Senior ORI Leadership, or appropriate delegates will complete all initial and follow-up reporting requirements. This may include requesting a new PI or study personnel or working with sponsors to identify appropriate plans to stop or close research, educational activities, or other sponsored programs. ORI commits to working closely with Program Officers, Sponsors, Departments, and Personnel to identify the most appropriate solution for ongoing research, educational activities, and other sponsored programs.

As a reminder, the IO, AOR, IRB, or IACUC Chair, and others may take additional actions on behalf of the University or research as required by the regulations and requirements of each impacted area (e.g., IRB, IACUC, IBC) per their specific policies, procedures, and guidance depending upon the specifics of the investigation or affected areas. Examples include the transition of human subjects or animals on an ongoing study or notification of subjects that a study has been suspended.

4.6 Update Relevant Stakeholders

After the initial notification, ORI will ensure that the applicable stakeholders continue to be updated and support research, educational activities, and other sponsored programs until the final resolution of the event.

5. Federal Sponsor Specific Requirements

5.1 National Science Foundation (NSF)

On September 21, 2018, the National Science Foundation (NSF) published in the Federal Register a

final notice of a new award "term and condition regarding sexual harassment, other forms of harassment, and sexual assault." That term and condition requires the University to notify NSF promptly with findings of "sexual harassment, other forms of harassment, or sexual assault" against an NSF-funded principal investigator (PI) or co-PI, as well as interim administrative actions imposed by the University (e.g., administrative leave or curtailment of certain University duties).

The term and condition are effective as of October 22, 2018. All NSF awards and funding amendments to existing awards are subject to the notification requirement.

If the respondent is a PI or a co-PI on any NSF award(s), including sub-award(s), NSF will be notified within ten (10) business days of such final determination of responsibility, in accordance with NSF requirements.

5.1.1 NSF-Sponsored Conferences

Per NSF's Proposal and Award Policies and Procedures Guide (PAPPG), effective January 28, 2019, NSF is adopting a requirement that conference proposers have a policy or code-of-conduct that addresses sexual harassment, other forms of harassment, and sexual assault, and that includes clear and accessible means of reporting violations of the policy or code-of-conduct. This policy or code-of-conduct must be disseminated to conference participants prior to attendance at the conference and made available at the conference itself.

Please also note, that NSF will not fund travel to conferences that do not have a policy or code-of-conduct that addresses sexual harassment, other forms of harassment, and sexual assault.

5.1.2 NSF Safe and Inclusive Working Environments for Off-Campus or Off-Site Research

Per NSF's Proposal and Award Policies and Procedures Guide (PAPPG), effective January 30, 2020, NSF requires proposals with research activities conducted off-campus or at an off-site location to have a plan in place describing how the following types of behavior will be addressed:

- Abuse of any person, including, but not limited to, harassment, stalking, bullying, or hazing of any kind, whether the behavior is carried out verbally, physically, electronically, or in written form; or
- Conduct that is unwelcome, offensive, indecent, obscene, or disorderly.

Some things to consider when creating an off-campus research safety plan include:

- **Cultural norms**
  The location where the research will take place may have different cultural norms

- **Terrain and challenges**
  The research site may have terrain, temperature, visual, auditory, or other challenges

- **Physical circumstances**
  In remote locations, physical circumstances may limit a participant's ability to separate from someone who has violated the Safe and Inclusive Working Environment plan

In addition, some NSF directorates, like Biological Sciences (BIO) and Geosciences (GEO), require a 2-page supplemental document to be submitted with the proposal. However, for many solicitations, the completed plan is not submitted to the NSF. In these cases, the PI should prepare and save the plan internally.

The four components of the Safe and Inclusive Fieldwork (SAIF) plan are specified in each solicitation (please read them in their entirety), and include:

1. a description of the field setting and unique challenges for the team;
2. steps that will be taken to nurture an inclusive off-campus or off-site working environment;
3. communication processes; and
4. organizational mechanisms for reporting, responding to, and resolving issues of harassment, should they arise.

