

Brown University (“Brown” or “University”) is committed to creating and maintaining an educational, research, working, and living environment free from all forms of unlawful harassment and sexual misconduct. The University has created [policies and procedures](#) that describe the community standards of conduct as well as the procedures for grievances and complaints alleging violations of its discrimination and harassment policies.

In addition to University policy, Federal and State sponsors of Brown’s research have notification and reporting requirements related to sexual harassment, harassment, sexual assault, and discrimination. Many of these sponsors have recently issued rules and guidance regarding these requirements and the importance of adhering to them.

## **Federal Agency Specific Guidance**

### **National Science Foundation (NSF)**

#### **NSF Requirements**

On September 21, 2018, 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 of findings or determinations of “sexual harassment, other forms of harassment, or sexual assault” concerning an NSF-funded principal investigator (PI) or Co-PI, as well as of any interim administrative actions imposed by the University (*e.g.*, administrative leave or curtailment of certain University duties) relating to any finding, determination, or investigation of an alleged violation by a PI or Co-PI of the University’s policies relating to harassment and assault.

The term and condition is effective for NSF awards and amendments made on or after October 22, 2018.

Brown has established procedures that comply with these requirements. Please contact OSP with questions or for more information.

#### **NSF-Sponsored Conferences**

NSF’s [Proposal and Award Policies and Procedures Guide \(PAPPG\) \(effective February 25, 2019\)](#) sets forth 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.” Notably, “[t]his policy or code-of-conduct must be disseminated to conference participants prior to attendance at the conference and made available at the conference itself.”

For more information on applicable Brown policies and how Brown can assist researchers with complying with NSF conference requirements, please contact OSP.

## **NSF Agency Information**

[NSF Notification Requirements Regarding Findings of Sexual Harassment, Other Forms of Harassment or Sexual Assault - Final Notice \(Sept. 21, 2018\)](#)

[Important Notice No. 144: Harassment \(Feb. 8, 2018\)](#)

[NSF, Office of the Director, Sexual Harassment](#)

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

## **National Institutes of Health (NIH)**

### **NIH Requirements**

NIH requires that grantees have “policies and practices in place that foster a harassment-free environment.” With respect to this rule, NIH has stated the following:

“NIH expects that grantee institutions:

- develop and implement policies and practices that foster a harassment-free environment;
- maintain clear, unambiguous professional codes of conduct;
- ensure employees 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 of administrative actions that removes senior/key personnel on an NIH award.”

Brown has established policies and procedures that meet and provide mechanisms for researchers to comply with these expectations. Please contact OSP for more information.

### **NIH Training Grant Applications**

In addition to these expectations, NIH has established parameters relating to harassment that are specific to certain types of grants. For Institutional Training (T) Applications (T15, T32, T34, T35, T36, T37, T90/R90, TL1, TL4), NIH [requires](#) as follows:

“As part of the Letters of Support on the PHS 398 Research Training Program Plan form, applications currently include a description of the applicant institution’s commitment to the planned program in order to ensure its success . . . . In the same letter, applicants should include a description of the 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 . . . ; 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 . . . .

The signed letter should be on institutional letterhead from a President, Provost, Dean, or other key institutional leader with institution-wide responsibilities.”

Brown has made the required institutional commitments. Please contact OSP or Biomed Research Administration (BMRA) for more information or for assistance with or questions regarding Letters of Support.

### **NIH Conference Grants (R13)**

NIH requires that “NIH recipients of conference grant (‘R13’) funding must take steps to maintain a safe and respectful environment for all attendees by demonstrating an institutional commitment to ensuring that proper policies, procedures, and oversight are in place to prevent discriminatory harassment and other discriminatory practices.”

Brown has made the required institutional commitments. Please contact OSP or BMRA with questions about this requirement or assistance with conference grants.

