

Grace Hiles

From: Kenneth Katkin
Sent: Tuesday, November 29, 2016 7:30 PM
To: Steven Weiss; Alexis Miller; Brooke Buckley; Steven Finke; Kimberly McErlane; Jane Hammons; Andrea Watkins; Kirsten Schwarz; Blas Puente-Baldoceda; Mauricio Torres; Kurt Sander; Jaesook Gilbert; Young Kim; Donelle Dreese; Gary Newell; John Farrar; RACHELE VOGELPOHL; Sharlotte Neely; Kalyani Ankem; Linda Wermeling; Cory Scheadler; Michael Carrell; SHAWN NORDHEIM; Kathleen Fuegen; Tracey Bonner; Belle Zembrodt; Shannon Alexander; Hayley Ericksen; Banwari Mittal; Kenneth Katkin
Cc: Michael Baranowski; Grace Hiles; Sue Ott Rowlands; Samantha Langley
Subject: Agenda for Dec 1 PCC Meeting (w/ attachments)
Attachments: Centers & Institutes - Policy Proposal.pdf; Financial Conflict of Interest Disclosure For Research.pdf; PCC Agenda for 12-01-2016.doc; PCC Comments on Centers & Institutes Proposal.docx; PCC Minutes 11-17-06.docx

PCC Members (2016-17)----

Attached please find the Agenda for next PCC Meeting, which will take place this Thurs Dec 1 at 3:15pm in Room SU 109. I apologize for the extreme delay in getting this Agenda out. I traveled over the Thanksgiving break and was unable to work on it while traveling. We have a light Agenda for this Thursday, and I hope everyone will have a chance before the meeting to review the Nov 17 minutes and the one new document (discussed below) that is attached.

The Agenda for Dec 1 begins with our voting item on the University's new policy proposal on [Establishing, Reviewing, And Discontinuing Academic Centers & Institutes](#), which is currently out for public comment. The attached draft policy document associated with this item is also online at: http://policy.nku.edu/content/dam/policy/docs/a-through-z-policy-finder/CommentPeriod_EstablishingDiscReviewCenters.pdf. At our most recent meeting on Nov 17, we voted to make a number of recommendations concerning this draft policy proposal. I have written up a memorandum (attached) setting forth my understanding of our recommendations, which I hope we can discuss and finalize at this week's meeting. This Memorandum is the one new document that I hope PCC Members can review before the meeting, despite the late date you are receiving it.

Second on our Agenda is a discussion item on a new proposed policy on [Financial Conflict of Interest Disclosure For Research](#), which is currently out for public comment. This item was distributed at our Nov 17 Meeting, but we ran out of time before we could discuss it. At this week's meeting, I will ask whether PCC would like to weigh in on this proposal.

The third item on this week's Agenda is the preliminary discussion of RPT issues, including annual versus biennial review. I have not distributed any documents for this discussion. At this point, I hope we can simply discuss what changes to the RPT process the PCC Members think are needed, if any.

Some additional items are listed on the Agenda, but I do not anticipate actually reaching any of them. I am merely listing them on the Agenda because they are open PCC items that will return to the Agenda in a near-future meeting.

Although we already have a busy docket, please let me know if you have any other items that you think PCC should consider taking up.

Best,
--Ken Katkin, PCC Chair (2016-17)
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Professional Concerns Committee Agenda for Dec 01, 2016

SU 109
3:15 pm

1. Call to Order, Adoption of Agenda
2. Approval of Minutes from PCC Meeting of Nov 17, 2016
3. Chair's Report and Announcements
4. Old Business
 - Voting Item: **Reviewing Centers & Institutes** (2 attachments)
5. New Business
 - Discussion Item: **Financial Conflict of Interest Disclosure For Research** (1 attachment)
 - Discussion Item: **RPT Issues: Biennial Review, Standard for Tenure in Non-Mandatory Year, Conditions To Be Removed** (no attachments)
6. Old Business - For Future Meeting
 - Discussion Item: **Intellectual Property Policy**
 - Discussion Item: **Academic Freedom of Faculty Members**
 - Discussion Item: **Evaluation of Administrators**
 - Discussion Item: **Faculty Senate Role in NKU Policymaking Process** (no attachments)
 - Discussion Item: **NKU Information Security Policy**
8. Adjournment

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ESTABLISHING, REVIEWING, AND DISCONTINUING ACADEMIC CENTERS & INSTITUTES

POLICY NUMBER: RESERVED FOR FUTURE USE

POLICY TYPE: HYBRID - ACADEMIC/ADMIN

RESPONSIBLE OFFICIAL TITLE: VICE PROVOST FOR GRADUATE EDUCATION, RESEARCH, AND OUTREACH

RESPONSIBLE OFFICE: OFFICE OF THE VICE PROVOST FOR GRADUATE EDUCATION, RESEARCH, AND OUTREACH

EFFECTIVE DATE: UPON PRESIDENTIAL APPROVAL

NEXT REVIEW DATE: PRESIDENTIAL APPROVAL DATE PLUS FOUR YEARS

SUPERSEDES POLICY DATED: N/A

REQUIRES LEGAL/COMPLIANCE REVIEW:

(PER SECTION V. OF THE APPROVED POLICY REQUEST FORM) YES NO

REQUIRES I.T. POLICY COUNCIL REVIEW:

