

**TITLE:** **INTEGRITY IN RESEARCH AND SCHOLARSHIP**  
(Relates to EL 1: General Executive Constraint)  
(Relates to EL 2: Treatment of Staff)  
(Relates to EL 5: Asset Protection)  
(Relates to EL 9: Ethical Research)

**EFFECTIVE DATE:** July 1, 2006

**PURPOSE:**

The purpose of this policy is to promote and advance a high standard of integrity in research and scholarship. The Red Deer College community has an important role to play in maintaining high standards of research and scholarship integrity. Such integrity requires careful supervision of research including that conducted by students: competent use of methods, adherence to ethical standards of discipline and the refusal to engage in or to condone instances of fraud or misconduct.

**POLICY STATEMENT:**

**Introduction**

Red Deer College through its guiding values is committed to the highest standards of integrity in research and scholarship. The College regards any action that is inconsistent with integrity as misconduct. Integrity in research and scholarship includes the principles contained in this policy, which should be interpreted with the understanding that research can involve honest error, conflicting data or valid differences in experimental design or in interpretation or judgment of information, or that professional discretion in some circumstances may be acceptable in the absence of any strict correspondence between the roles stated and the circumstances of the situation.

These principles of research integrity overlap with other areas, such as financial integrity in the use of research funds, intellectual property, and the ethical issues involving the use of human or animal subjects in research, in which the College has other established practices, guidelines and requirements stated herein or in other policies. This policy is concerned with research integrity, and does not replace any other policy statements on other areas with which this issue may overlap.

**Fundamental Principles**

1. Three fundamental principles underlie research and scholarly integrity:
  - *truthfulness* in describing the manner in which data is collected, analyzed and reported,

- scrupulousness in recognizing the authors and sources of the original research concepts and results, and
  - probity in the use of research funds.
2. The College will engage mechanisms consistent with due process and natural justice, and thus:
- allow accused persons full opportunity to respond to allegations,
  - provide an opportunity for the persons making the allegation to comment on the findings of the inquiry and the investigation, and ensure that any comments they make become part of the record,
  - report the results of the investigation to both the accused persons and the persons making the allegation, and ensure that this information is not made accessible to third parties, regardless of their role in the investigation (exceptions are outlined in the previous paragraphs),
  - report the results to the federal granting Agencies according to tri-council policy guidelines, and
  - inform the accused persons of any actions or sanctions that have been decided on as a result of the investigation.

## **Responsibilities**

1. Any faculty or staff in the employ of Red Deer College who is involved in the research enterprise will uphold the following principles:
- a. Recognizing the substantive contributions of collaborators and students; using unpublished work of other researchers and scholars only with permission and with due acknowledgment; and using archival material in accordance with the rules of the archival source;
  - b. Obtaining the permission of the author before using new information, concepts or data originally obtained through access to confidential manuscripts or applications for funds for research or training that may have been seen as a result of processes such as peer review;
  - c. Using scholarly and scientific rigor and integrity in obtaining, recording and analyzing data, and in reporting and publishing results;
  - d. Ensuring that authorship of published work includes all those who have materially contributed to, and share responsibility for, the contents of the publication, and only those people;
  - e. Revealing to the College, sponsors, post-secondary institutions, journals or funding agencies, any material conflict of interest, financial or other, that might influence their decisions on whether the individual should be asked to review manuscripts or applications, test products or be permitted to undertake work sponsored from outside sources;
  - f. Providing confidential disclosure in writing to the College regarding the development of Intellectual Property that may be owned by the College or jointly by the researcher and the College and which the researcher intends to commercialize. The disclosure is intended to protect the interests of the research enterprise and the College.

## **Authorship and Publication**

Authorship of published work will include all who have made a significant intellectual and practical contribution, and only those people.

Students and research assistants will be given appropriate recognition for authorship or collection of data in any publication.

Research teams will designate one author who is responsible for the validity of the entire manuscript. Co-authors will be responsible for the part of the publication that they have contributed.

## **Collection and Retention of Research Data**

During the process of scientific and scholarly inquiry, researchers must retain accurately recorded data in order to respond to questions regarding research. Errors may be mistaken for misconduct if the primary experimental results are unavailable.