### **NIH Agency Information**

[All About Grants Podcast on NIH Anti Sexual Harassment Policies Dr. Jodi Black \(August 8, 2019\)](#)

[How to Notify NIH about a Concern that Sexual Harassment is Affecting an NIH-Funded Activity at a Grantee Institution](#) (June 14, 2019)

[Update on NIH’s efforts to address sexual harassment in science](#) (Feb. 28, 2019)

[NIH Director's statement on changing the culture of science to end sexual harassment](#) (Sept. 17, 2018)

[NIH Anti-Sexual Harassment Statement](#), including links to regulations, policy, and FAQs  
[Anti-Sexual Harassment: for NIH Awardee Organizations and Those Who Work There](#)

## **National Aeronautics and Space Administration (NASA)**

In January 2016, NASA Administrator Charles Bolden published a [letter](#) to grantee institutions running NASA-funded programs regarding harassment policies, which stated as follows:

*“As a leader in the fields of science, technology, engineering and mathematics (STEM), NASA endeavors to make our collaborations with our grant recipient institutions as productive and successful as possible in all facets of our shared objectives. This means that we seek not only the most innovative and cutting-edge scientific and technological research from our grant recipients, we also expect strong efforts to create and sustain welcoming and inclusive educational environments. We view such efforts not as “something nice to do” if the time can be spared, or something that human resources or the diversity and equity offices are responsible for, but rather as an integral and indeed necessary aspect of all educational program environments.*

*Let me be perfectly clear: NASA does not tolerate sexual harassment, and nor should any organization seriously committed to workplace equality, diversity and inclusion. Science is for everyone and any behavior that demeans or discourages people from fully participating is unacceptable.”*

### **NASA Proposed Requirements**

Following on this commitment, NASA published a notice in the July 10, 2019 [Federal Register](#) entitled “Reporting Requirements Regarding Findings of Harassment, Sexual Harassment, Other Forms of Harassment, or Sexual Assault,” seeking public comment on a proposed rule that would institute a new term and condition in NASA awards requiring reporting of sexual harassment, other forms of harassment, and sexual assault.

The Notice explained NASA’s policy objective as follows: “The implementation of new reporting requirements is necessary as NASA seeks to help ensure research environments to which the Agency provides funding are free from sexual harassment, other forms of harassment, and sexual assault.”

Similar to NSF, the new term and condition would require NASA-funding recipients to report (1) findings and determinations regarding the PI or Co-PI that demonstrate a violation of the recipient’s policies or codes relating to harassment and assault and/or (2) administrative action relating to any finding, determination, or investigation of an alleged violation by a PI or Co-PI of the recipient’s policies relating to harassment and assault.

Comments in response to the Notice were due no later than August 16, 2019, and the new requirements will likely become effective in the fall of 2019. OSP and OIED will provide updates as they become available.

## **NASA Agency Information**

[NASA Administrator communicates harassment policies to grantees](#) (Jan 15, 2016)

[Compliance Requirements for NASA Grantees](#)

[NASA Office of Diversity and Equal Opportunity\\_Mission STEM](#)

[Harassment and Discrimination Reporting for NASA Employees, Contractors and Grantee Beneficiaries](#)

## **Brown University Policies and Information Regarding Sexual Harassment, Discrimination, and Assault**

The below resources contain information on University policies and guidance regarding sexual harassment, discrimination, and assault. This information will assist researchers in complying with agency-specific requirements and regulations. In addition to adhering to the requirements in sponsored awards, all members of the University community must review, understand, and comply with these policies and procedures.

[Code of Conduct](#) (applies to corporation members, faculty, undergraduates, graduate and medical students, staff, volunteers and visiting scholars)

[Code of Student Conduct](#) (applies to undergraduates, graduate, medical, school of professional studies students)

[Sexual and Gender-Based Harassment, Sexual Violence, Relationship and Interpersonal Violence and Stalking Policy](#)

[Discrimination and Harassment Policy](#)

[Gender Inequity and Sexual Assault](#)

[Incident Reporting](#)

## **Questions, Comments, Assistance**

If you have any questions about the information contained in this statement or your responsibilities with respect to University or federal agency requirements, or if you would like assistance with your NIH, NSF, NASA, or other federally funded grants, please contact the following offices:

- For questions or comments regarding federal agency rules and regulations and for assistance with federally sponsored grants and projects:

[Office of Sponsored Projects \(OSP\)](#)

Phone: (401) 863-2777

E-Mail: [Resadmin@brown.edu](mailto:Resadmin@brown.edu)

[BioMed Research Administration](#)

Phone: (401) 863 -1631

- For questions or comments regarding Brown's anti-harassment policies and harassment reporting and disclosure requirements:

[Office of Institutional Equity & Diversity \(OIED\)](#)

Phone: (401) 863-2216

E-Mail: [Instituional\\_Diversity@brown.edu](mailto:Instituional_Diversity@brown.edu)

Owner: Office of Sponsored Projects

Date: 9/5/19