(PER SECTION V. OF THE APPROVED POLICY REQUEST FORM) YES NO

REQUIRES PROFESSIONAL CONCERNS COMMITTEE REVIEW:

(PER SECTION V. OF THE APPROVED POLICY REQUEST FORM) YES NO

REQUIRES HUMAN RESOURCES REVIEW:

(PER SECTION V. OF THE APPROVED POLICY REQUEST FORM) YES NO

REQUIRES BOARD OF REGENTS APPROVAL:

(PER SECTION V. OF THE APPROVED POLICY REQUEST FORM) YES NO

I. POLICY STATEMENT

Academic centers and institutes at Northern Kentucky University (NKU) are administrative units that are established to strengthen and enrich the University's core mission of teaching, research, and public service. Centers and institutes foster the interdisciplinary collaboration that provides enhanced opportunities for faculty, staff, and students and heightens the University's impact regionally and statewide. Centers and institutes are partnerships that maximize the capacities of NKU as a whole and reduce duplication within it. The University recognizes that academic centers/institutes require a commitment of resources (including faculty, staff and space). Therefore guidelines need to be explicit regarding the criteria for establishing centers and institutes, an understanding of the expectations regarding outcomes, the need for annual reports and periodic reviews, and mechanisms for discontinuing academic centers and institutes

II. ENTITIES AFFECTED

Describe the positions, units, departments, groups of people, or other constituencies to which the policy applies or has a material effect.

Academic Affairs, including the Provost's Office, college deans, department chairs, center directors and staff; Administration & Finance; Advancement; Human Resources; Legal Affairs; Student Affairs

III. AUTHORITY

If applicable, please provide citations to any sources of authority for the policy. Examples include state or federal laws, Governing regulations, Board of Regents minutes, or an external accreditation agency.

[Click here to enter text.](#)

IV. DEFINITIONS

Define any terms within the policy that would help in the understanding or interpretation of the policy.

For the purposes of classification within NKU, the term institute may also refer to a unit with a broader scope of activity than a center and may indicate a unit that contains smaller centers as separate units within its administrative structure. It is expected that most institutes would involve faculty from multiple departments and schools/colleges. Centers and institutes endeavor to cross disciplinary and departmental lines in order to advance knowledge in new directions or provide services to new constituencies. Although centers and institutes do not have primary jurisdiction over academic curricula, they may offer courses in cooperation with academic units.

This policy excludes those Centers or Institutes that are physically located at NKU, but not funded by NKU.

A center or institute will identify its primary focus within the university mission: research, instruction or outreach.

- A research center or institute has research as its primary mission. Although classified as a research center, such a unit may also provide instruction, training, technical assistance, or public service programs. Although such units do not have jurisdiction over academic curricula, they may offer courses in cooperation with academic units.
- An outreach center or institute has public service or technical assistance as its primary mission. Research, instruction, and training activities may also be conducted as secondary components of the mission. Although such units do not have jurisdiction over academic curricula, they may offer courses in cooperation with academic units.
- An instructional center or institute has training or instruction as its primary mission. These units may also conduct research and public service activities. Although instructional centers and institutes do not have primary jurisdiction over academic curricula, they may offer courses in cooperation with academic units.

VII. PROCEDURES

*Describe the **MINIMUM ACTIONS** required to fulfill the policy's requirements. This section should **NOT INCLUDE** internal protocols, guidelines, optional or purely desirable actions.*

1. Center Oversight

At Northern Kentucky University, academic centers and institutes operate within the Division of Academic Affairs and are situated either as a college center/institute or as a center/institute reporting to the Provost or his/her designee. College level centers and institutes will report to the dean of the college or to a department chair within the department. In some instances, transdisciplinary centers/institutes may report to more than one dean or provost designee by virtue of a Stakeholders Committee. In these instances, a 'lead dean' will be appointed by the Provost to convene the Stakeholders Committee. The committee will provide oversight for the transdisciplinary center/institute and will advise the director on programmatic direction.

College-based centers and institutes (as well as those existing within the Office of the Provost) will have a director and an advisory board. Center and institute directors are responsible for the day-to-day programmatic, fiscal, and personnel decisions associated with the center and institute mission and core personnel. The center or institute director will coordinate programmatic activities, seek external funding where appropriate, convene periodic advisory board meetings, respond to assessment and administrative program review processes, and ensure the viability of the center or institute in meeting its objectives. The advisory board has advisory responsibilities to the center or institute and makes recommendations to the director on programmatic direction. The advisory board does not have the authority to make hiring offers to directors or other staff or to access, use, or otherwise control funds associated with the centers and institutes. Centers and institutes will address aspects of their management, such as the appointing and staggering terms of board members, through bylaws, Memoranda of Understanding (MOUs), or other governing documents.

Not later than the fourth year following the initial appointment, and not less frequently than every five years thereafter, each center or institute will undergo a program review, which will include elements of director performance. The Vice Provost for Graduate Education, Research and Outreach will maintain the schedule of center reviews, will initiate the program review, and will meet with the director and his/her supervisor(s) to discuss the outcome of the review. The director is then responsible for implementing the agreed-upon recommendations.

Final authority for the establishment of a center or institute rests with the NKU Board of Regents, upon recommendation of the President.

2. Establishment of a New Academic Center or Institute

The establishment of a new academic center or institute requires careful deliberation that includes a justification of need and the potential for making meaningful contribution. The center or institute should not duplicate activities already being performed elsewhere at NKU and should have a focus that is broader than the work of any one individual. Establishing a new center or institute is a two-phase process consisting of a pre-proposal and a full proposal.

