TO: Christine Jackson  
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FROM: Turan Odabasi  

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RE: Responsibility for research compliance at Innovation Campus

Although UNL should maintain oversight of research compliance at Innovation Campus, primary responsibility for research compliance at Innovation Campus should be handled according to the following scenarios:

1) **UNL controlled research**  
   UNL will be responsible for handling all compliance issues.

2) **Lessee contracts with UNL for sponsored research project(s) at Innovation Campus**  
   UNL will be responsible for handling all compliance issues.

3) **Lessee controlled research occurring on leased premises**  
   The Lessee will be responsible for handling all compliance issues, and the lease agreement should address this.

4) **UNL/Lessee research collaboration**  
   The Lessee will be primarily responsible for handling all compliance issues, although UNL must also maintain oversight and audit rights regarding all compliance plans. The collaboration agreement (and, if possible, the lease agreement) should address this. UNL must ensure that UNL researchers involved in such collaborations are fully cognizant of when the Fundamental Research Exclusion (“FRE”) applies and when it may not.

5) **UNL faculty member is hired as a consultant by Lessee**  
   The Lessee will be responsible for all compliance issues, although the faculty member will need to submit an appropriate request to engage in outside activity and obtain approval in advance for their outside activity. The consulting agreement between the UNL faculty member and the Lessee must make clear that
any work done by the UNL faculty member will be considered work for the Lessee and not for UNL.

6) UNL faculty member spinoff leasing space at Innovation Campus
The Lessee will be responsible for all compliance issues. Again, the lease agreement should address this. UNL should ensure that the UNL faculty member and any “hires” of the spinoff understand that “FRE” will not apply to work done for the spinoff.

Potential conflicts of interest for all UNL faculty involved in research at Innovation Campus should continue to be reported and managed via campus policy.

I expect there will be compliance scenarios that fall outside of those addressed in this memo as well as more complex compliance scenarios related to research projects funded through NIH, NSF and DOD. There is also the potential for complex compliance issues for research falling under EAR, USML, CCL, and ITAR regulations, especially with research collaborations involving other University affiliated entities such as NSRI, which will require additional planning and management. When such scenarios arise, please contact the Office of General Counsel for additional guidance.