



Dartmouth College
Council on Sponsored Activities

11 Rope Ferry Rd. # 6210
Hanover, NH 03755-1404
Phone: 603-646-3007
FAX: 603-646-3670

Annual Report of the Council on Sponsored Activities,
Fiscal Year 2003

The CSA meet five times during the academic year: October 18, November 13, January 13, February 24, and April 28.

The members were: Robert Donin, General Counsel; William Green, Medicine (SCGF-DMS); Robert Hansen, Tuck; Todd Heatherton, Psychological & Brain Sciences (COP), William Hickey, Pathology (DMS Dean rep); Richard Howarth, Environmental Studies (COF-A&S); Adam Keller, VP/Treas.; Rob McClung, Chair, Biology (COF-A&S); Erland Schulson, Thayer (Thayer Dean rep); Roger Sloboda, Associate Provost for Research (Provost); Nancy Wray, Director of Sponsored Projects; Martin Wybourne, Dean FAS; Charles Wyman, (SCGF-Thayer)

Note: In November the General Faculty approved the General Counsel (Bob Donin) as a voting member of the CSA.

The Council met two times during each of fall and winter terms and once in spring term, per the suggestion of Chairman Rob McClung. It is also suggested that the Council meet during the summer term, which would require any new members and the chair for the new year beginning in July would be appointed in the spring to begin July 1. Rob McClung has made the suggestion to the Associate Provost for Research. This will be the last year that the COP member will be appointed to the CSA.

Restricted Research

Government grant proposals with personnel restrictions on foreign nationals as well as restrictions on publication of research done at the College raised the issue of Restricted Research at Dartmouth. Whereas some institutions support separate facilities for restricted research, Dartmouth's concern is whether to accept restricted research under its present set of circumstances. Existing policy at Dartmouth from 1969 does not allow restrictions on the publication of research with a couple of exceptions.

The CSA Subcommittee on Restricted Research met to review the existing college policy, to discuss college policy in light of September 11, 2001, to discuss the Institute for Security Technology (ISTS) on campus, and to research policies at peer institutions. The subcommittee considered three options:

1. Maintain the current policy.
2. Permit restricted research on a limited basis.
3. Actively seek to become known as an institution receptive to restricted research.

Bob Donin drafted a temporary policy to address the current situation using two criteria: sponsored research that includes research restrictions that could be accepted without review and research requiring review by a Review Committee.

1. Those cases of restrictions to sponsored research not requiring review were:
 - a. the disclosure of confidential patient data or other types of confidential information with a named person.
 - b. a publication delay enabling the sponsor to protect patent rights without modifying the results of the invention or research in any way.
 - c. a prepublication period enabling a sponsor to review publication for proprietary information made available under a non-disclosure agreement

2. Conditions for restricted research to be accepted by the Review Committee are:
 - a. the sponsor is normally public and non-commercial.
 - b. public disclosure would endanger public interests.
 - c. nondisclosure restrictions are legitimate and justified.
 - d. the percentage of restricted research for each individual PI is small in comparison to his total scholarly endeavors.
 - e. the interests of students is protected and students are free to chose whether or not to participate in any restricted research and no academic requirements may include restricted research.

This working draft is in place pending review by the President's Executive Committee and pending updates to address newly adopted federal regulations.

In addition, the subcommittee held a meeting to discuss Sensitive But Unclassified(SBU) research at Dartmouth at the request of Provost Barry Scherr. Sensitive But Unclassified research is loosely defined as information that could be misused in the wrong hands. It can involve restrictions to publication as well as to the hiring of foreign nationals from certain sensitive countries. Currently ISTS is conducting SBU research. The questions posed were:

1. Should individual PIs be allowed to decide how the SBU designation should be interpreted for his or her own work?
2. Should a committee be formed to oversee SBU research and if so who would be on it?
3. Are restrictions prohibiting foreign nationals from working on SBU research at Dartmouth discriminatory?

It was decided that in all cases of SBU research, that the college would want to oversee such research. It was also decided that decisions about the interpretation of any research restrictions should not be left up to the PIs. The CSA Subcommittee on Restricted Research was designated as the appropriate review committee for any situation involving SBU research.

