POLICY MANUAL

COMMITTEE FOR SCHOLARSHIP INTEGRITY

CONCORDIA UNIVERSITY WISCONSIN

Adopted February 2013; Updated January 2026

1. INTRODUCTION

1.1. Statement of Purpose.

The Committee for Scholarship Integrity (CSI) will enable Concordia University Wisconsin-Ann Arbor (CUWAA) to offer quality Christian education by fostering a culture of scholarship that adheres to high ethical and legal standards established by the academic community, the nation, and the Church.

1.2. Philosophical, ethical, and theological underpinnings.

1.2.1. CUWAA is a higher education institution that values responsible, ethical conduct in all of its activities. As an institution of higher learning established by the Lutheran Church–Missouri Synod (LCMS), CUWAA is especially cognizant of its moral obligation to ensure that all individuals connected with the university are aware of and adhere to the highest standards for the responsible conduct of research and scholarship. Consequently, CUWAA has established and empowered the CSI to establish policy for responsible scholarly activities on the part of faculty, staff, and students, ensure that all constituents receive training in the ethical conduct of research, and hear cases involving scholarship misconduct if deemed necessary by the Vice President of Academics. While the Institutional Review Board (IRB) oversees research involving human subjects and the Institutional Animal Care and Use Committee (IACUC) is charged to make sure animal research is ethical, the focus of the CSI is that CUWAA faculty, staff, and students conduct all research projects and scholarly activities in an ethical manner. In keeping with the Christian tradition, the policies of CUWAA with respect to research and related scholarly activities are based on the following principles:

1.2.1.1. "So in everything, do to others what you would have them do to you, for this sums up the Law and the Prophets" (Matthew 7:12, NIV).

1.2.1.2. "You shall love your neighbor as yourself" (Matthew 22:39b, ESV).

1.2.1.3. "Do nothing from selfish ambition or conceit, but in humility count others more significant than yourselves. Let each of you look not only to his own interests, but also to the interests of others" (Philippians 2:3-4, ESV).

1.2.1.4. "The heavens declare the glory of God, and the sky above proclaims his handiwork. Day to day pours out speech, and night to night reveals knowledge" (Psalm 19:1-2, ESV).

1.2.1.5. "Whatever you do, work heartily, as for the Lord and not for men, knowing that from the Lord you will receive the inheritance as your reward. You are serving the Lord Christ" (Colossians 3:23-24, ESV).

1.2.2. Expectations of scholars at CUWAA.

Scholars should be committed to the responsible use of scientific tools and methods to seek new knowledge. While the general principles of scientific methodologies and scholarly research are universal, their detailed application may differ in diverse academic disciplines and in varying circumstances. All faculty and staff at CUWAA should maintain exemplary standards of intellectual honesty in formulating, conducting, presenting, and reviewing original research and scholarship, as befits the mission of CUWAA (Adapted from National Institutes of Health, 2007).

1.3. Policy Implementation.

The interpretation and implementation of these policies is the responsibility of the CUWAA Academic Office and the CSI.

1.4. Process.

If scholarship misconduct is uncovered by a faculty or staff member or by a person or organization from outside CUWAA, it shall be brought to the attention of the Vice President of Academics and the Chair of the CSI. The Vice President of Academics (VPA), in consultation with the university President and the Academic Council (if deemed necessary), shall make a determination of how the matter is to be handled. The VPA will determine the facts of the case and decide upon a fitting course of action and/or sanction. Sanctions may include, but are not limited to, retraction of an article or other scholarly work, demotion in rank and/or responsibility, or even dismissal from the university.

In lieu of the former process, the case may be turned over to the CSI if (1) the VPA deems it appropriate, or (2) if the scholar in question disagrees with determinations made by the VPA. After the CSI receives the case, a fact-finding hearing will be held and a final recommendation will be made by the CSI. The CSI's recommendation will go the university President for final action. Members of the CSI may recuse themselves from this process if it is felt that they have a vested interest in the outcome, have a real or perceived conflict of interest, or have strong personal relationships with the stakeholders involved in the case.

1.5. Applicable Definitions.

- **Biosafety** is the reduction or elimination of exposure of laboratory workers or other persons and the outside environment to potentially hazardous agents involved in microbiological or biomedical facility research (Salerno & Koelm, 2002).
- **Biosecurity** is the protection of facilities against the theft or diversion of high-consequence microbial agents, which could be used by someone who maliciously

intends to conduct bioterrorism or pursue biological weapons proliferation (Salerno & Koelm, 2002).

