

7.C Norms, Policies, and Regulations Guiding Scholarship and Research

7.C.1 Introduction

Honesty, candor, openness, and integrity are guiding principles that faculty members are expected to adhere to in all of their academic activities, including research and scholarship. Faculty members are also the primary source of guidance for responsible research practices among students and employees.

The University is committed to promoting a culture of safety among faculty, staff, students, and visitors; providing a safe and healthy place to work, study, live, or visit; and to protecting the natural environment. The University is committed to complying with all applicable workplace safety, health and environmental rules and regulations. The University academic, research, clinical, student, and operations units will assess the safety and environmental impact of projects/activities and will implement strategies that support successful education and research while respecting and caring for the environment, without compromising the ability of future generations to meet their needs.

Faculty play an essential role in creating a culture of safety in laboratories and other research and educational settings. [Section 605.01 of the Standard Practice Guide](#) provides critical information about faculty responsibilities for safety.

U-M's Comprehensive Compliance Program

U-M faculty, staff, and students engage in almost every activity imaginable—including, but by no means limited to, scholarship and research. For this reason, the scope of laws that apply to those activities is extensive, which makes it a challenge to understand and comply with them.

With direction from the president and the executive leadership team, the Office of the Vice President and General Counsel has created a comprehensive compliance program for the University. The goal of this overarching effort is to map U-M's legislative and regulatory compliance obligations and activities from an institutional perspective, and to make information about the U-M's obligations accessible and to identify and help to address any gaps that exist in how the University is managing its obligations.

In the area of scholarship and research, for example, the "Procedures for Investigating Allegations of Misconduct in the Pursuit of Scholarship and Research" sets forth for all members of the University community a code of conduct that has a specific reference to research activity. The text of the policy is available from the Office of the UM Office of Research (UMOR) or on the Web at <http://research-compliance.umich.edu/federal-policies-research-misconduct>.

In addition, University of Michigan Office of Research (UMOR) sponsors the online Program for the Education and Evaluation in Responsible Research Scholarship (PEERRS), a web-based instruction and certification program for members of the University community engaged in or associated with research my.research.umich.edu/peerrs/.

UMOR's website also lists additional educational opportunities in the responsible conduct of research at <http://research-compliance.umich.edu>.

Compliance Resource

To make faculty and staff aware of the laws that apply to their activities and what people must do to meet them, the University created the online [Compliance Resource Center](#).

The information provided by the center addresses the University's core areas of activity: research, teaching, health care, and athletics. One section of the website deals specifically with the important topic of conflict of interest and conflict of commitment. With regard to support functions, the site covers such key areas as people, safety, the environment, taxes, financials, facilities and other infrastructure, international activities, and information management. The site also provides information about how to register concerns about situations where the University may not be fulfilling its compliance responsibilities.

7.C.2 Conflicts of Interest and Conflicts of Commitment (Sponsored Research)

The potential for conflicts of interest or commitment can arise in a number of different situations; for a general discussion of the topic and a list of applicable University policies, see section [9.G "Conflicts of Interest and Conflicts of Commitment."](#)

In the context of sponsored research, conflicts of interest most frequently occur when there are overlapping financial interests. Faculty members are responsible for disclosing significant financial interests or management positions that may arise from relationships with sponsors or other outside entities; this may also include disclosure of financial and management interests of the faculty member's immediate family. See "[Policy and Procedures for Dealing with Financial and Outside Management Conflicts of Interest in Sponsored Projects and Technology Transfer](#)." The Proposal Approval Form (PAF), discussed in section [7.E.3 "Submission of Proposals"](#), requires certain certifications and disclosures, including disclosures regarding any significant financial interest or absence thereof. The policy and disclosure form are available on the research website.

A review procedure that involves a faculty committee is in place to review significant financial interests related to sponsored projects. If appropriate, the committee will devise and oversee mechanisms to manage any serious conflicts. In addition, advice is available from unit administrative offices or from the Office of the Vice President and General Counsel. Additional requirements may be composed by specific funding agencies.