As part of a comprehensive safe and inclusive working environment plan, elements may include, but are not limited to applicable trainings, processes, responsibilities, etc. to promote an inclusive off-campus working environment, team and organizational communications, and the process for submitting and handling incident reports. The principal investigator (PI) must distribute the plan to each individual participant before they participate in the off-campus or off-site research. The PI should be available to listen to participants' concerns before they leave and should check with participants regularly to address any issues they may be experiencing.

Please note, that NSF defines off-campus or off-site research as data/information/samples being collected off-campus or off-site, such as fieldwork and research activities on vessels and aircraft.

5.2 National Institutes of Health (NIH)

The NIH requires that recipients of NIH funding comply with applicable federal civil rights laws and regulations, as outlined in the NIH Grants Policy Statement (NIH GPS), as a term and condition of award. NIH also expects awardee organizations to:

- develop and implement policies and practices that foster a harassment-free environment;
- maintain clear, unambiguous professional codes of conduct;
- ensure staff are fully aware and regularly reminded of applicable laws, regulations, policies, and codes of conduct;
- provide an accessible, effective, and easy process to report sexual harassment, and provide protection from retaliation;
- respond promptly to allegations to ensure the immediate safety for all involved, investigate the allegations, and take appropriate sanctions; and
- inform NIH when senior/key personnel on NIH awards are removed from their position or are otherwise disciplined by the recipient institution due to concerns about harassment, bullying, retaliation or hostile working conditions.

5.2.1 NIH Training Awards

In addition to the expectations above, the NIH has established parameters relating to harassment that are specific to institutional training (T) grants (T15, T32, T34, T35, T36, T37, T90/R90, TL1, TL4). Applications submitted on or after January 25, 2019 must now include a signed letter on

institutional letterhead from a President, Provost, Dean, Department Chair, or other key institutional leader that describes institutional commitment to the following areas:

(i) ensuring that proper policies, procedures, and oversight are in place to prevent discriminatory harassment and other discriminatory practices;

(ii) responding appropriately to allegations of discriminatory practices, including any required notifications to OCR (see NOT-OD-15-152); and

(iii) adopting and following institutional procedure for requesting NIH prior approval of a change in the status of the Program Director/Principal Investigator (PD/PI) or other senior/key personnel if administrative or disciplinary action is taken that impacts the ability of the PD/PI or other key personnel to continue his/her role on the NIH award described in the training grant application (also see NOT-OD-18-172 policy on change in PD/PI status).

This letter is to ensure that proper policies, procedures, and oversight are in place to prevent discriminatory harassment and other discriminatory practices will be in addition to the content that is currently included in the Letters of Support describing the applicant institution's commitment to the planned program in order to ensure its success (e.g., providing facilities and a research environment conducive to preparing trainees for successful careers as biomedical research scientists; providing appropriate inter- or multidisciplinary research training opportunities and courses which will allow trainees to acquire state-of-the-art scientific knowledge). A link to this letter can be found in Section 7: Resources.

5.2.2 NIH Support for Conferences and Scientific Meetings

Effective April 12, 2022 applicants for NIH Support for Conferences and Scientific Meetings (R13/U13) must include plans to promote diversity and safe environments as part of Just-In-Time materials should the application be recommended for funding. It is expected that organizers of NIH-supported conferences and scientific meetings take steps to maintain a safe and respectful environment for all attendees by providing an environment free from all forms of discrimination and harassment, sexual or otherwise and employ strategies that seek to prevent or mitigate the effects of discrimination and harassment, sexual and otherwise. Below are examples of strategies that could be employed to support a safe environment (conference organizers should consider additional strategies as appropriate):

- Establishing a conference code of conduct with clearly stated expectations of behavior, systems of reporting, and procedures for addressing inappropriate behavior. The code of conduct and reporting mechanisms should be clear and accessible to all meeting attendees.
- Providing resources to support individuals who report incidents of harassment, including:
  - personnel trained in advocacy and counseling
  - referrals to legal or health care resources
  - procedures for ensuring the safety of all conference attendees, up to and including removing a perpetrator from the conference
- Conducting conference climate surveys specifically related to sexual harassment and professional misconduct