- **Conflict of Interest** occurs when an individual or organization is involved in multiple interests, one of which could possibly corrupt the motivation for an act in another.
- **Data** means recorded factual material, regardless of the form or media on which it may be recorded, that is commonly accepted in the scholarly community as necessary to validate research findings. For example, data may include manuscript drafts, database search results, translations, writings, films, sound recordings, pictorial reproductions, drawings, designs, other graphic representations, procedural manuals, forms, diagrams, work flow charts, equipment descriptions, data files, and statistical records. This broad definition of data may include preliminary analyses, drafts of research papers, other published papers, peer reviews, and communications with colleagues. This definition does not supersede any campus policy pertaining to intellectual property.
- **Misconduct in Research and Scholarship.** Fabrication, falsification, or plagiarism in proposing, performing, or reviewing scholarship, or in reporting research results. This includes oral presentations. Misconduct in scholarship does not include honest errors or differences of opinion. Failure to comply with federal, state, and municipal statutes and regulations governing scholarship is unlawful and may be pursued by CUWAA as a violation of the scientific integrity process (Tufts University Office of the Vice Provost for Research, 2013).
- **Peer Review** is the evaluation of creative work, scholarship, or performance by people with similar or equivalent training and knowledge in order to validate or enhance the quality of the work, scholarship, or performance.
- **Plagiarism** is any misrepresentation in the use of another's work, especially if that misrepresentation gives the impression that the author is presenting his or her own original work.
- **Principal investigator (PI)** means a researcher with primary responsibility for a research project, a definition that applies whether or not the research is sponsored by an external funding source. A PI's responsibility includes both leadership of the scientific/technical aspects and compliance with administrative aspects of the research. The PI is responsible for the stewardship and retention of research data as well as for determinations concerning access to and appropriate use of that data.
- **Research** means a systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge (U.S. Department of Health and Human Services, 2009).
- **Research contributors** are any persons other than a principal investigator who have made substantial intellectual contributions to the conception and design of research, acquisition of data, or analysis and interpretation of data. Contributors may include faculty collaborators, academic staff, visiting scholars, postdoctoral fellows or other trainees, research technicians, and graduate or undergraduate students. In general, persons performing narrow technical or clerical tasks would not qualify as contributors.
- **Scholarship**. According to Boyer (1990, p. 50, 57, and 62) scholarship definitions should be broad, be characterized by "diversity, not uniformity," (p. 57) and

expectations should be individualized to each faculty member. He proposed four forms of scholarship:

1. Scholarship of Discovery: basic research, discovery of new knowledge.
2. Scholarship of Integration: making connections across disciplines or across specialties within a discipline, connecting specialized information with non-specialists, interpreting the findings of discovery.
3. Scholarship of Application: applying knowledge to solve problems of society and individuals, applying problems of society to define a research agenda; rigorous and accountable service that is tied to one's specialty and professional activity.
4. Scholarship of Teaching: scholarly teaching, observing one's own teaching process, collecting feedback, evaluating effectiveness, and innovating to achieve excellence in teaching.

According to Glassick, Huber, and Maeroff (1997), scholarship is defined as much by its process as by its content. Scholarship is a process that involves six elements: clear goals, adequate preparation, appropriate methods, significant results, effective presentation, and reflective critique.

- **Whistleblowing** is the act of revealing wrongdoing within an organization, to the public, or to those in position of authority.

1.6. Sources Cited.

Boyer, E. L. (1990). *Scholarship reconsidered: Priorities of the professoriate*. San Francisco: Jossey-Bass.

Glassick, C. E., Huber, M. T., & Maeroff, G. I. (1997). *Scholarship assessed: Evaluation of the professoriate*. San Francisco: Jossey-Bass.

National Institutes of Health. (2007). *Guidelines for the conduct of research in the intramural research program at NIH* (4th ed.). Washington, D.C.: NIH.

Salerno, R. M., & Koelm, J. G.. (2002). Biological laboratory and transportation security and the biological weapons convention. Albuquerque, NM: Sandia National Laboratories.

Tufts University Office of the Vice Provost for Research. (2013). "Misconduct in research and scholarship. Available online at http://viceprovost.tufts.edu/research-policies/misconduct-in-research-and-scholarship/

U.S. Department of Health and Human Services. (2009). Regulations for the conduct of human subjects research. Title 45 Part 46 of the Code of Federal Regulations. Available from www.hhs.gov.

1.7. Additional Resource.

University of Minnesota Center for Bioethics. (2003). *A guide to research ethics.* Minneapolis, MN: University of Minnesota.

2. COMMITTEE STRUCTURE AND TERMS

The CSI is an administrative committee appointed by the Vice President of Academics (VPA) with representatives from each School of the University (at the discretion of the Dean of each School), and the CUWAA Office of Research and Sponsored Programs. The VPA and the Director of Research and Sponsored Programs serve as *ex officio* members. Ex

officio members have full voting rights. Members from their respective Schools shall be appointed by recommendation of each Dean.

Membership of the CSI includes the following:

CUW School of Arts and Sciences: 3 members
CUW School of Pharmacy: 2 members
CUW School of Health Professions: 1 member
CUW School of Nursing: 1 member
CUW School of Education: 1 member
CUW School of Business: 1 member
CUAA: 1 member

Office of Research and Sponsored Programs: 1 member (*ex officio*)
Vice President of Academics: 1 member (*ex officio*)
Community Member: 1 member (appointed by the VPA)

At least one representative from the School of Arts and Sciences shall be from a humanities field that is generally considered to be non-scientific in nature such as faculty from the Departments of Theology and Philosophy, English, or History. At least one member must be an active, ordained or commissioned, rostered member of the LCMS. An additional community member shall come from outside of CUWAA and will be appointed by the VPA. This member should not have close family members who work or attend classes at CUWAA. Terms shall generally last for three years, renewable for a second term. However, if the VPA believes a specific member has a unique talent set that is valuable to the CSI, these term limits may be waived. The committee shall elect a chair and recording secretary from among its members.

