

Draft

Chapter 5

Policy Guidelines for Sponsored Research

The following general principles govern University research sponsored in whole or in part by outside entities, including industry or government. University research is defined as any research activity using University facilities or with support from funds administered by the University. Excluded from the definition of University research is personal research not supported from external funds administered by the University and that does not require the use of University facilities or equipment to fulfill an external contractual or consulting obligation.

1. University research must advance the University's principal missions of the preservation, pursuit, dissemination, and application of knowledge. The University does not encourage its faculty to engage in classified research projects or projects that otherwise prohibit or limit publication of research results. Publication is considered to include, but is not limited to, journal publications, proceedings of meetings and conferences, student dissertations and theses, and book manuscripts. Prompt publication of results is the normal and expected outcome of a research project. Classified research projects or projects that otherwise prohibit or limit publication of research results must be justified as exceptions to this general principle. In the case of proprietary research, a delay not to exceed ninety (90) days in submission for publication may be requested by a sponsor who wishes to preview research results. In cases in which a sponsor has been afforded the right to prepare a patent application, or the University wishes to prepare a patent application, it may be agreed that submission for publication may be delayed for up to an additional six months. The research agreement governing any project should specify at the outset of the program whether the sponsor reserves the right to request a delay for either of these reasons.

2. In those research projects in which classified, otherwise sensitive, or proprietary information is provided by the sponsor prior to or during the course of the project, any limitations on the disposition of that information must be described in writing prior to the time the information is made available and any requirements of confidentiality or other limitations must be documented, provided to, and approved by the Office of Grants and Contracts Management for the Medical Center or the Division of Sponsored Research for the University, whichever is appropriate. Knowledge developed by Vanderbilt researchers on the basis of classified, otherwise sensitive, or proprietary information is to be governed by these research guidelines unless otherwise governed by terms of an authorized research agreement. Classified, otherwise sensitive, or proprietary information may be kept confidential between the sponsor and University researchers. Any requirements of confidentiality should be limited, however, especially as they apply to graduate and professional students, when those provisions inhibit in any material way the free flow and exchange of ideas important to University missions. Any participation by graduate and professional students in research that limits or restricts communication must be approved in advance by the appropriate Dean.

3. A faculty member desiring to engage in classified research must submit a written description and justification of the project, its academic merit, and the restrictions on the dissemination of its results to the appropriate Dean, who provides a written opinion of its suitability. This proposal must then be reviewed by a standing committee of faculty from a broad range of disciplines appointed by the Chancellor, which makes a recommendation and then forwards the proposal to the Provost or the Vice Chancellor for Health Affairs, as appropriate, for a final decision. The University will not approve any contracts for which the identity of the sponsor and the general nature of the work cannot be revealed to the public. Classified research or training may not be conducted in areas of the University where basic teaching and research facilities that are used frequently by members of the University community are located. Classified research will be permitted only in designated special-purpose facilities, or in affiliated Institutes that are physically separate from the main campus. No part of a thesis or dissertation submitted for an advanced degree at the University may be classified. Classified research may not be taken into consideration in decisions about promotion or tenure of faculty until the research has been declassified.

4. Consistent with the provisions of the Policy on Technology and Literary and Artistic Works, the University retains ownership of patent rights and software copyrights issued on the basis of any University research. In exceptional circumstances, deviations from this policy may be approved by the Provost or the Vice Chancellor for Health Affairs, as appropriate, on terms that become provisions of the sponsored research agreement.

5. Researchers are obligated to inform their department chairs, Deans, and the appropriate Sponsored Research office in writing in advance of project sponsorship of any special relationship that they have or intend to have with a sponsor. This disclosure should detail fully the nature and purpose of the relationship but normally need not provide specific amounts of financial reimbursement figures except when necessary to determine the existence of conflicts of interest, allocation of effort, or other University interests defined by the Provost or the Vice Chancellor for Health Affairs, as appropriate. This provision applies to all participants in a project, including faculty members, research associates, members of the staff, and students. It is expected that sponsors may inquire whether a researcher is receiving support from a competitor and whether safeguards are in place to protect proprietary information from being misused. To avoid conflicts of interest, researchers should be especially cautious when accepting support from competitor sponsors who are providing proprietary information.

6. A faculty member who serves as principal investigator on a sponsored project is responsible for justifying the appropriateness of direct costs budgeted and charged on that project in accordance with overall government regulations, sponsoring agency guidelines, conditions made as a part of an individual award, and Vanderbilt policies and guidelines. Faculty members are also responsible and accountable to University officials for the proper conduct of the project or program, including, for example, compliance with policies and procedures concerning the use of human subjects or animals in research activities, security requirements for classified or proprietary research, and environmental safety.