7.C.3 Consulting/Work Outside the University

The University encourages faculty involvement in outside activities, including consulting, if this contributes to the intellectual enrichment of faculty members and their students and serves the University as a whole. It is important that these relationships, with regard to time spent and fees earned, stay in balance with other faculty obligations of teaching, research and scholarship, and service to the University and society, and that they not present a conflict of interest or a conflict of commitment. **All full-time faculty members must obtain approval from the appropriate University authority, usually the dean or director of the academic unit, when contemplating outside employment during the academic year** (bylaw [5.12](#); SPG [201.65-0](#)). See also section [9.E "Working Outside the University,"](#) and section [9.K "Use of University Equipment and Property."](#)

7.C.4 Cost Accounting Standards

Cost accounting practices must be consistent for all University activities. Adherence to University cost accounting procedures has significant implications for the preparation and approval of budget materials in all proposals to federal sponsors. Faculty should consult with the appropriate unit administrator or a ORSP project representative if they have questions regarding the application of these cost accounting standards to specific project budgets or federal sponsoring agencies.

7.C.5 Direct and Indirect Costs

Direct costs (such as salaries, equipment, supplies, and travel) can be identified and attributed to a specific project. Indirect costs (such as costs associated with use of buildings and equipment, library and computing expenses, and sponsored project administration) are common to projects, programs, or activities of the institution and cannot be easily attributed to specific projects.

The determination of direct and indirect costs on federal projects is guided by the federal Office of Management and Budget (OMB), as described in [OMB Circular No. A-21: Uniform Guidance Cost Principles](#). See also SPG [303.02](#). Non-federal funding sources may have different policies. Unit administrators or ORSP project representatives have information about policies of specific funding agencies.

7.C.6 Interdisciplinary Activity

Interdisciplinary and multidisciplinary activity is one of the great strengths of our University. The UM Office of Research, in collaboration with the deans and other faculty, is especially committed to nurturing activity by faculty who work at and across disciplinary boundaries. The Horace H. Rackham School of Graduate Studies also promotes and facilitates [interdisciplinary workshops](#) and joins people from across the institution in ways that allow them to experience and take advantage of the University as a scholarly community, for example through presentations, discussions, and debate. While departments, as they should, encourage graduate students to focus their scholarly efforts, the Graduate School seeks to remind them that they are part of a much larger intellectual endeavor.

7.C.7 Openness in Research Agreements

Openness in research agreements is such an important value that the Regents adopted a policy in 1987 to guide the University's consideration of any secrecy stipulations by a sponsor of research or scholarship. It is an absolute requirement of the Regental policy that the University will accept no research agreement that restricts its freedom to disclose the agreement's existence, scope, and purpose. The policy statement is available through SPG [303.01](#) and the research website under "Policies and Research Responsibility/[U-M Policies in "Openness in Research."](#)

7.C.8 Procurement Integrity in Federal Contracts

Federal law regulates the procurement of federal contracts with a value of more than \$100,000. Since

the law applies to federal contracts as opposed to federal grants, most faculty proposals for external research sponsorship are not affected. For additional information, consult the ORSP project representative.

7.C.9 Use of Human or Animal Subjects

The University enforces high standards for the appropriate use of human or animal subjects in research. No such use may begin without approval of the appropriate University oversight committee. On the Ann Arbor campus, committees charged with this responsibility include the [Human Research Protection Program \(HRPP\)](#), the [Institutional Biosafety Committee \(IBC\)](#), and the [University Committee on Use and Care of Animals](#).

Faculty members are responsible for ensuring that their own research with human subjects and that of the students they supervise are reviewed by the relevant committee and that the research is conducted in conformance with approved plans. Respect for participation through appropriate consent and privacy provisions, minimization of risk, a favorable risk/benefit balance, equitable selection of subjects, and protection of vulnerable populations are the major criteria considered by oversight committees. (See [UMOR Committees](#).)

Researchers who use animals in their studies are required to maintain regular contact with the [Unit for Laboratory Animal Medicine \(ULAM\)](#). This unit is responsible for the supervision and coordination of the animal care program and for assuring compliance with federal regulations. It is also an educational resource.

7.C.10 Compliance in Health Care

The compliance program at UMHS reflects its commitment to maintain the highest ethical standards and to comply with all applicable laws, policies, rules and regulations. Detailed information about [UMHS's compliance program](#) is available at on their website. See also section [9.M](#) "Compliance in Health Care."

7.C.11 Other Policies

Other Resources: The [OVPR Resources for Researchers](#) page provides a portal for U-M researchers.