3. EDUCATION GUIDELINES FOR SCHOLARS

The CSI will be responsible for coordinating scholarship training programs at CUWAA. This includes overseeing training in research ethics, compliance, and safety for the university. The committee provides input on the selection of providers or programs for such training.

4. ACADEMIC FREEDOM AND THE MISSION OF CUWAA

4.1. Fundamental Premises.

Individual researchers have the inviolable right to determine the subject matter of their research and are solely responsible for their conclusions. Research methods are subject to limitations where (for example) they might harm human subjects, abuse animals, interfere with the ability of other scholars to conduct their research, or contravene CUWAA policy. The university has an obligation to establish and maintain appropriate policies, procedures, and guidance so that the rights of CUWAA scholars are protected

and responsibilities are met. The university also has the obligation and right to protect its mission as a Christian educational institution.

4.2. Amplification.

CUWAA desires to be a place where open scholarly inquiry is encouraged and valued and wants to carry out its mission of "helping students develop in mind, body, and spirit for service to Christ in the Church and the world." Scholarly activities are valuable components that enable CUWAA to be a participant in the public square; therefore, a bias favoring scholarship will be maintained at CUWAA. The administration and/or the CSI will interfere with the conduct of research only if it is deemed necessary because the investigative team violated accepted standards for the ethical conduct of research or if the research contradicts public doctrinal teachings of the LCMS. According to the LCMS *Concordia University System Institution Policy Manual* (February 2012), "a Concordia faculty member will not actively promote a doctrinal position that is in opposition to the doctrinal position of the LCMS. A Concordia faculty member accepts responsibility for becoming knowledgeable regarding the teachings of the Lutheran Church–Missouri Synod, its Board of University Education, and the institution" (section 9.3.9).

4.3. Doctrinal Principles.

CUWAA, in its public and official identity as a higher-education institution of the Lutheran Church–Missouri Synod, is committed to certain principles of the moral, intellectual, and religious order. Its policies and programs must, in fidelity to its purpose, conform to these principles. Although the fundamental principles are, for the most part, universally understood and need no explicit mention, in matters of possible ambiguity a clarification is in order.

4.3.1. Regarding abortion, the LCMS has affirmed "the sanctity of human life at every stage of its development" (LCMS, 2010, p. 1). The LCMS in Convention has held "firmly to the clear Biblical truth that . . . the living but unborn are persons in the sight of God from the time of conception (Job 10:9-11; Ps. 51:5; 139:13-17; Jer. 1:5; Luke 1:41-44)" (p. 1).

4.3.2. The LCMS views contraceptive measures that work by preventing implantation of human embryos as equivalent to abortion (LCMS, 2010, p. 5).

4.3.3. The Synod has declared its opposition to stem cell research that involves the destruction of human embryos. The Synod does not stand opposed to 'all stem cell research,' for there are 'other sources of stem cells that do not involve the destruction of life' as efforts are made to treat human disease by their use (2001 Res. 6-13)" (LCMS, 2010, p. 51).

4.3.4. The LCMS has not taken an official stance on in vitro fertilization. However, the following practices have been affirmed in several synodical reports: (1) only the sperm and the egg of a man and woman united in marriage may be

employed, (2) surrogate mothers should not be used, and (3) all fertilized eggs must be returned to the uterus of the woman (LCMS, 2010, p. 30).

4.3.5. The Commission on Theology and Church Relations of the LCMS concluded in a 2002 report: "Cloning is fundamentally unacceptable because only one person's bodily life provides the genetic instructions; the delicate balance of marriage is once again disturbed. . . . In short, cloning human beings is a fundamental assault on the created order of God" (LCMS, 2010, p. 12).

4.3.6. In 2004, Resolution 2-08A, the LCMS in Convention affirmed that "the Scriptures teach that God is the creator of all that exists and is therefore the Author and Giver of Life." [Heb. 11: 3; 2 Peter 3: 5-6; 1 Tim. 6: 20-21]

4.3.7. The LCMS in Convention (its highest authority) has voiced its opposition to physician-assisted suicide and euthanasia (LCMS, 2010, pp. 4 and 20). The LCMS Commission on Theology and Church Relations, in a 1993 report entitled *Christian Care at Life's End,* states, "Each person, no matter how infirm and socially useless he or she may appear to be, deserves to be accepted as a being created in the image of God" (LCMS, 2010, p. 7).

4.3.8. The LCMS in Convention has affirmed that "the Scriptures clearly teach that the sexual expression of love is to be in a marriage relationship between one man and one woman (Heb. 13:4; the Sixth Commandment; *Luther's Small Catechism*, pp. 79-82)" (LCMS, 2010, p. 13).

4.4. Right of Clarification.

If proposed research might potentially involve any of the areas delineated in the previous section, investigators have the right to make requests for clarification to the CSI and/or the VPA. The CUWAA Board of Regents (BOR), as the governing body of CUWAA, has the authority to make final determinations about whether or not any scholarship is compatible with the mission of CUWAA. If a consensus about the legitimacy of scholarly activity cannot be made, scholars and CUWAA administrators may appeal to this highest authority.