To request authorization to establish a new center or institute, a pre-proposal must be submitted to the Vice Provost for Graduate Education, Research and Outreach. The pre-proposal should include the following information:

- Proposed name and type of center or institute (research, instructional, outreach)
- Relevance of the proposed center or institute to the mission of NKU, specifically how it will further the university's strategic plan
- Mission and goals of the proposed unit and an explanation of how the new unit will be uniquely positioned to meet these objectives
- Description of how the proposed unit might interact with and complement other centers, institutes, and units at NKU and within the commonwealth, and proposed relationships with other relevant units and potential partners
- List of the people and units involved (including the name of the proposed director, if known)
- Organizational structure, including the proposed composition of the advisory board
- Estimated funding needed to initiate and sustain the proposed center or institute for five years and potential sources of funding during that period
- Estimated space, facilities, and equipment needs and plans for meeting these needs
- Proposed timeline for establishing the center or institute

The pre-proposal must include a letter of endorsement from the responsible leader(s) of the proposed administrative location of the center or institute (e.g., dean for a college-level center, department chair and dean for a department-level center, vice provost or vice president for a university-level center).

The Provost, in consultation with the Vice Provost, will review the pre-proposal and communicate a decision regarding permission to submit a formal proposal to the faculty/staff wishing to plan and the leadership of the unit(s) where the new center or institute would be established. An expected timeline for completion of the full proposal will be determined at this time. The planning period will have a maximum duration of two years. If a full proposal is not presented within two years, a new pre-proposal must be submitted. Should the pre-proposal be denied, the Vice Provost will provide a written response detailing reasons for the lack of support.

When planning is complete, the faculty/staff proposing the new academic center or institute will submit a formal proposal to the Vice Provost for Graduate Education, Research and Outreach. The minimum required documentation for the proposal to establish includes:

- A name for the proposed center or institute that appropriately reflects the unit's mission and scope, and is not similar to the name of an existing unit
- The name and contact information for the tenured faculty member(s) who will provide leadership to the center/institute, and a brief description of qualifications
- A list of all participating or affiliated faculty who have confirmed their interest and commitment to actively participate in the establishment of the new center or institute. Rank, department affiliation, expected contribution, and contact information for each participating faculty member must be included in the full proposal.
- Description of the organizational structure, including reporting lines; staffing; description of the membership and function of advisory boards; and an organizational chart showing both the unit's relationship to existing campus units and the internal organization of the unit. Confirmation that all impacted units are familiar with the plan and supportive of the proposal, in the form of letters of support, must be included.
- A mission statement that clearly describes the purpose for establishing the center or institute. An explanation as to how the mission is unique and distinct from other units already established on campus should be included.
- Goals for the new center or institute. What does the center/institute expect to accomplish? The outcomes should be clear and their impact should be measurable. Clearly justify how the center/institute will enhance NKU's reputation.
- The anticipated benefit of the unit's work to the research, instructional, or outreach programs at NKU, and, if inter-institutional arrangements are involved, the anticipated benefit to the participating institutions.
- Description of space, facilities, and equipment needs for the next five years and how those needs will be met.
- A description of how the center will involve and support undergraduate and/or graduate students.
- A five-year budget detailing personnel and non-personnel costs and sources of revenue. Are the necessary funds available? If funds are not already available explain and justify the source of additional funds that will be required to operate the proposed center or institute. Clearly delineate the resources that will be necessary for the sustainability of the center/institute and plans for obtaining them.
- A description of how the achievement of the unit's mission, goals, and objectives will be measured, documented, and assessed.

The Provost, in consultation with the Vice Provost, will assess the request, focusing on the degree to which the proposed center will contribute to the University's mission, objectives and strategic plan; the

proposed budget; and the degree to which sufficient funding can be secured to support the proposed center. The Provost will determine whether to (1) approve the request to establish and forward it to the President for approval or (2) deny the request and communicate that decision to those submitting the proposal. If the Provost recommends that the center or institute be established and the President approves the Provost's recommendation, the President will forward the recommendation to the Board of Regents for final approval.

3. Academic Center or Institute Governance

Once final approval has been granted for the establishment of a new academic center or institute, a charter must be created and approved by the Vice Provost for Graduate Education, Research and Outreach. The official charter will be kept on file in the Vice Provost's office, which will also maintain the schedule for periodic reviews.

4. Termination or Realignment of Academic Centers or Institutes

A center or institute may be discontinued for a variety of reasons, including: financial viability; lack of fit with departmental, college, or institutional missions or objectives; insufficient contributions in terms of mission-driven activity; lack of faculty support.

Any center/institute that has not been reviewed within five years will be automatically discontinued.

The administrative officer to whom the center or institute reports, in collaboration with the center director, will develop a plan for phasing out the unit to allow for orderly termination or transfer of contractual obligations and an effort to find alternative employment for full-time staff. The phase-out period may not be for more than one year after the end of the academic year in which final approval is given to discontinue the center or institute.

The director will provide written notice of intent to terminate or realign an academic center or institute, with copies to appropriate deans and department chairs, to the Vice Provost.

VIII. REPORTING REQUIREMENTS

Describe any required reports related to the policy. Include the position title of the official or name of the department responsible for furnishing the report, and the internal and external bodies to which the report must be provided.