1. A complete set of all original research data must be retained by the principal investigator for a period of 5 years.
2. Before undertaking research, investigators, supervisors, students and the College should come to a common understanding regarding ownership, intellectual property rights, storage, reproduction and publication of data, access to data and any other relevant circumstances. In the case of collaborative work, all members of the research team must have access to the relevant data at all times, subject to contractual obligations or other agreements regarding access to data.

## **Research Involving Biohazards**

No research at Red Deer College involves the use of biohazards. Should such research be conducted at the College in the future, the College will comply with recognized standards outlined in the *Health Canada Laboratory Biosafety Guidelines*, and will immediately notify relevant granting agencies.

1. The College will:
  - a. Promote integrity in research and scholarship;
  - b. Investigate possible instances of misconduct in research or scholarship, including:
    - imposing appropriate sanctions in accordance with College policy, and
    - informing the appropriate Council(s) or funding agency of conclusions reached and actions taken.
2. The College will ensure that research funds will be administered with a high degree of integrity, accountability and responsibility.

## Definitions

“Research and scholarly integrity” means:

- honesty and uprightness in dealings among colleagues, co-workers within the research and scholarly establishment as well as with students, assistants and staff on research projects, and in dealings with research and funding collaborators both within and outside the education community,
- respect for intellectual property, and
- due regard for the ethical points involved in the use of human and animal participants in research.

“Research and scholarly misconduct” means, but is not limited to:

- falsifying or fabricating research data,
- plagiarism, theft of ideas or intellectual property, or appropriation of another’s work,
- willfully misrepresenting and misinterpreting findings resulting from conducting research and scholar activities,
- failure to recognize relevant contributions of others, including students, coworkers and research assistants, in the authorship of papers or invention disclosures,
- use of unpublished works of others without permission,
- failure to honor the confidentiality that the researcher promised or was contracted to as a way to gain valuable information from a party internal or external to the College,
- retaliation of any kind against persons, acting in good faith, who have reported or provided information about suspected or alleged misconduct. Retaliation means any response by the College that adversely affects the employment or other status of the originator(s) of the allegation,
- abuse of supervisory power affecting coworkers, students and others associated with the research,
- financial misconduct, including misuse of funds acquired for research and failure to adhere to terms and conditions of grants and contracts,
- failure to report to the College an involvement in research dealing with human subject, bio-hazardous materials or animals,
- material failure to comply with relevant statutes, regulations or policies concerning the conduct of research,
- failure to disclose conflict of interest,
- conflict of scholarly interest, including suppressing publication of the work of another scholar and improper negative reviewing of a research grant application or work submitted for peer review in consideration for publication by another scholar, and
- Misconduct does not include honest errors, differences in opinion or different interpretations of scientific discoveries. Those involved in judging research and scholarly misconduct must bear in mind the ethical sensitivities of the period in which the research was conducted. Although a researcher may have

conscientiously followed the standards of the period, protocols previously in use may not necessarily accord with current standards on the use of data.

"Advisor" means any person selected by the Respondent, including a person selected by the Faculty Association of Red Deer College (FARDC) at the request of the Respondent.

"Allegation" means information in any form forwarded to the Associate Vice President, Strategic Planning and Research relating to possible misconduct in scholarly activity.

"Complaint" means a written, signed allegation of misconduct forwarded to the Associate Vice President, Strategic Planning and Research containing sufficient detail to enable the Respondent to understand the allegations.

"Complainant" means the individual who signed the written complaint.

"Respondent" means a person in respect of whom the Associate Vice President Strategic Research and Planning has received information relating to possible misconduct in scholarly activity.

"Scholarly Activity" will include all scholarly activity, research (including Graduate and Undergraduate), or other creative activity undertaken by a faculty member.

## **Promoting Integrity and Preventing Misconduct in Research**

### **1. Researchers and Scholars**

The primary responsibility for high standards of conduct in research and scholarship rests with the individuals carrying out these activities. The College expects researchers and scholars adhere to the principles detailed in this policy.

### **2. The College**

The College is responsible for investigating allegations of misconduct involving researchers, trainees or research staff. The College will promote understanding of the issues involved in integrity in research and scholarship as it offers a valuable means of preventing misconduct.

#### **2.1 Promoting Integrity in Research and Scholarship**

Integrity in research and scholarship is best encouraged by developing awareness among all involved of the need for the highest standards of integrity, accountability and responsibility.