4.5. Sources Cited.

Concordia University System of the Lutheran Church–Missouri Synod. (2017). *Institution Policy Manual*, section 9.3.9.

Lutheran Church–Missouri Synod. (2010). *This we believe: Selected topics of faith and practice in the Lutheran Church–Missouri Synod.* St. Louis: Concordia Publishing House.

4.6. Additional Resources.

Commission on Theology and Church Relations of the Lutheran Church–Missouri Synod. (1981). *Human sexuality: A theological perspective*. St. Louis, MO: Concordia Publishing House.

———. (1984). *Abortion in perspective*. St. Louis, MO: Concordia Publishing House.

———. (1993). *Christian care at life's end.* St. Louis, MO: Concordia Publishing House.
———. (1996). *Christians and procreative choices: How do God's chosen choose?* St. Louis, MO: Concordia Publishing House.
———. (2002). *What child is this? Marriage, family, and human cloning.* St. Louis, MO: Concordia Publishing House.
———. (2005). *Christian faith and human beginnings: Christian care and pre-implantation human life.* St. Louis, MO: Concordia Publishing House.
———. (2012). *Response to* human sexuality: Gift and trust. St. Louis, MO: Concordia Publishing House.

5. PLAGIARISM AND SCHOLARSHIP MISCONDUCT

5.1. Scholarship misconduct includes, but is not limited to, plagiarism, data fabrication, redundant or duplicate publications without due credit, ghost authorship, AI authorship, and undisclosed conflicts of interest. Generally, plagiarism is any misrepresentation in the use of another's work, especially if that misrepresentation gives the impression that researchers are presenting their original work. Plagiarism can involve the use of exact words, phrases, or sentences of another person's work without quotation marks and proper documentation. Plagiarism may also involve the use of paraphrasing in which a researcher makes a composite of borrowed phrases, ideas, or sentences without proper documentation (see CUWAA Graduate and Student Handbooks).

5.2. Confirmed plagiarism may result in corrections, retractions, or expressions of concern by the peer-reviewed journal or book publisher. Plagiarism may also result in verbal criticism, a written letter of reprimand outlining the misconduct placed in the researcher's file, loss of leadership roles within the university (e.g., Chair of a Department), decrease in academic rank, or dismissal from the university. In addition, third parties suffering loss as a result of plagiarism have the right to ask for redress in civil court.

5.3. If scholarship misconduct disputes arise at CUWAA, initial determinations should first be made by the Dean of the School of the principal or corresponding author. If the Dean thinks the charge has merit, that administrator will notify the VPA and the CSI. If scholarship misconduct allegations involve the Dean, the VPA will automatically review the case. If the Dean dismisses the charges, the person or persons making the allegation may appeal to the VPA. Thereafter, process will be followed as outlined in section 1.4 of this policy. If the VPA turns a case over to the CSI for investigation, the CSI will conduct a formal hearing to include the defendant(s), the person(s) making the allegation, the Dean of the School of the principal or corresponding author, and the VPA or a representative. After a careful discovery of facts, and if the CSI finds the researcher guilty of misconduct, notifications will be made to the appropriate journal or publisher so that possible corrections or retractions can be made and to the Academic Council and the university President for possible academic sanctions.

5.4. Individuals must be aware of the journal, publisher, or conference policies related to generative AI when submitting manuscripts or proposals for review. Guidance from prominent agencies is linked below for convenience.

- **National Institutes of Health**: guidance may be found here.
- **National Science Foundation**: guidance is here.

6. OWNERSHIP, AUTHORSHIP, CREDIT, AND RESPONSIBILITY

6.1. The CSI will adhere to the current policies established by the International Committee of Medical Journal Editors (ICMJE) with regard to authorship of and contributions to all published articles generated by CUWAA faculty and/or staff. The document *Uniform Requirements for Manuscripts Submitted to Biomedical Journals: Writing and Editing for Biomedical Publication*, states, "An 'author' is generally considered to be someone who has made *substantive* intellectual contributions to a published study" (emphasis added; see https://www.icmje.org/recommendations/browse/roles-and-responsibilities/defining-the-role-of-authors-and-contributors.html). This definition applies to scholarship in all academic and professional disciplines. Policies and practices regarding ownership of data are addressed in the CUWAA Intellectual Property policy.

6.2. The *Uniform Requirements for Manuscripts document* goes on to state that "*an author must take responsibility for at least one component of the work, should be able to identify who is responsible for each other component, and should ideally be confident in their co-authors' ability and integrity"* (emphasis theirs). Many peer-reviewed journals require researchers to state specifically how each author was responsible for the completed work, and hold all authors accountable for the integrity of the entire work.

6.3. The ICMJE recommends the following criteria for authorship: Credit should be based on (1) substantial contributions to conception and design, acquisition of data, or analysis and interpretation of data; (2) drafting the article or revising it critically; and (3) final approval of the version to be published. Individuals should meet all three conditions to be considered as authors.