Each center or institute must submit an annual report (based on a template provided) that documents accomplishments and productivity, including funding obtained during the year and a current budget. As well, an updated list of the participating faculty, staff, and advisory board members must be provided, along with an annually updated charter. The report should be submitted to the Vice Provost with copies to the appropriate dean(s), department chair(s), and the Provost. Annual reports are due no later than June 1 each year.

Active centers and institutes will undergo periodic reviews to ensure ongoing alignment with departmental, college and/or institutional missions and resources, success in accomplishing stated objectives, and sound fiscal status and practices. A center or institute must undergo a major evaluation or review at least once every five (5) years. A major review may occur sooner at the discretion of the Provost. Additional or more frequent major evaluations may be necessary if mandated by the center's charter, bylaws, or funding agency.

The purpose of the self-evaluation is to collect data related to the center's goals and objectives, with specific attention to purpose for establishing the center and the accountability plan. Continuation of the center must be justified in order for the center to continue to operate. The self-study should be organized as follows:

- Mission, goals, and objectives, and their relationship to those of the university.
- Degree to which the center's mission, goals, and activities are unique or duplicated elsewhere on campus.
- Key accomplishments (related to goals and objectives) in the past five years in research, instruction, and/or public service and engagement (publications, external funding, outreach services, university/community partnerships, etc.).
 1. External funding data should include – proposals and awards including sponsor, amount requested, and amount funded, PIs and co-PIs and time period
 2. Include full citations of scholarly work
- How and to what extent the center promotes transdisciplinary work
- The ways in which the center/institute has enhanced the scholarly reputation of NKU. This should include a listing of conferences/workshops hosted, keynote addresses and invited presentations, public service, etc.
- Client feedback as appropriate to the mission of the center or institute
- Organizational structure; number and types of personnel; list of affiliated faculty, their position and roles
- Undergraduate and graduate student involved in center/institute projects including their source of support
- Summary budget data for past five years, including amount and sources of funding, changes in funding over the years, number and types of grants and contracts, and administrative costs (see attached sample template)
- Responsible fiscal oversight as determined by the financial audit and professional evaluation that demonstrate that the center or institute is being managed properly
- Vision for the future of the center or institute for the next five years, including program improvement plans. Include a bulleted list of any issues/challenges affecting the center/institutes ability to achieve its objectives in the coming years.
- List of potential external reviewers

The external reviewers report will include an overview of the strengths and weaknesses of the center/institute and will address the following:

- Degree to which the mission of the program is realistic, feasible, and capable of meeting the needs of the university and wider community
- Extent to which the center's mission, goals, and activities are unique or duplicated elsewhere on campus or within NKU
- Degree of success in achieving mission and reaching desired outcomes; adequacy of programs and initiatives in fulfilling research, instruction, and/or public service missions and meeting the needs of constituents and stakeholders
- Quality of the student experience and success in career placement (if applicable).
- Effectiveness of leadership, organizational structure, and administrative resources.
- Quality of institutional relationships
- Adequacy of funding and facilities
- Feasibility of the program's plans for the future
- Recommendations for improving academic and administrative effectiveness

The steps in the review process are provided below:

- The Vice Provost for Graduate Education, Research and Outreach (VPGERO) provides the dean(s) with a list of centers and institutes under his/her area of responsibility that are scheduled for review in the upcoming year. The VPGERO also provides general guidelines for the review process and the required format for the report.
- The VPGERO discusses goals and expected outcomes of the review process with each dean(s).
- Each center/institute is notified of the upcoming review, reporting requirements, and a deadline for report submission.
- The center/institute submits a draft of the report by the specified deadline to the dean(s) and VPGERO for comment before generating a final report. (Note: requests for more information or revision to the report may occur at any step of the review process.)
- The center/institute submits the final report by the specified deadline to the dean(s) and VPGERO.
- VPGERO will select at least three persons (internal or external) with expertise in the field presented by the center under review to review the report and deliver recommendations to the VPGERO.
- The dean(s), VPGERO and Provost discuss the report and consider what steps should follow the review. These alternatives can include:
 - Continuance without Conditions. A recommendation to continue the center/institute without conditions. The next review would be scheduled in five years.
 - Continuance with Recommended Changes or Actions. A recommendation to continue the center/institute with specific provisions (e.g., specified follow-up actions, abbreviated review period, reorganization, consultant visit, etc.).
 - Discontinuance. A recommendation to discontinue the center/institute.
- The Provost, in consultation with the President, makes the final decision and communicates it to the VPGERO, the dean(s), chair(s) and director.

IX. EXCEPTIONS

Describe when exceptions are allowed, the process by which exceptions are granted, and the title of the university official authorized to grant the exception.

In rare instances and on a case-by-case basis, a non-academic center or institute may be created in a division outside of Academic Affairs as defined by the NKU Organizational chart. Such units require the approval of the President. For more information, please contact the Senior Vice President for Administration and Finance.

XII. REFERENCES AND RELATED MATERIALS

REVISION HISTORY

Indicate any revisions to this policy using the table below. Include the type of revision and the month & year the revision was approved

REVISION TYPE	MONTH/YEAR APPROVED
New Policy	
Choose an item.	
Choose an item.	
Choose an item.	
Choose an item.	
Choose an item.	

Choose an item.