The College will strive to educate all that are involved in the collection, recording, citing, reporting and retention of scientific or scholarly material of its high standards of integrity. The College will promote the understanding of research ethics and integrity issues by making policies readily available to all staff and referring researchers to the policy

statements, and by providing information sessions on the principles and practices of scientific integrity for scientists, scholars, visiting graduate students, students and other trainees, and research staff. The Associate Vice President, Strategic Planning and Research will be responsible for promoting integrity in research and scholarship.

## 2.2 Investigating Allegations of Misconduct in Research and Scholarship

The College is responsible for receiving, investigating, documenting and judging—within an established time period—allegations of misconduct involving their own researchers, trainees or research staff.

Allegations of misconduct might involve past or present grantees, researchers, scholars, trainees, assistants, staff, students, or others working in research enterprises, as well as private individuals, organizations and partners involved in collaborative research projects. These procedures apply to all allegations and complaints of misconduct against any person holding an appointment or position administered by or related to Red Deer College, and also apply with such variations as are necessary to complaints against visiting scientists, graduate students, and persons holding Post-Doctoral Fellowships or their equivalent. Allegations against students are governed by the existing policy dealing with Academic Misconduct.

Allegations may arise from anonymous or identified sources within or outside the College; the allegations may be well founded, honestly erroneous or mischievous. Whatever their source, motivation or accuracy, such allegations have the potential to cause great harm to the persons accused, to the accuser, to the College, and to research and scholarship in general.

## 3. Research Funding Councils and Granting Agencies

The National Granting Councils, namely the Canadian Institutes of Health Research (CIHR), the Natural Sciences and Engineering Research Council (NSERC), and the Social Sciences and Humanities Research Council (SSHRC), have issued a joint statement on Integrity in Research and Scholarship. The statement appears in the NSERC and SSHRC Program Guide and is posted on the SSHRC web site. In addition, the SSHRC has established Procedures for Responding to Allegations of Research and Scholarly Misconduct. Researchers working with funds from any of the three Councils should consult the statement.

Allegations of misconduct made to funding Councils or Granting Agencies might involve past or present grantees or awardees, or trainees or staff supported from their funds or working in laboratories receiving their funds. Such allegations might also arise from the peer review processes of the Councils and Granting Agencies. Under provisions of the Privacy Act, such allegations of misconduct in research will be transmitted only with the permission of the person making the

allegations. In that event, the College will carry out an investigation and inform the Council or Granting Agency of the outcome.

In cases in which misconduct is concluded to have occurred, the Council(s) or Granting Agency may consider imposing its/their own sanction(s) in relation to grants made to the individual(s) implicated. These sanctions may include, but are not limited to:

- refusing to consider future applications for a defined time period;
- withdrawing remaining installments of the grant or award;
- seeking a refund of all or part of the funds already paid as a grant or award for the research or scholarship involved;
- seeking other forms of redress such as an apology where the reputation or integrity of the Council or Granting Agency has been seriously jeopardized.

## **Reporting Misconduct and Allegations**

Reporting misconduct is essential to ensure that the research community maintains both integrity and public confidence in the research enterprise.

Individual collaborators and collaborating organizations may, at the outset of a research partnership, have a number of expectations and understandings regarding the benefits arising from the research, intellectual or physical property, or acknowledgment and remuneration. Charges of misconduct may subsequently arise when there is a perception that these expectations are not being fulfilled.

As part of the peer review process, peer review committees may identify and report evidence of misconduct.

In addition, any College staff, student or member of the public may identify and report evidence of misconduct.

All those involved in the research enterprise are advised to report any alleged misconduct directly to the institution of the accused. A question of misconduct may arise involving an individual at an institution other than that of the person making the allegation. If a person has contacted the institution about a matter of misconduct, and the institution is found unable or unwilling to deal with the problem, the College will process the allegation.

It is not necessary to have categorical evidence of misconduct; truthfully reported substantial information is sufficient to file a report.

All allegations will be forwarded to the Associate Vice President, Strategic Planning and Research who will then assess whether there is cause to suppose misconduct, and if so, review its severity and where necessary bring the case forward for investigation. Where the Respondent is the Associate Vice President, Strategic Planning and Research, any allegations will be forwarded directly to the Executive Vice President

Academic. The Executive Vice President Academic will then be responsible for ensuring that these procedures are followed.

The Associate Vice President, Strategic Planning and Research may delegate any function specified in these procedures but is ultimately responsible for ensuring that the procedures are complied with, and that all allegations and complaints are properly investigated, documented and disposed of.