6.4. The following points serve as clarification of the guidelines offered above:

6.4.1. Acquisition of funding, collection of data, or general supervision of the research group alone does not constitute authorship.

6.4.2. All persons designated as authors should qualify for authorship, and all those who qualify should be listed.

6.4.3. Each author should have participated sufficiently in the work to take public responsibility for appropriate portions of the content.

6.4.4. Those contributors who do not meet the criteria for authorship should be listed in the acknowledgements section. Examples of those who might be acknowledged as a contributor include a person who provided merely technical

help, writing assistance, or a departmental chairperson who provided only general support. Financial and material help should also be acknowledged.

6.4.5. In multicenter trials, all members of the group who are named as authors or contributors should fully meet the above criteria for authorship or contributorship.

6.4.6. Decisions about who will be designated as authors or contributors should be made before submitting the manuscript for publication. The principal or corresponding author should be prepared to explain the presence and order of these individuals.

6.5. If authorship disputes arise at CUWAA, the involved parties can present their case in writing to the Dean of the school of the principal or corresponding author. If either author disagrees with the Dean's decision, they can appeal to the CSI in writing within 10 days of the dean's decision. The CSI will review the case and respond in writing within 10 working days of receipt of the appeal. In the event that a Dean is involved in an authorship dispute, the CSI shall make the determination. The CSI decision shall be final.

6.6. Source Cited.

International Committee of Medical Journal Editors. (2010). *Uniform requirements for manuscripts submitted to biomedical journals: Writing and editing for biomedical publication.* Available from www.icmje.org.

7. CONFLICTS OF INTEREST

7.1. CUWAA defines conflict of interest as described by the National Institutes of Health (NIH) Ethics Program. A "conflict of interest" arises when employees are involved in a particular matter as part of their official duties with an outside organization with which they also have a financial interest, or one which is imputed to them, i.e., an employee's (1) spouse, (2) minor children, (3) general partner, (4) an organization in which an employee also serves as an officer, director, trustee, partner, or employee, or (5) a person or organization with which the employee is negotiating for prospective or has an arrangement for prospective employment. Conflicts can be real or apparent. Conflicts of interest do not necessarily infer research misconduct. Conflicts of interest may also be related to personal associations or involvements or leadership positions related to one's professional role that may pose a conflict with CUWAA. Potential conflicts of interest can involve finances, career advancement, publishing bias (e.g., desire to see a "significant difference" between groups), and the vested interests of an institution in obtaining certain research results.

7.2. In all matters involving conflicts of interest at CUWAA, the Lutheran Church–Missouri Synod Conflict of Interest Policy, which is available from Human Resources, shall supersede any other policies drafted by the CSI, Schools, or Departments. The LCMS policy pertains to "the acceptance of gifts, entertainment, or favors from any individual or

outside concern which does or is seeking to do business with the Synod or the agencies of the Synod." Federal and state laws and professional policies concerning conflict of interests may also apply.

7.3. Source Cited.

National Institutes of Health. (2012). Conflict of interest information resource page. Available at https://grants.nih.gov/policy-and-compliance/policy-topics/fcoi.

7.4. Additional Resource.

Stelfox, H.T., Chua G., O'Rourke K., & Detsky, A.S. (1998). Conflict of interest in the debate over calcium-channel antagonists. *New England Journal of Medicine* 338 (2), 101-106.

8. DATA COLLECTION AND MANAGEMENT

8.1. Appropriate Data Gathering, Storage, and Retention.

A common denominator in most cases of alleged scientific misconduct has been the absence of a complete set of verifiable data. The retention of accurately recorded and retrievable results is essential for the progress of scientific inquiry. Scholars must have access to their original results in order to respond to questions including, but not limited to, those that may arise without any implication of impropriety. Moreover, errors may be mistaken for misconduct when the primary experimental results are unavailable.

8.2. Purpose.

This section establishes CUWAA policy to assure that research data are appropriately maintained, archived for a reasonable period of time, and available for review and use under the appropriate circumstances. This policy pertains to both primary and secondary data. Primary data means data generated by research and scholarship conducted at CUWAA, under the auspices of the university, or with university resources. Secondary data means data owned and or generated by another party, data collected from administrative records, or data designated for public use, but used in whole or in part for scholarship conducted at CUWAA, under the auspices of the university, or with university resources.

8.3. Scope.

This policy shall apply to all CUWAA faculty, academic staff, visiting scholars, postdoctoral fellows or other trainees, research technicians, and graduate or undergraduate students and any other persons at CUWAA involved in the design, conduct or reporting of research and scholarship at or under the auspices of CUWAA, and it shall apply to all scholarly projects on which those individuals work, regardless of the source of funding for the project.

8.4. Policies.

8.4.1. Original research results should be promptly recorded, and should be kept in as organized and accessible a fashion as possible. Principal Investigators (PIs)

should adopt an orderly system of data organization, access, and retention and should communicate the chosen system to all members of a research group and to the appropriate administrative personnel, where applicable. Particularly for long-term research projects, PIs should establish and maintain procedures for the protection of essential records in the event of a natural disaster or other emergency.

8.4.2. The PI should retain or archive the raw research data pertinent to publication for a reasonable period of seven years after publication. In no instance should primary data be destroyed while questions may be raised which are answerable only by reference to such data.