POLICY NAME

APPROVALS

HUMAN RESOURCES REVIEW

SENIOR DIRECTOR, HUMAN RESOURCES

Signature

Date

Lori Southwood

LEGAL & COMPLIANCE CONCURRENT REVIEW

COMPLIANCE OFFICER

Contact Division of Administration & Finance

9/22/2016

Dawn Bell-Gardiner

VICE PRESIDENT FOR LEGAL AFFAIRS/GENERAL COUNSEL, OR ASSOCIATE GENERAL COUNSEL

Contact Division of Administration & Finance

9/22/2016

Printed Name

AAC REVIEW

PROVOST AND EXECUTIVE VICE PRESIDENT FOR ACADEMIC AFFAIRS

Signature

Date

Printed Name

PRE-COMMENT PERIOD EXECUTIVE TEAM REVIEW

PROVOST AND EXECUTIVE VICE PRESIDENT FOR ACADEMIC AFFAIRS

Signature

Date

Printed Name

COMMENT PERIOD

POLICY COORDINATOR

Signature

Date

Justin Duncan

PROFESSIONAL CONCERNS COMMITTEE REVIEW

CHAIR, PROFESSIONAL CONCERNS COMMITTEE

Signature

Date

Ken Katkin

FACULTY SENATE

CHAIR, FACULTY SENATE

Signature

Date

Ken Katkin

FINAL EXECUTIVE TEAM REVIEW

1. ACADEMIC & HYBRID POLICIES

PROVOST AND EXECUTIVE VICE PRESIDENT FOR ACADEMIC AFFAIRS

Signature

Date

Sue Ott Rowlands

2. ALL POLICIES

SENIOR VICE PRESIDENT, ADMINISTRATION & FINANCE

Signature

Date

Sue Hodges Moore

PRESIDENTIAL APPROVAL

PRESIDENT

Signature

Date

PRESIDENT

Geoffrey S. Mearns

BOARD OF REGENTS APPROVAL

BOARD OF REGENTS (IF FORWARDED BY PRESIDENT)

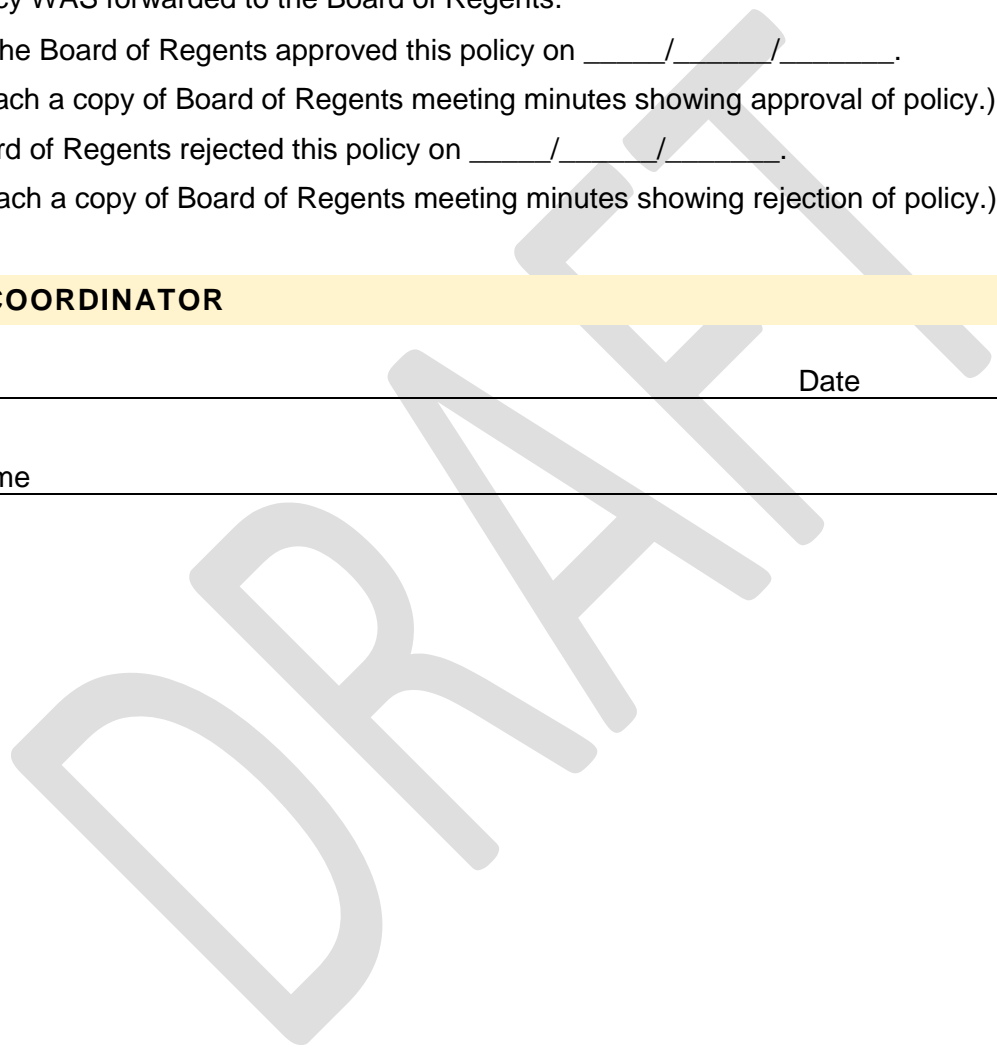
- This policy WAS NOT forwarded to the Board of Regents.
- This policy WAS forwarded to the Board of Regents.
 - The Board of Regents approved this policy on ____/____/____.
(Attach a copy of Board of Regents meeting minutes showing approval of policy.)
 - The Board of Regents rejected this policy on ____/____/____.
(Attach a copy of Board of Regents meeting minutes showing rejection of policy.)

