

**JACKSONVILLE STATE UNIVERSITY**  
**Manual of Policies and Procedures**

**POLICY NUMBER: I:01:16**

**DATE: September 2012**

**REVISION/REVIEW DATES: 01/2019, 09/2012, February 2023**

**SUBJECT: Confidentiality Policy for JSU Sponsored Projects**

**APPROVED: Dr. Don C. Killingsworth, Jr., President**

**PURPOSE**

During the life cycle of a grant proposal, employees generate and/or are exposed to proprietary and confidential information. It is vitally important the Office of Sponsored Programs (OSP) staff, Principal Investigators (PIs)/Project Directors (PDs), the Grants Accountant (GA), and any JSU employee assigned to a grant, or any JSU employee aware of information about a grant, treat proprietary and confidential information properly. This policy protects both the sensitive information being processed and those who are handling the information.

**POLICY**

Grant proposals or contracts may contain sensitive information, including both personal and scientific materials that the PI/PD may not wish to have distributed publicly. Nevertheless, federally funded awards are a matter of public record and must be made available, as stipulated by governmental regulations, for audit and review. Most private sponsors also have audit and review requirements as conditions for acceptance of their funding. Any questions about inclusion of proprietary or other confidential information should be referred to the OSP.

The OSP will serve as the office of record for the grant proposal process and modified proposal copies. If the PI/PD has a requirement to post parts of the proposal to a project website, then a modified copy of the funded proposal will be provided by the OSP to the requestor. This copy must not contain any sensitive or proprietary information.

Sensitive or proprietary data, including but not limited to the following, shall be removed from documents that are to be made available for public record by the OSP:

- Proposal outline and other proposal documentation
- Student pay records and contracts
- Student data that falls under FERPA or other regulations
- Faculty and staff pay rates, work plans, and contracts
- Grant budget information containing pay data
- Ideas and implementation plans for proposals
- Partnerships which include status of the partnerships and roles each institution will play
- Information subject to General Data Protection Regulation (GDPR) regulation

### **RESPONSIBILITY**

The Senior Director of Sponsored Programs is responsible for this policy.

### **EVALUATION**

This policy will be reviewed every five (5) years.