8.4.3. CUWAA must retain research data in sufficient detail and for a period of seven years to enable appropriate responses to questions about accuracy, authenticity, primacy and compliance with laws and regulations governing the conduct of the research. It is the responsibility of the PI to determine what needs to be retained under this policy.

8.4.4. Research data must be archived for a minimum of seven years after the final project close-out, with original data retained wherever possible. Principles of good stewardship would justify longer periods of retention in the following cases:

1. Data must be kept for as long as may be necessary to protect any intellectual property resulting from the work;
2. If any charges regarding the research arise, such as allegations of scientific misconduct or conflict of interest, data must be retained until such charges are fully resolved; and;
3. If a postdoctoral scholar or other trainee, graduate student, or undergraduate student is a research contributor, data must be retained at least until the degree is awarded, training is completed, or it is clear that the individual has abandoned the work.

8.4.5. Documentation of required approvals of the IRB, IBC, and IACUC should be retained in the PI's files for a period of seven years.

8.4.6. Beyond the periods of retention specified here, the disposal of the research record is at the discretion of the PI and his or her department or work unit (e.g., laboratory). As a practical matter, data may be translated to more efficient storage media as long as the essential nature of the data is not lost. For example, lab notebooks may be scanned, audio recordings transcribed, questionnaires coded and digitized, and the like.

8.4.7. Records will normally be retained in the unit where they are produced. Research records must be retained on the CUWAA campus, or in facilities under the auspices of CUWAA, unless specific permission to do otherwise is granted by the Office of Research and Sponsored Programs

8.4.8. Where necessary to assure needed and appropriate access, the PI, upon request of the university, must provide the university with research data. Under extraordinary circumstances, such as research misconduct, CUWAA will take all necessary steps to ensure integrity of the data.

8.4.9. In the event researchers leave CUWAA or move to a different research group or position at CUWAA, they may, with PI approval, take copies of research data that they have generated or to which they have made a substantial contribution for projects on which they have worked. Original data, however, must be retained at CUWAA by the PI.

8.4.10. If a PI leaves CUWAA and a project is to be moved to another institution, the data may be transferred with the approval of the VPA and with written agreement from the PI's new institution that guarantees: (1) its acceptance of custodial responsibilities for the data, and (2) CUWAA access to the data should that become necessary.

9. PEER REVIEW FOR SCHOLARSHIP

9.1. Academic peer review assesses both quality and importance of scholarly or creative projects. Peer review as it pertains to this section includes evaluation of articles submitted for publication, evaluation of book proposals and book chapters, evaluation of grant applications, juried art exhibits, invited presentations, performances and publications, and accreditation reviews.

9.2. Conduct of Peer Review.

Scholarly peer review will take various forms, depending on the nature of the work. Peer review should be as independent and unbiased as possible.

9.2.1. Anonymous Peer Review.

When peer review is done for the purpose of scholarship dissemination, that peer review should be conducted anonymously by people who do not have a conflict of interest regarding the material being reviewed. Ideally, neither reviewer nor scholar will know the identity of the other. University faculty or staff members may serve as peer reviewers for work performed or created by other CUWAA faculty or staff only when the material under review is presented anonymously and when there is no conflict of interest. University faculty and staff may serve as reviewers for CUWAA students engaged in scholarship (students are not considered to be peers of faculty members). However, a faculty member may not be a reviewer for a student project being reviewed for journal publication in which that faculty member is serving as the project's advisor or mentor.

9.2.2. Non-Anonymous Peer Review.

Some scholarship is not anonymously reviewed (for example, an invited journal article or a commissioned work). In these cases, peer review should still strive to

be independent and unbiased. The scholar should make every effort to ensure that (1) anonymous peer review does occur if feasible and (2) if anonymous review is not achievable, that any peer review process is as unbiased and free from conflict of interest as possible.

9.2.3. Confidentiality in Peer Review.
Peer reviewers may not use an idea or information contained in a grant proposal or an unpublished manuscript before it becomes publicly available, discuss grant proposals or manuscripts under review with colleagues, or retain a copy of the reviewed material.

9.3. Sources Cited.

International Committee of Medical Journal Editors. (2025). *Recommendations.* Retrieved from https://www.icmje.org/recommendations/.

National Institute of Health. (2025) *Integrity and Confidentiality in NIH Peer Review*. Retrieved from https://grants.nih.gov/policy-and-compliance/policy-topics/research-integrity/confidentiality-peer-review.

10. MENTOR/MENTEE RELATIONSHIPS

10.1. Background and Discussion. CUWAA's intellectual property policy describes appropriate relationships between mentors and mentees. The relationship between a mentor and mentee is extremely important for the success and career advancement of both parties. It is therefore very important that both members of the relationship act in ways that are mutually beneficial. This relationship carries with it an imbalance of power; the advisor, as an expert in a particular field, has great influence over the career trajectory of the relatively inexperienced mentee, and thus has a fiduciary responsibility to act ethically with respect to this imbalance of power.