POLICY COORDINATOR

Signature

Date

Printed Name



MEMORANDUM

To: Dr. Samantha Langley, Vice Provost for Graduate Education, Research, & Outreach
From: Professional Concerns Committee
Re: Draft Policy on Establishing, Reviewing, and Discontinuing Academic Centers & Institutes
Cc: Provost Sue Ott Rowlands
Date: Dec 1, 2016

The Professional Concerns Committee (PCC) of the NKU Faculty Senate has reviewed the draft policy proposal entitled “Establishing, Reviewing, and Discontinuing Academic Centers and Institutes.” The PCC now offers the following comments and suggestions on the draft policy.

General Comments

1. The PCC agrees that a comprehensive written policy is needed to govern the establishment, review, and discontinuance of academic centers and institutes. The present proposal would add clarity, which the PCC believes is needed.
2. The PCC was unanimous in its view that the present draft policy proposal, if adopted, will discourage faculty members from initiating new proposals for centers and institutes and from continuing to participate in existing centers and institutes. From a faculty perspective, the proposal imposes new and additional administrative burdens on participation in centers and institutes, without offering corresponding benefits or rewards to faculty members who participate, or to the university as a whole. While the preambular language in Section I speaks of “a commitment of resources,” the sense of many PCC Members was that centers at NKU generally operate with little or no resources, and that this *status quo* is unlikely to change going forward even if performance review procedures are made more burdensome. Accordingly, the sense of the PCC is that this document is a “negative” document, designed to make it harder to initiate centers, easier to close them, and more burdensome for faculty members to operate them.
3. Several PCC Members expressed an understanding that Kentucky state law (or the Council on Post-Secondary Education) requires certain centers and institutes at NKU—including CINSAM—to exist and to remain in existence. If so, then any policy that is adopted may need to provide for separate treatment of such centers and institutes. The PCC has not researched this issue.
4. The PCC also found the bullet-pointed format of the draft document to be unwieldy, and unnecessarily difficult to work with and to comment on. If the draft policy is adopted, the PCC recommends that the document be formatted with shorter numbered paragraphs and with consecutive Section numbers, rather than bullet points. (The current draft jumps from Section IV to Section VII, for example. In the entire draft, only Section VII is subdivided into numbered subsections).

Specific Comments

1. On Page 2, Section IV, first paragraph: In the second sentence, the word “most” should be changed to “normally.” The sentence would now read: “It is expected that **normally** institutes would involve faculty from multiple departments and schools/colleges.”
2. On Page 2, Section IV, first paragraph: In the final sentence, the word “only” should be inserted before the word “offer.” The sentence would now read: “Although centers and institutes do not have primary jurisdiction over academic curricula, they may **only** offer courses in cooperation with academic units.”
3. On Page 2, Section IV, third paragraph: In the only sentence before the bullet-points, the words “identify its primary focus within the university mission” should be replaced with the words “provide activities in one or more of the following areas.” The sentence would now read: “A center or institute will **provide activities in one or more of the following areas**: research, instruction or outreach.”
4. On Page 2, Section IV, third paragraph: In each of the three bullet-pointed sentences, the word “ordinarily” should be inserted after the phrase “center or institute.” The three bullet-points should read as follows:
 - A research center or institute **ordinarily** has research as its primary mission. Although classified as a research center, such a unit may also provide instruction, training, technical assistance, or public service programs. Although such units do not have jurisdiction over academic curricula, they may offer courses in cooperation with academic units.
 - An outreach center or institute **ordinarily** has public service or technical assistance as its primary mission. Research, instruction, and training activities may also be conducted as secondary components of the mission. Although such units do not have jurisdiction over academic curricula, they may offer courses in cooperation with academic units.
 - An instructional center or institute **ordinarily** has training or instruction as its primary mission. These units may also conduct research and public service activities. Although instructional centers and institutes do not have primary jurisdiction over academic curricula, they may offer courses in cooperation with academic units.
5. On Page 2, Section IV, after the bullet points, an additional sentence should be added that reads: “**In appropriate circumstances, a single center or institute may carry more than one of the preceding designations.**” This sentence is necessary to accommodate the continuation of existing hybrid centers, including CINSAM.
6. On Page 3, Section VII.2, under “Establishment of a New Academic Center or Institute,” the policy describes pre-proposal and full proposal stages. The PCC is concerned that the proposer is asked to provide information that s/he does not have. For example, "Description of space, facilities, and equipment needs for the next five years and how those needs will be met" implies that the proposer can control space allocation. Further, how would the proposer know whether necessary funds will be available for a five-year budget? The PCC is concerned that this policy

sets the hurdle too high for faculty and staff who wish to establish a new center. As such, it may discourage innovation.

