



Dartmouth College  
Council on Sponsored Activities

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Annual Report of the Council on Sponsored Activities  
Fiscal Year 2004

The Council on Sponsored Activities (CSA) is responsible for proposing and endorsing internal policies regulating activities sponsored by agencies outside the College. In addition, the CSA proposes and endorses institutional positions in response to policies of external sponsoring agencies as they affect the College. On a periodic basis, the CSA reviews the scope and impact of sponsored activities in the relation to institutional purpose.

During the 2004 academic year, the CSA met three times: September 25, 2003 February 20, 2004 and June 8, 2004. The members were: Robert Donin, General Counsel; Tillman Gerngross, (SCGF-Thayer); William Green, Medicine (SCGF-DMS); Robert Hansen, Tuck; William Hickey, Pathology (DMS Dean rep); Richard Howarth, Environmental Studies (COF-A&S); Adam Keller, Exce.VP/Treas.; Jane Lipson, Chemistry (COF-A&S); Roger Sloboda, Associate Provost for Research (Provost); Nancy Wray, Director of Sponsored Projects; Martin Wybourne, Dean FAS; Charles Wyman (Chair), Thayer (Thayer Dean rep).

The CSA had several ongoing activities from the 2003 academic year. Some concluded during this academic year, and others will continue into 2005, as follows.

Criteria to be Eligible to Serve as Principal Investigator

The policy that outlines who can serve as a principal investigator on sponsored projects was first developed in the sixties. During the 2003 academic year, a subcommittee of the CSA developed a revised policy that includes a general statement, and each School and the Provost area then developed specific policies to encompass the general policy and the unique criteria for each area. The revised policy was unanimously approved by the CSA on September 29, 2003 and can be found as an attachment to this report and on the website

<http://www.dartmouth.edu/~osp/policies.html>. Subcommittee members were: Nancy Wray, Chair, Chip Cobb, Bill Hickey, Roger Sloboda, Martin Wybourne, Charlie Wyman

Conflict of Interest Policy for Human Subject Research

In response to national concerns of faculty having financial interests in drugs or devices that were being tested in research clinical trials, the CSA formed a subcommittee in 2003 to develop an additional policy on conflict of interest that would relate specifically to research involving human subjects. The policy that was brought forward for approval in 2004 is an umbrella policy that will be in effect for the College and Dartmouth-Hitchcock Medical Center. The *Dartmouth-Hitchcock Clinic, Mary Hitchcock Memorial Hospital and Dartmouth College Conflict of Interest Policy for Human Subject Research* was reviewed and approved by the CSA on

September 29 unanimously following approval by the Trustees of Dartmouth College and the Governing Board of Mary Hitchcock Memorial Hospital and the Hitchcock Clinic. The policy became effective July 1, 2004.

The significant difference between this policy and the current Conflict of Interest Policy for research not involving human subjects is the elimination of financial thresholds when reporting financial disclosure. In addition, financial interests have been expanded to include gifts or funds available to the researcher beyond the current research projects, funding expected to significantly exceed the projected costs of conducting the current research project, and any other financial or personal interest which presents an actual or perceived conflict of interest, as well as compensation for services, royalty income, equity interests, intellectual property rights. The full policy is provided as an attachment to this report and can be found at <http://www.dartmouth.edu/~osp/policies.html>. Members of the subcommittee that developed the policy were Elizabeth Bankert, Neil Castaldo, Carl DeMatteo, Robert Donin, Todd Heatherton, Adam Keller, Justin Pearlman, Michael Shoob, Roger Sloboda, Kenneth Spence, and Nancy Wray.

#### Misconduct in Science Policy

Over the past year, the federal agencies have adopted the Office of Science & Technology misconduct policy. Robert Donin suggested that the CSA should review Dartmouth's current Misconduct in Science Policy (last revised in 2001) to see if it still meets the requirements set out by the federal government. A subcommittee was formed and developed the following goals: (1) review the federal misconduct in science policy, specifically the NIH policy, (2) revise the existing College policy to meet new standards, and (3) revise the process for reviewing scientific misconduct allegations. Robert Donin will work on drafting a policy over the summer. Subcommittee members are Ed Berger, Harold Frost, Bill Hickey, William Joyce, Roger Sloboda, and Nancy Wray.