10.2. It is important for mentors and mentees to understand that best practices exist for mentor/mentee relationships. The National Institutes of Health Office of Research Integrity (NIH ORI) collects helpful resources that can be found here: ori.hhs.gov/mentorship. Some key points:

10.2.1. Open communication between mentor and mentee. Problems may arise if mentors or mentees are not candid about research expectations. Clearly stating expected goals and outcomes allows mentors and mentees to understand the needs and desires of both sides.

10.2.2. Fostering a culture of mutual respect. As the party with the most power, mentors are expected to be cognizant of the stresses and deadlines facing their mentees; similarly, mentees should respect the various commitments of mentors, and should work to balance their own research interests with those of their mentor.

10.2.3. Training and support for mentors and mentees. Both parties can benefit from having resources available for training prior to engaging in a mentoring relationship, as well as for conflicts that may arise during a relationship.

10.3. Recommendations.

Following these general guidelines, as well as the list of best practices, will minimize deception and exploitation that can arise from a mentor/mentee relationship. It will be important for mentors and mentees to have established protocols for dealing with potential cases of ethical misconduct in mentoring. A simple contract between mentors and mentees, such as a memorandum of understanding (MOU), may aid in generating open communication. Graduate research practices differ greatly between fields; for example, graduate students in scientific disciplines typically work on research projects conceived by their advisors, whereas this is not necessarily the case in humanities fields. Therefore, it is best to have individual departments determine their specific needs; however, the CSI can serve as a resource to help guide development of mentoring protocols and offer additional training and guidance regarding potential mentoring conflicts.

10.4. Source Cited.

Columbia University Responsible and Ethical Conduct of Research:
https://research.columbia.edu/responsible-and-ethical-conduct-research

11. WHISTLEBLOWING

11.1. Description.

Whistleblowing is the act of revealing wrongdoing within an organization, to the public, or to those in position of authority. Acting in good faith implies integrity and reasonable belief that the information disclosed indicates a violation or case of misconduct. Retaliation is taking an adverse action against an individual because of the individual's good faith participation in the protected activity of reporting suspected misconduct. This whistleblowing policy is intended to enable employees to raise serious concerns in good faith within CUWAA without fear of retaliation.

11.2. Commitment to Honest and Lawful Conduct**.**

The university is committed to conducting its affairs honestly, with integrity, and in accordance with federal, state, and local laws and regulations and CUWAA policy. The university strives to prevent, detect, and swiftly correct violations of law or policy, which may result from inadvertence, mistake, lack of information, or, on a rare occasion, deliberate misconduct.

11.3. Reporting Concerns of Misconduct**.**

University employees, contractors and agents are expected to report good faith concerns about possible violation of any policy, law, rule, or regulation governing any university activity. Employees are encouraged to attempt to resolve their

concerns at the most local level, by reporting their concerns to their supervisor or other appropriate contact person within their unit. If employees feel uncomfortable addressing their concerns at the local level, or wish for any other reason to address their concerns elsewhere, employees may make their reports directly to CUWAA offices responsible for handling the subject area.

Individuals also are encouraged to report any good faith concerns to the CUWAA's confidential reporting service. Reports will be directed to appropriate CUWAA administrators for resolution and investigation, as appropriate. CUWAA maintains a confidential system for reporting scholarship misconduct established by the CSI. Section 4.7 of the *CUWAA Employee Handbook* outlines the university's current Whistleblower Policy as follows, "CU has a responsibility to conduct its affairs ethically and in compliance with the law. Employees who suspect that CU or a particular CU employee is engaged in conduct that violates any law or any of CU's policies should report such conduct to the Human Resources Department. Employees who make such reports in good faith will not be subjected to retaliation of any kind, but failure to make such a report could lead to disciplinary action, up to and including termination."

11.4. Investigation and Resolution.

All employees, contractors and agents of CUWAA are expected to be truthful and cooperative in the university's investigation of allegations. Appropriate CUWAA officials will promptly address all good faith reported concerns. Reports of misconduct will be kept confidential to the extent possible, consistent with the need to conduct an appropriate investigation. Those officials will keep the President and the Board of Regents appropriately informed of any potential serious or widespread legal violations, significant accounting misconduct, or other matters that in their judgment represent a significant compliance concern.

11.5. Protection from Retaliation.

Retaliation against employees for making good faith reports is prohibited. Employees making good faith reports of suspected misconduct should feel safe and protected from retaliation; and will not be subjected to retaliation of any kind. The university will provide appropriate support to reporting employees to protect against retaliation and respond to concerns of retaliation or unfair treatment linked to the employee's reporting. However, failure to make necessary, good faith reports of misconduct of any kind could lead to disciplinary action, up to and including termination. Furthermore, unsubstantiated reports found to be malicious or intentionally dishonest will also be considered a disciplinary offense.

11.6. Additional Resources:

Concordia University Chicago. Whistleblower Policy. Available at: https://www.cuchicago.edu/globalassets/media-files-master/documents-and-

images/about-us/consumer-information/cuc-whistle-blower-policy.pdf Accessed April 3, 2023

Marquette University. Marquette University Reporting Hotline. Available at: https://secure.ethicspoint.com/domain/media/en/gui/13821/index.html. Accessed August 15, 2012.