## **Confronting Alleged Misconduct**

### **1. Complaints**

- 1.1 All faculty researchers, students, research assistants and staff have an obligation to report to the Associate Vice President, Strategic Planning and Research any circumstances which they believe involve a breach of the RDC Policy on Integrity in Research and Scholarship. Complaints received by other individuals or administrators must be channeled to the Associate Vice President.
- 1.2 The Associate Vice President, Strategic Planning and Research will take reasonable steps to protect against retribution or coercion of individuals who report misconduct.
- 1.3 A formal complaint must be made in writing; signed and dated before the Associate Vice President, Strategic Planning and Research takes any steps against the individual whose conduct is the subject of allegations of misconduct. A complaint may be formulated by any person who has reviewed the relevant information.
- 1.4 A complaint in writing will contain sufficient detail to enable the Respondent to understand the matter under review. The complaint will identify the person or persons who made the allegations if the Associate Vice President, Strategic Planning and Research deems that the identification is necessary to evaluate the evidence in the complaint. However, no such person will be identified unless that person has expressly so agreed.
- 1.5 Anonymous allegations will not normally be considered. However, if the evidence is compelling, the Associate Vice President, Strategic Planning and Research may elect to initiate a preliminary investigation.
- 1.6 Upon receipt of a written complaint, the Associate Vice President, Strategic Planning and Research will conduct a preliminary review of the complaint, seeking information from relevant sources. Within five working days of receiving the complaint, the Associate Vice President, Strategic Planning and Research will discuss the nature of the complaint with the Respondent. The Respondent will be informed of his or her right to have a third party present at this meeting (and any future meetings).
- 1.7 The Associate Vice President, Strategic Planning and Research may attempt to resolve complaints that do not warrant an investigation (e.g. carelessness) by meeting with the relevant parties and providing a decision in writing. The complaint will be considered resolved through an informal process when the Complainant and the Respondent confirm that

it has been resolved to their satisfaction (resolution, in this context, implies that the complaint is withdrawn and the Complainant and the Respondent unreservedly accept any additional resolution matters).

- 1.8 The Associate Vice President, Strategic Planning and Research may, at his or her discretion, determine that the complaint is without foundation and dismiss the complaint. The Associate Vice President, Strategic Planning and Research will immediately notify the Complainant and Respondent, providing written justification of the decision. The Complainant may appeal the dismissal of the complaint, in writing, to the Executive Vice President Academic, whose decision regarding complaint dismissal is final.
- 1.9 If the Associate Vice President, Strategic Planning and Research is unable to resolve the complaint and determines that an investigation is warranted, he or she will refer the complaint to a committee for investigation within ten working days of the receipt of the complaint.

## 2. Investigations

- 2.1 An investigation is a formal examination and evaluation of relevant facts to determine whether misconduct has occurred, and if so, to assess its gravity and propose subsequent action.
- 2.2 When referring the complaint to a committee (1.9), the Associate Vice President, Strategic Planning and Research will appoint committee members to conduct an investigation, will advise the Respondent of the composition of the Committee, and will also advise any person who is identified in the written complaint or who was identified to the Respondent during the preliminary investigation of the complaint. The committee will be appointed and individuals notified within ten working days of the receipt of the complaint.
- 2.3 The Committee to conduct an investigation will consist of a Chair and two members who will be continuous faculty with sufficient expertise to address the issues involved. Members of the Committee will be from a Department or Program other than the Respondent's, or from outside the College. In addition, the Respondent or Committee may request that a representative of the Executive of the Faculty Association of Red Deer College be present as a participating but non-voting member of the Committee to conduct an investigation, provided this individual is not in any conflict of interest situation with either the Respondent or the complaint.
- 2.4 The complainant and respondent will be given an opportunity to comment on the composition of the Committee to conduct an investigation and any objection will be made to the Associate Vice President, Strategic Planning and Research within seven working days. The Associate Vice President, Strategic Planning and Research's disposition of any such objection will be final.
- 2.5 The Committee will oversee the process of gathering information and conducting interviews with relevant parties. All interviews will be

documented. The privacy of all individuals will be protected at all times during the complaint process. Documentation and materials will be recorded and held confidential to the parties involved in the dispute process and determination, under the jurisdiction of the Office of the Associate Vice President, Strategic Planning and Research. Reports and records will be kept by the Associate Vice President, Strategic Planning and Research for five years and access to these records will be by application to the Associate Vice President. Access to the information will comply with Freedom of Information and Protection of Privacy guidelines.