7. On Page 5, Section VII.4, the draft policy addresses “Termination or Realignment of Academic Centers and Institutes.” The same subject is later addressed on Page 7, Section VIII, in the list of bullet points. It would be helpful if the subject were addressed in one single section or subsection, rather than piecemeal in different parts of the document.
8. On Page 6, Section VIII, in the final bullet point of the first list (i.e. half-way down the page), the words “where appropriate” should be added. The bullet-point would now read: “List of potential external reviewers, **where appropriate.**”
9. On Page 6, Section VIII, in the sentence that follows the final bullet point of the first list, the words “When external review is implemented,” should be inserted at the beginning of the sentence. As amended, the sentence fragment would now read: “**When external review is implemented,** the external reviewer’s report will include an overview of the strengths and weaknesses of the center/institute and will address the following:”
10. On Page 7, Section VIII, following the bullet point on “discontinuance,” a penultimate sentence should be added. It should read: “**In the event that any of the latter three alternatives are recommended, the director and executive team of the center/institute shall have the opportunity to discuss the recommendation with the Provost before further action is taken.**”

CONCLUSION

The PCC is grateful for the opportunity to provide recommendations and suggestions and this proposal, and respectfully submits these comments.

FINANCIAL CONFLICT OF INTEREST DISCLOSURE FOR RESEARCH

POLICY NUMBER: RESERVED FOR FUTURE USE

POLICY TYPE: HYBRID - ACADEMIC/ADMIN

RESPONSIBLE OFFICIAL TITLE: DIRECTOR, OFFICE OF RESEARCH, GRANTS, AND CONTRACTS

RESPONSIBLE OFFICE: OFFICE OF RESEARCH, GRANTS, AND CONTRACTS

EFFECTIVE DATE: 6/27/2016

NEXT REVIEW DATE: N/A

EXPIRATION DATE (FOR INTERIM POLICIES): 1/27/2017

SUPERSEDES POLICY DATED: N/A

REQUIRES LEGAL/COMPLIANCE REVIEW:

(PER SECTION V. OF THE APPROVED POLICY REQUEST FORM) YES NO

REQUIRES I.T. POLICY COUNCIL REVIEW:

(PER SECTION V. OF THE APPROVED POLICY REQUEST FORM) YES NO

REQUIRES PROFESSIONAL CONCERNS COMMITTEE REVIEW:

(PER SECTION V. OF THE APPROVED POLICY REQUEST FORM) YES NO

REQUIRES FACULTY SENATE APPROVAL:

(PER SECTION V. OF THE APPROVED POLICY REQUEST FORM) YES NO

REQUIRES HUMAN RESOURCES REVIEW:

(PER SECTION V. OF THE APPROVED POLICY REQUEST FORM) YES NO

REQUIRES BOARD OF REGENTS APPROVAL:

(PER SECTION V. OF THE APPROVED POLICY REQUEST FORM) YES NO

I. POLICY STATEMENT

Northern Kentucky University has a responsibility to identify, manage, reduce, and/or eliminate research conflicts of interest and/or conflicting financial interests related to research. It is the purpose of this policy to define such conflicts, identify those individuals who must report such conflicts, clarify the potential for such conflicts, and delineate the proper procedures for reviewing and addressing all conflicts of interest. As of August 24, 2012, all institutions accepting federal funding from a grant, cooperative agreement or contract from a Public Health Service (PHS) agency are required to implement and adhere to an Institutional Research Financial Conflict of Interest policy.

II. ENTITIES AFFECTED

This NKU Institutional policy applies to all researchers/Investigators funded by Public Health Services (PHS) and National Science Foundation (NSF) at NKU.

III. AUTHORITY

This policy implements federal requirements pertaining to "Objectivity in Research for which Public Health Service (PHS) Funding is Sought" promulgated by the U.S. Public Health Service, which includes the National Institutes of Health (NIH), and which are published in 42 CFR Part 50 and 45 CFR Part 94. This policy also implements federal requirements contained in the National Science Foundation's (NSF) "Investigator Financial Disclosure Policy".

IV. DEFINITIONS

Among the definitions listed at 42 CFR 50.603 are eight key definitions that you must know in order to understand the Financial Conflict of Interest (FCOI) regulation. They are Institution, Investigator, Institutional Responsibilities, Financial Interest, Financial Conflict of Interest, Manage, and Significant Financial Interest.

Institution refers to any domestic or foreign, public or private, entity or organization (excluding a Federal agency) that is applying for or that receives PHS/NSF and other federal agency research funding.

Institutional Responsibilities means an Investigator's professional responsibilities on behalf of the Institution, and as defined by the Institution, including, but not limited to, activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards.

Investigator as defined by NKU, means the Principal Investigator, Project Director, and any other person, regardless of title or position, who is responsible for or involved in the design, conduct, or reporting of research who are funded by PHS or NSF. This may include collaborators or consultants

Financial Interest means anything of monetary value, whether or not the value is readily ascertainable.

Financial Conflict of Interest (FCOI) means a significant financial interest that could directly and significantly affect the design, conduct, or reporting of research.

Manage means taking action to address a financial conflict of interest, which can include reducing or eliminating the financial conflict of interest, to ensure, to the extent possible, that the design, conduct, and reporting of research will be free from bias.

Significant Financial Interest (SFI) is defined by the regulation as:

A. A financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse and dependent children) that reasonably appears to be related to the Investigator's institutional responsibilities:

1. With regard to any publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;

2. With regard to any non-publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the Investigator (or the Investigator's spouse or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest); or

3. Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.