Phone conversation with Peter Crosby, National Account Manager for Navex Global (866-297-0224 x1103). July 16, 2012.

12. **BIOSECURITY**

12.1. The term 'biosecurity' has multiple definitions when applied to different industries, e.g., animal, food, agriculture, and laboratory research. Many organizations and universities use the terms biosecurity and laboratory biosafety interchangeably. However, it is best to consider biosecurity and biosafety as separate but related concepts. Thus, biosafety is defined as programs and/or procedures that reduce or eliminate exposure of individuals or the environment to potentially hazardous biological agents, and is characterized by well-established lab protocols. Biosecurity is defined as the prevention of loss, theft, or intentional harmful use of potentially hazardous biological agents and is characterized by limiting access to facilities, materials, and information.

12.2. Guidance.

Section VI of the reference work *Biosafety in Microbiological and Biomedical Laboratories* (BMBL) details the performance of a risk assessment for determining whether a biosecurity program is necessary and the form it should take. The *National Institutes of Health Guidelines for Researc*h lists the various microbial agents and recombinant molecules targeted for biosecurity measures and the proper handling and storage of potentially hazardous agents with dual use. Forms for reporting incidents involving such agents are available. The National Science Advisory Board for Biosecurity (NSABB) "provides advice and guidance to the federal government regarding biological research yielding information and technologies with the potential to be misused to pose a biologic threat to public health or national security (i.e., dual use research)." In addition, the NSABB provides guidance on "developing a code of conduct for scientists and laboratory workers that can be adopted by federal agencies, as well as professional organizations and institutions conducting life science research." Currently, the NSABB recommends institutions adopt the NIH guidelines, which are provided on its website. The determination of whether and when a biosecurity program is appropriate and necessary for CUWAA will be made by the VPA in consultation with the CSI and relevant academic departments and schools.

CUWAA has two policies pertaining to aspects of biosafety: the "Chemical Hygiene Plan" and the "Hazardous and Infectious Waste Management policy." Those documents should be consulted first if a question about biosafety arises.

12.3. Developing a Biosecurity Program.

In the event biological materials used in CUWAA student and/or research laboratories are categorized as hazardous to individual human health and/or hazardous to the environment or community-at-large, as defined in the *NIH Guidelines for Research* (12.4), a risk assessment procedure will be performed. In accordance with steps detailed in the BMBL (Chosewood and Wilson, 2009), the biological materials will be identified and prioritized in terms of threat and proper security measures developed to protect them from misuse. A risk management program will periodically review these measures and ensure proper training in the use and security procedures for the biological materials to all CUWAA students, faculty, and staff who might have access to, or come in contact with, hazardous biological materials. Should an improper exposure or loss of a hazardous biological material occur, the incident will be reported using forms developed by the NIH for reporting incidents involving hazardous biological materials.

12.4. Sources Cited.

Chosewood, L. C., & Wilson, D. E., eds. (2009). *Biosafety in microbiological and biomedical laboratories* (5th ed.). Washington, D.C.: CDC, Public Health Service.

National Institutes of Health. (2011, October). *NIH guidelines for research involving recombinant DNA molecules*. Washington, D.C.: Department of Health and Human Services, Office of Biotechnology Activities. Available at https://osp.od.nih.gov/wp-content/uploads/NIH_Guidelines.pdf. Accessed December 12, 2025.

National Science Advisory Board for Biosecurity (NSABB), National Institutes of Health, Office of Biotechnology Activities, Bethesda, MD. https://osp.od.nih.gov/policies/national-science-advisory-board-for-biosecurity-nsabb/

12.5. Additional Resources.

Applied Biosafety: *Journal of the American Biological Safety Association*. https://absa.org/apb/. Accessed December 12, 2025.

Clevestig, P. (2009). *Handbook of applied biosecurity for life science laboratories*. Stockholm, Sweden: Elanders, Stockholm International Peace Research Institute.

Committee on Advances in Technology and the Prevention of Their Application to Next Generation Biowarfare Threats and National Research Council. (2006). *Globalization, biosecurity and the future of life sciences*. Washington, D. C.: National Academies Press.

Fidler, D., & Gostin, L. (2007). *Biosecurity in the global age: Biological weapons, public health, and the rule of law.* Stanford, CA.: Stanford Law and Politics.

Katsuhisa Furukawa, K., Revill, J., Dando, M., & van der Bruggen, K. (2009). *Biosecurity: Origins, transformations and practices (New security challenges).* New York: Palgrave MacMillan.

Lakoff, A., & Collier, S. J. (2008). *Biosecurity interventions: Global health and security in question.* New York: Columbia University Press.

Nordman, B. D. (2010). Issues in biosecurity and biosafety. *International Journal of Antimicrobial Agents,* 36, S66-S69. Accessed, August 19, 2012.

Ryan, J., & Glarum, J. (2008). *Biosecurity and bioterrorism: containing and preventing biological threats*. Burlington, MA: Elsevier.

Salerno, R. M., & Gaudioso, J. (2007). *Laboratory biosecurity handbook*. New York: CRC Press.

World Health Organization. (2024). *Biorisk management: Laboratory biosecurity guidance*. Available at https://www.who.int/publications/i/item/9789240095113.