- 2.6 The Committee to conduct an investigation will invite the Respondent, accompanied by an advisor if the Respondent so desires, to address it and make submissions in writing prior to its seeking or obtaining any other information or submissions. Thereafter, the Respondent may attend other meetings of the Committee only by invitation of the Chair until the Committee has received all the information or submissions it deems appropriate.
- 2.7 The Committee to conduct an investigation will provide the opportunity for a person who made an allegation leading to the complaint, accompanied by an advisor, if desired, to address it in speech or in writing. If that person chooses to participate in the process and to be kept informed of the status of the investigation, the Committee may comply with the request. Moreover, if that person chooses to participate in the process, that individual will also agree to respect the confidentiality of the process.
- 2.8 Prior to making its decision, the Committee will advise the Respondent in sufficient detail of the evidence being considered by the Committee and will invite the Respondent and advisor, if desired, to meet with it and respond to that evidence orally and/or in writing.
- 2.9 Prior to receiving evidence from any person not already identified in the complaint in writing or identified to the Respondent during the preliminary investigation, the Committee will advise that person that it may be necessary in the interests of justice to reveal that person's identity to the Respondent.
- 2.10 Within ninety calendar days of being appointed, the Committee will complete its investigation and will report its reasoned decision in writing to the Associate Vice President, Strategic Planning and Research. That reasoned decision will at all times be the confidential property of the Associate Vice President, Strategic Planning and Research. The Chair of the Committee will also send a copy of the reasoned decision to the Respondent and the Complainant at the same time as it is forwarded to the Associate Vice President, Strategic Planning and Research.
- 2.11 The Committee's reasoned decision (hereafter deemed an investigation report) will include: 1) a description of the allegations investigated, 2) a list of the individuals responsible for conducting the investigation, 3) a review of the steps taken to prevent real or apparent conflicts of interest in the investigation, 4) the methods and procedures used to gather information and to evaluate the allegation, 5) a summary of the records compiled, 6)

- the conclusions of the investigation, and 7) a description and explanation of any sanctions recommended and/or imposed by the College.
- 2.12 The Committee is authorized to make decisions regarding misconduct, and their reasoned decision will be binding on the College, Respondent and Complainant.
  - 2.13 The Associate Vice President, Strategic Planning and Research will advise the Executive Vice President Academic and any person identified to the Respondent of the complaint's outcome. No person will use any of the reasoned decision or outcome information for any purpose other than for these procedures or for a related purpose under the Faculty Association of Red Deer College Collective Agreement.
  - 2.14 If the investigation was requested by a Granting Council or Funding Agency, the Chair of the Committee will send a full copy of the investigation report to the Granting Council or Funding Agency within 30 days of the conclusion of the investigation, whether or not misconduct is concluded to have occurred.
  - 2.15 If the investigation was initiated internally, within Red Deer College, and the Committee concludes that misconduct has occurred in research funded by a Granting Council or Funding Agency, the Chair of the Committee will send a full copy of the investigation report to the Granting Council or Funding Agency within 30 days of the conclusion of the investigation.
  - 2.16 Funding Councils and/or Granting Agencies will have an opportunity to review the investigation report in order to ensure that the process is consistent with the College's integrity policy, and to determine whether the findings and conclusions of the investigation are based on solid evidence and reasonable arguments.
  - 2.17 On reviewing the report, funding Councils and/or Granting Agencies may request clarification or additional information or a subsequent follow-up to ascertain whether the recommendations contained in the investigation report have been implemented.
  - 2.18 Should the report continue to be deemed unsatisfactory, funding Councils and/or Granting Agencies may request that the College conduct a further investigation, either with the same or a different investigation committee. If the final report of this continued or new investigation fails to confirm misconduct, the case will be closed and all information pertaining to the case will be destroyed.
  - 2.19 Where misconduct is confirmed, the Associate Vice President, Strategic Planning and Research will be responsible for the protection of agency funding by informing the Chief Financial Officer to withhold any payments or disbursements of Agency funds, if such action is deemed appropriate.

### 3. Appeals

The Respondent or Complainant may submit a written appeal to the Executive Vice President Academic within one week of the communication of the decision of the Committee. The Executive Vice President Academic will review the written

appeal and the final report of the Committee, and render a decision within five days of the receipt of the appeal. The decision of the Executive Vice President Academic will be final and binding.

