

September 23, 2024

National Institutes of Health
Division of Biomedical Research Workforce
Office of Extramural Research
9000 Rockville Pike
Bethesda, MD 20892

Re: Arizona State University Harassment and Discrimination Protections in NIH Training Applications Letter

Effective September 23, 2024 – September 22, 2025

The purpose of this letter is to confirm Arizona State University's commitment, as requested in Notice NOT-OD-19-029 - Harassment and Discriminations in NIH Training Applications released on November 7, 2018. The signatory of this letter is a key institutional leader at Arizona State University and signature indicates Arizona State University 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

Arizona State University has the following implemented policies and procedures:

- Prohibition Against Discrimination, Harassment, and Retaliation Policy
- <https://www.asu.edu/aad/manuals/acd/acd401.html>
 - Prohibition Against Discrimination, Harassment, and Retaliation: Compliant and Investigation Procedure
 - <https://provost.asu.edu/policies/procedures/p20>
 - Reasonable Accommodations Policy
 - <https://www.asu.edu/aad/manuals/acd/acd405.html>

Arizona State University's Office of Equity and Inclusion (<https://cfo.asu.edu/equity-and-inclusion>) supports, promotes and assists with equal opportunity through affirmative action in employment, educational programs and activities in compliance with federal requirements. The Office of Equity and Inclusion scope includes collaboration and coordination with many ASU offices and departments such as 1) ASU Disability Resource Center to facilitate the ADA interactive process 2) Title IX Coordinator on

monitoring, oversight of overall implementation of Title IX at the university including training, education, communications and administration of grievance procedures 3) Office of the Provost in making determinations on policy violations and administrative actions and 4) Office of Research and Sponsored Projects Administration in meeting Sponsor requests for institutional certifications and requirements.

For Arizona State University, the Authorized Organizational Representatives (AORs) is the Office for Research and Sponsored Projects Administration (<https://researchadmin.asu.edu/>) and this Office has the authority to submit, negotiate and accept NIH Awards. If and when any Program Director/Principal Investigator (PD/PI) is placed on administrative leave or other disciplinary action which affects their ability to perform the project, the AORs would follow ASU procedures for communicating changes and updates to NIH.

Arizona State University does not tolerate discrimination, other forms of harassment, or sexual assault. ASU has taken steps and will continue to maintain compliance with NIH policies.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Clark", written in a cursive style.

Heather C. Clark

Assistant Vice President, Research Operations

ASU Knowledge Enterprise