#### Restricted Research

Restricted research continues to be an issue in the current federal climate. This past year the NSF implemented the Cyber Security Research and Development Act of 2002 as a condition of acceptance for awards where cyber security is involved. This act limits participation of foreign nationals as well as mandating immigration reporting compliance. The current college policy does allow acceptance of awards with restrictions except in those cases as outlined by the policy adopted in by CSA in 2003. Based on the policy, the council agreed that a current Cyber Security R & D NSF proposal could be submitted but final acceptance would be determined at the time of the award. The PI was notified of the CSA's decision. In the future, PIs will be forewarned that acceptance of the award will be conditional on CSA approval of the restrictions. It was decided that any future policy changes will wait until the report from the subcommittee looking at Independent Research Institutions and also full discussions with the faculty. The CSA also started discussions on the Export Control laws and the impact of the Office of Foreign Asset Control (OFAC) regulations that impact faculty doing research in foreign countries or with foreign nationals. Dartmouth applied for one OFAC license

for a faculty to do research in Iran. The process took over 3 months to get the approval. The CSA will be discussing the impact of these laws in the next academic year.

### Standing Subcommittees

The *Compliance Committee* met five times over the past year and covered three issues: compliance with approved animal research protocols, development of the compliance education webpage, and college surveys.

The Compliance Committee developed a review process for research compliance with animal protocols and grant proposals. The decision was to sample five grants per term, comparing the protocol approved with the grant application to the actual research being done. This process was reviewed by the ALAC and will bring Dartmouth into compliance with the agency requirements. The IACACU will review at the end of the year.

The compliance webpage will contain several new modules providing information for compliance with use of animals in research, human subject research, use of hazardous materials and appropriate sponsored financial transactions. William Hickey had been working on the modules along with other members of the committee and submitted the modules to the vendor assisting Dartmouth with the compliance website. Roger Sloboda, who now chairs the Compliance Committee will spearhead the other work on the website, including updating contact individuals and any other material noted on the compliance webpages.

After a great deal of discussion, the Compliance Committee agreed with the recommendation of Elizabeth Bankert, the Director of the Office for the Committee for the Protection of Human Subjects, that campus-wide surveys involving students that are part of a classroom assignment will no longer be designated as research. Liz and her staff will continue to be a resource for faculty and students as they put together classroom projects.

Compliance Committee members: Roger Sloboda, Chair, Elizabeth A. Bankert, Michael Blayney, Henry D. James Jr., Christopher D. Boroski, Sara Chaffee, Aine Donovan, Brian L. Ermeling, William F. Hickey, Terry A. Keane, Laura F. Miraldi, Kathy Page, Kenneth E. Spence, Michael Shoob, Rachel M. Turcotte, Pam Vernon, Nancy J. Wray

The *Independent Research Institute Subcommittee* met twice. The charge to the subcommittee was to investigate the question of whether it is in Dartmouth's best interest to establish a separate not for profit (501.(c)3) research institute where restricted research could be conducted. The initial step was to investigate comparable secured laboratories that were affiliated with academic institutions questioning how the facilities functioned in relationship to students, faculty tenure tracks, administrative security structure and faculty support for the facility. So far the investigations, via conference calls, have extended to Johns Hopkins University Applied Physics Laboratory, Penn State University, and the University of Maryland.

A second meeting of the Independent Research Institute Subcommittee was held to identify reasons for Dartmouth to consider setting up a separate Research Institute. The subcommittee identified the following considerations: academic freedom, national good, personnel restrictions,

publication restrictions, confidential/non disclosed information (sensitive, select agents information), and compliance. Subcommittee members discussed concerns and the potentials of establishing a separate research institute. Security requirements were also raised as they would apply to senior administrators. There are many unanswered questions and this subcommittee will continue its work in the coming academic year. Committee members were George Cybenko, Carol Folt, Ronald M. Green, Bob Hansen, Bill Hickey, Roger Sloboda, Nancy Wray (co-chair), Richard Wright, and Martin Wybourne (co-chair).

The *Conflict of Interest Review Subcommittee* is responsible for reviewing potential conflict of interest cases brought forward by the Director of Sponsored Projects and the Associate Provost for Research. The subcommittee reviewed four cases during the year, with three conflict management plans written that in some cases require on going reporting to the Associate Provost for Research. Much of the discussion centered around protection of students, use of Dartmouth facilities, time commitment of the faculty, ownership of intellectual property and publication rights. For those cases that involve federal funding, the federal sponsor must be notified that a conflict exists and that Dartmouth has developed a management plan. Members of the Subcommittee were Tillman Gerngross, Bill Green, Bob Hansen, Bill Hickey, Jane Lipson, and Nancy Wray

#### Sponsored Awards and Proposals for FY 2004

The summary of the Annual Sponsored Awards and Proposals for FY2004 is attached to this report and the complete report will be located at the Sponsored Projects website (<http://www.dartmouth.edu/~osp/>).

I hope this information provides a useful summary of the CSA activities during the year, but please feel free to contact me if more information or clarification is needed.

Respectfully submitted,

Charles E. Wyman  
Chair, Council on Sponsored Activities