#### 4. Protection of Interests in Cases of Alleged Misconduct

Whatever their source, motivation or accuracy, allegations of misconduct have the potential to harm:

- the persons accused,
- the persons making the allegation,
- the College, and
- research and scholarship in general.

Therefore, at any stage of an investigation, the Associate Vice President, Strategic Planning and Research is responsible for promptly notifying the Councils and Granting Agencies funding the scholarly activity in the event of:

- a. an immediate need to protect:
  - i. funds or equipment,
  - ii. the interests of the person making the allegation,
  - iii. the interests the persons accused of an allegation,
  - iv. the interests of research participants, or  
the interests of the co-investigators and associates.
- b. reasonable indication of a possible criminal violation (in which case the funding Councils and/or Granting Agencies must be informed within seven working days of the College receiving the information), and/or
- c. the likelihood that the alleged incident will be reported publicly.

As far as possible, and given the need for due process in conducting investigations, the Associate Vice President, Strategic Planning and Research is, moreover, responsible for protecting:

- the privacy of the persons accused and of the person making the allegations,
- persons deemed to have made responsible accusations,
- persons who have cooperated with institutional investigations, and
- persons who have alleged that the College has inadequately responded to an allegation of misconduct.

If charges of misconduct have been dismissed, the Associate Vice President, Strategic Planning and Research will extend efforts to protect or restore the reputation or credibility of any person(s) wrongly accused or implicated, by:

- ensuring that copies of documents and related files provided to third parties have been destroyed,
- ensuring that all references to the allegation of misconduct are expunged from the personnel files of persons wrongly accused,
- ensuring that all persons who have been interviewed or otherwise informed of the charges are notified in writing that the charges have been dropped, and

- consulting those wrongly accused regarding actions that might be taken on their behalf to restore their reputations, such as publicizing the final outcome in forums in which allegations may have previously been published.

Moreover, persons identified in cases of misconduct are reciprocally obliged to maintain confidentiality and to cooperate with the proceedings of an inquiry or investigation.

It must be made clear; however, that anyone implicated in an investigation of an integrity case cannot be guaranteed anonymity should that case be brought to court.

It is expected that every precaution be taken by any College staff or student to ensure that an allegation does not taint a researcher's reputation, until misconduct is proven. All staff or students who receive or learn of an allegation of research and/or scholarly misconduct are enjoined to protect, to the maximum extent possible, the privacy of the persons accused, the persons making the allegation, and any other affected individuals. Discussion on any cases should therefore be restricted to those who need to know the details in order to determine whether there is cause for further action.

The Associate Vice President, Strategic Planning and Research is responsible for ensuring administrative consistency in all cases of alleged misconduct in order to protect both the integrity of the adjudication processes and the individuals implicated in a case.

In addition, certain portions of the documentation dealing with an allegation of misconduct might be accessible to third parties under the Access to Information Act of Canada and Freedom of Information and Protection of Privacy Act of Alberta, although personal information, as defined in the Privacy Act, is not accessible. Personal information that is related to anyone that is not an employee of a federal institution qualifies for exemption from release, as does any genuinely confidential third party information, such as a trade secret. Any information not qualifying for an exemption would have to be disclosed upon request.

Accused persons, as well as the informants and witnesses affected by inquiries and investigations are all entitled to fundamental fairness throughout the proceedings. Whatever the outcome, the Associate Vice President, Strategic Planning and Research will take all reasonable steps to mitigate the consequences of the process for individuals who have been unintentionally adversely affected by it.

## 5. Institutional Responsibility

Whenever an investigation concludes that misconduct warranting dismissal is substantiated, appropriate arrangements will be made to ensure that all other

scholarly activity previously undertaken by the Respondent at this College is evaluated to determine its integrity.

6. Time Limits

All time limits in these procedures may be extended for good reason of which a formal record is kept. The Respondent will be advised of both the extension of time and the rationale.

**ACCOUNTABILITY:**

President

**RESPONSIBILITY:**

Associate Vice President,  
Strategic Planning and Research

**Consultation for Review:**

Associate Vice President,  
Strategic Planning and Research

**Policy Review Date:**

May 31, 2008

**Associated Policies:**

Intellectual Property  
Conflicts of Interest and Mandatory  
Disclosure  
Ethical Conduct for Research Involving  
Human Participants