5.3   National Aeronautics and Space Administration (NASA)

On March 10, 2020, NASA published its Final Notice of Reporting Requirements Regarding Findings of Harassment, Sexual Harassment, Other Forms of Harassment, or Sexual Assault. Per the notice, NASA award terms and conditions require recipient organizations to report to NASA any findings/determinations of sexual harassment, other forms of harassment, or sexual assault regarding a NASA-funded PI or Co-I. The terms and conditions also require the recipient to report to NASA if the PI or Co-I is placed on administrative leave or if the recipient has imposed any administrative action on the PI or Co-I, or any determination or an investigation of an alleged violation of the recipient's policies or codes of conduct, statutes, regulations, or executive orders relating to sexual harassment, other forms of harassment, or sexual assault. The terms and conditions specify the reporting procedures and requirements and the steps that will be followed by NASA upon receipt of a report.

6. Responsibilities

6.1   Drexel University's Responsibilities

Drexel University's collective responsibility is to uphold our organization's highest standards of ethics, integrity, and respect, especially when conducting research, educational activities, or other sponsored programs.

6.2   Office for Research & Innovation Responsibilities

The Office for Research & Innovation is responsible for maintaining these procedures, applicable tools, training, liaising with other relevant offices, and monitoring. ORI may also engage in investigations, audits, or other reviews as appropriate. For inquiries regarding these procedures, please contact the Associate Vice Provost for Research Compliance and Regulatory Affairs, as part of the Office for Research & Innovation (ORI).

6.3   PI and Co-PI Responsibilities

The Principal Investigator maintains overall responsibility of a project, including adhering to Drexel University's standards and policies, regulatory requirements, and award terms and conditions. This includes distribution and adherence to any Safety Plan, Letter of Support, or other requirements as agreed or committed to with the funder or sponsor of the project.

The Principal Investigator (PI) and any co-PI(s) identified on an applicable federal award are in a position of trust and are required to comport themselves in a responsible and accountable manner during the award period of performance, whether at the awardee institution, online, or at locales such as field sites, facilities, or conferences/workshops.

6.4   Authorized Organizational Representative Responsibilities

The AOR or designee is responsible for notifying funding agencies and submitting all required information related to findings or determinations of harassment per the terms and conditions of the award(s).

7. Resources

- CR-1: Discrimination, Harassment, Bias Incident Prevention Policy
- CR-2 Sexual Harassment and Sexual Misconduct Policy
- NIH Anti-Sexual Harassment Statement

DREXEL UNIVERSITY
Office of
Research &
Innovation

Addressing Harassment and Discrimination in Research – Standard Operating Procedures			
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- [NIH Support for Conferences and Scientific Meetings](#)
- [NSF Notification Requirements Regarding Findings of Sexual Harassment, Other Forms of Harassment, or Sexual Assault](#)
- [NSF Proposal and Award Policies and Procedures Guide (PAPPG)](#)
- [NASA Reporting Requirements Regarding Findings of Harassment, Sexual Harassment, Other Forms of Harassment, or Sexual Assault](#)
- [Conference Safety Plan Template](#)
- [Institutional Letter for NIH Training Grants](#)

8. Revision and Advisory Board Members

8.1 Revision

- Version 001/Effective Date 12/2/2024 - Original Document

- Version 001/Effective Date 2/11/2025
  - Minor revision to update the EIC policies and policy links

8.2 Advisory Board Members

The Office for Research and Innovation appreciates the following individuals who served as Advisory Board Members:

Advisory Board Members	
Leslie Ashburn-Nardo, PhD Vice Provost for Diversity, Equity and Inclusion Office of the Provost	**Kimberly Gholston, CDE®** Vice President and Chief Diversity Officer Office for Institutional Equity and Inclusive Culture
Marisa Corbett, BA, CCRC Executive Director for Research Quality Assurance Office of Research & Innovation	**Carissa Miller** Research Compliance Coordinator Office of Research & Innovation
Alison Dougherty, Ed.D. Assistant Vice President, Title IX & EO Coordinator Office for Institutional Equity & Inclusive Culture	**Cassandra Myers, BS** Associate Vice Provost for Research Compliance & Regulatory Affairs Office of Research & Innovation
Jennifer Gallagher Executive Director, People Operations & Talent Management Human Resources	**Jacqueline Stults, MBA, BSW** IRB/IACUC Administrator Office of Research & Innovation