

JACKSONVILLE STATE UNIVERSITY
Manual of Policies and Procedures

POLICY NUMBER: I:01:16

DATE: September 2012

REVISION/REVIEW DATES: January 2019, February 2023, June 2026

SUBJECT: Confidentiality Policy for JSU Sponsored Programs

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

POLICY

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 Grant Accountant (GA), and any Jacksonville State University (JSU) employee assigned to a grant, or any JSU employee aware of information about a sponsored program, treat proprietary and confidential information properly.

PIs/PDs are responsible for ensuring that project personnel follow all confidentiality and data protection requirements, consistent with 2 CFR 200.300(b). When applicable, PIs/PDs must ensure that subrecipients also safeguard sensitive and confidential information in accordance with 2 CFR 200.332(d).

Access to sensitive or confidential information must be limited to personnel with a legitimate business need, consistent with 2 CFR 200.303(c). JSU will maintain internal controls to safeguard sensitive and confidential information, including personally identifiable information (PII), to ensure compliance with federal statutes and regulations and the terms and conditions of federal awards in accordance with 2 CFR 200.303. Employees involved in sponsored programs must complete training on safeguarding sensitive information and internal controls as required by 2 CFR 200.303 (see [II.05.01](#) for more information).

Sponsored Program proposals or contracts may contain sensitive information, including both personal and scientific materials that the PI/PD may not wish to have distributed publicly. Sensitive information includes any data whose disclosure could cause harm, result in loss of competitive advantage, or violate federal, state, or sponsor requirements, consistent with 2 CFR 200.1.

Nevertheless, records must be made available with timely and unrestricted access to federal awarding agencies, Inspectors General, and auditors as required under 2 CFR 200.337. 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/PI 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.

All sensitive or confidential information must be stored, transmitted, and disposed of securely in accordance with 2 CFR 200.303 and applicable data protection laws. Records will be retained a minimum of three years starting from the date of the final Federal Financial Report is submitted in accordance with 2 CFR § 200.334 or longer if required by the [State of Alabama Records Disposition Authority](#) or JSU Records Retention Policy [I.05.01](#). Destruction of sponsored program records must comply with 2 CFR 200.335.

REFERENCES

[2 CRF 200](#)

RESPONSIBILITY

The Senior Vice President for Finance and Administrator and CFO is responsible for this policy.

EVALUATION

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