Chair McClung summarized the subcommittee's opinion in two statements in a letter to Provost Scherr:

"The committee felt that any limitation to the full participation of all Dartmouth community members in any research does indeed compromise the principles of community and open access. Yes, acceptance of limitations associated with SBU research will almost certainly be discriminatory. However, the committee also agreed that there are circumstances (e.g., protection of national infrastructure) in which such discrimination may be justified."

And, "The committee specifically questioned whether or not research (SBU or otherwise) sponsored by certain organizations, including but not limited to the CIA, should be accepted by Dartmouth. Our own view is that at the present time there is no justification for a blanket refusal to accept research sponsored by any particular agency. Rather, we believe that each project should be scrutinized as described above and its acceptability to Dartmouth determined on the specific merits of that case."

Members of the CSA Subcommittee on Restricted Research are: Chip Cobb, Bob Donin, Bill Hickey, Rob McClung, Erland Schulson, Roger Sloboda, Nancy Wray, & Martin Wybourne

I believe he is part of the subcommittee although he was not at the SBU meeting. Could be wrong, however.

Definition of PI/PD

The policy developed by the CSA Subcommittee on the Definition of PI/PD includes a general policy as well as individualized policies to be developed by the FAS, the Provost: and each of the professional schools.

The general policy consists of a definition for a PI: Principal Investigator "shall mean a single individual who in the event of an award from an external funding agency shall have the full and final responsibility for the conduct of the project as proposed."

The policy states that only full-time faculty members or full-time research positions may routinely serve as Principal Investigators on sponsored programs. There will be further additions to this policy, to be decided upon by each academic area.

Individuals who do not meet the requirements of the general definition of PI but who are qualified to direct research projects and who are seeking the status of PI may get approval by the Dean upon recommendation of the Department Chair. "Such approval will be for a specific project duration, and will allow the PI to submit a given project to multiple funding agencies."

In the case of student-initiated projects, a full time faculty member or the equivalent must serve as the Principal Investigator.

The General policy was distributed to the divisions so that they could each formulate their policy on who they would allow to serve as PIs and attached their specific criteria to the general policy. This activity was completed and returned to the Associate Provost for Research. The pending policy is on the Office of Sponsored Projects web site awaiting Trustee approval.

The Subcommittee on the Definition of PI/PD members are Chip Cobb, Bill Hickey, Rich Howarth, Roger Sloboda, Nancy Wray, Martin Wybourne and Charlie Wyman,

Conflict of Interest Policy

The Conflict of Interest Subcommittee headed by General Counsel Bob Donin spent the year developing an umbrella policy on conflict of interest that would be used both at the college and at DHMC. The policy will include subpolicies on human subject research, time commitments, purchasing, investments, and appointments. There will be no minimum thresholds for investments, and any investment will be included as assessed on an individual basis. The policy is still being written.

The Conflict of Interest Subcommittee members are Adam Keller, Elizabeth Banker, Roger Sloboda, Carl S. Demotte, Michael T. Shook, Neil Castillo, Todd Heatherton, Ken Spence, Justin D. Pearlman, Robert Donin, Michael House, and Nancy Wray

Visa Clearance for Foreign Nationals, Patriot Act Update

The Department of Environmental Health and Safety is working on a centralized purchasing system for biological agents to comply with the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 and the U.S. Patriot Act.

Both SEVIS (Student & Exchange Visitor Information System) and IPASS (Interagency Panel for Science and Security) have continuing restrictions that need to be incorporated into college programs.

CAAC Report

CAAC (Compliance Area Advisory Council) Chair Bill Hickey said that he is writing a course on compliance at Dartmouth for the Compliance website. There will be twelve units as well as an online quiz, designed for faculty and staff who are involved in research. He is working with Netcasters of Boston on this project. It will be possible to track users to assure that all those involved with research have taken the course.

Other meetings:

The Conflict of Interest Review Committee met one time in the spring to review a proposal with a potential conflict.

Sponsored Activities Awards and Proposals for FY 2003 - Attached