B. Investigators also must disclose the occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available), related to their institutional responsibilities; provided, however, that this disclosure requirement does not apply to travel that is reimbursed or sponsored by a federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education. The Institution's FCOI policy will specify the details of this disclosure, which will include, at a minimum, the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration. In accordance with the Institution's FCOI policy, the institutional official(s) will determine if further information is needed, including a determination or disclosure of monetary value, in order to determine whether the travel constitutes an FCOI with the PHS-funded research.

A Significant Financial Interest (SFI) of the Investigator's spouse, dependent children, or persons who share financial interests of which could reasonably influence professional responsibilities is required to be included in the initial disclosure prior to submission for funding.

Note: The term significant financial interest does not include the following types of financial interests: salary, royalties, or other remuneration paid by the Institution to the Investigator if the Investigator is currently employed or otherwise appointed by the Institution, including intellectual property rights assigned to the Institution and agreements to share in royalties related to such rights; any ownership interest in the Institution held by the Investigator, if the Institution is a commercial or for-profit organization; income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles; income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education; or income from service on advisory committees or review panels for a federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.

V. RESPONSIBILITIES

Provost and Executive Vice President for Academic Affairs: Institutional Official Responsible for maintaining University compliance.

Director of the Office of Research, Grants and Contracts (RGC), Research Compliance Manager in RGC: Responsible for enforcing NKU research policy procedures to maintain Investigator compliance.

VI. PROCEDURES

Per Federal regulations; all universities accepting federally sponsored research funds must, at a minimum, enforce a University FCOI policy that requires all Investigators, which include *faculty, staff, and students* conducting research to:

- Complete a Financial Conflict of Interest Disclosure form (FCID) at the time of proposal submission, annually, and as Investigator financial situations change.

- Complete required FCOI training in the CITI training database prior to the expenditure of funds and every four years thereafter.
- When necessary: Adhere to reporting requirements should there be a significant financial conflict of interest, with an approved Management Plan.

See the [Northern Kentucky University Office of Research, Grants, and Contracts](#) website for procedures and forms related to this policy.

VII. REPORTING REQUIREMENTS

When a Research Financial Conflict of Interest is deemed “significant”, the Institutional Official shall be responsible for reporting requirements in accordance with each funding agency. Reporting requirements vary with agencies. Typically, reporting requirements include reporting at initial disclosure, and then annually until completion of the project. Additionally, Institutions are required to maintain all Research Financial Conflict of Interest program enforcement data to be available upon request for audit from funding agencies.

VIII. TRAINING

Pursuant to Federal regulations, the Institutional Official or designee, shall inform each Investigator about this regulation and of his/her responsibilities to comply. Prior to engaging in research at NKU, each Investigator shall complete training regarding the disclosure of significant financial interests and the management, reduction or elimination of financial conflicts of interest related to research. Training shall be repeated at least every four years or when (a) this regulation is substantially revised; (b) an Investigator is new to the University; or (c) if an Investigator is determined to not be in compliance with this regulation.

See the [Northern Kentucky University Office of Research, Grants, and Contracts](#) website for specific procedures related to training for this policy.

IX. COMMUNICATIONS

This policy should be communicated to the Provost, all Vice Provosts, all Deans, all Chairs, all faculty, staff, and students who supervise or are directly involved in research or programmatic projects sponsored by outside funders.

X. REFERENCES AND RELATED MATERIALS

REFERENCES & FORMS

See the [Northern Kentucky University Office of Research, Grants, and Contracts](#) website for procedures and forms related to this policy.

RELATED POLICIES

[Department of Health and Human Services “Objectivity in Research for which Public Health Service \(PHS\) Funding is Sought” promulgated by the U.S. Public Health Service 42 CFR Part 50 and 45 CFR Part 94](#)

[National Institutes of Health Financial Conflict of Interest Policy](#)

[National Science Foundation’s \(NSF\) “Investigator Financial Disclosure” Policy](#)

REVISION HISTORY

Indicate any revisions to this policy using the table below. Include the type of revision and the month & year the revision was approved

REVISION TYPE	MONTH/YEAR APPROVED
New Policy	7/2016
Choose an item.	
Choose an item.	
Choose an item.	
Choose an item.	
Choose an item.	
Choose an item.	

DRAFT

FINANCIAL CONFLICT OF INTEREST DISCLOSURE FOR RESEARCH

APPROVALS

1. ACADEMIC & HYBRID POLICIES

PROVOST & EXECUTIVE VICE PRESIDENT FOR ACADEMIC AFFAIRS

Signature

Date

Printed Name

2. ALL POLICIES

SENIOR VICE PRESIDENT FOR ADMINISTRATION & FINANCE

Signature

Date

Printed Name

PRESIDENTIAL APPROVAL

PRESIDENT

Signature

Date

Geoffrey S. Mearns

Printed Name

BOARD OF REGENTS APPROVAL

BOARD OF REGENTS (IF FORWARDED BY PRESIDENT)

- This policy WAS NOT forwarded to the Board of Regents.
- This policy WAS forwarded to the Board of Regents.
 - The Board of Regents approved this policy on ____/____/____.
(Attach a copy of Board of Regents meeting minutes showing approval of policy.)
 - The Board of Regents rejected this policy on ____/____/____.
(Attach a copy of Board of Regents meeting minutes showing rejection of policy.)

POLICY COORDINATOR

Signature

Date

Printed Name

DRAFT