



UNIVERSITY OF MIAMI POLICY AND PROCEDURE MANUAL

TITLE:	Nepotism in Research	REFERENCE:	New
CATEGORY:	Office of Research Administration	PAGE:	1 of 2
		SUPERSEDES:	New
APPROVER:	Barbara A. Cole Associate Vice President Office of Research Administration	VERSION:	Revised
		EFFECTIVE:	February 2, 2017

PURPOSE:

The purpose of this policy is to identify how the Nepotism Policy applies to sponsored activities in accordance with 2 CFR 200, Federal and State regulations, as well as sponsor terms and conditions.

Failure to comply with UM's policies and procedures may result in audit findings, suspension of sponsored activities, closer monitoring by the sponsor, delays in final payments, and/or other enforcement actions imposed by the sponsor. This policy applies to all Federal and non-Federal sponsored activities, including all externally funded clinical trials.

SCOPE:

All UM personnel must be aware of the complex and detailed rules provided under Federal and non-Federal regulations as well as the terms and conditions of the individual sponsored activity. While compliance with all applicable requirements is essential, it is equally important to maintain an open research environment that welcomes the participation of researchers from around the world as part of UM's mission. To maintain this balance, UM personnel must be familiar with this policy in addition to the Federal and non-Federal regulations on restricted sponsored activities.

This policy applies to all UM personnel, namely:

- Faculty, including voluntary faculty.
- Faculty emeriti engaged as active researchers on UM research activities.
- Researchers, including research staff, postdoctoral fellows, and research associates.
- Graduate students, undergraduate students, and interns involved in research programs.
- Staff in departments, centers, institutes, and administrative offices charged with responsibilities under this policy.
- Consultants, agents, and volunteers associated with research and scholarly activities, as well as in departments and offices charged with responsibilities under this policy.

POLICY:

It is the policy of the University of Miami that the basic criteria for inclusion in a sponsored proposal/award shall be appropriate qualifications and performance. Close personal relationships, whether through family, marriage, or other basis, shall constitute neither an advantage nor a deterrent for inclusion provided the individual meets and fulfills the appropriate University standards.

The University recognizes that close personal relationships may create, or be perceived as creating, a conflict of interest that undermines objectivity. Others may perceive that the relationship creates favoritism. There is a risk of exploitation and coercion.

The University wishes to preserve and further institutional integrity, ethical conduct, and public confidence and trust in all academic research pursuits. Therefore, when a sponsored proposal is under development, the Principal Investigator/s must assess whether the individuals anticipated to be involved in the conduct of research have close personal relationships. If any exist, a Nepotism Memo is required disclosing the individuals involved and identifying how these individuals will be managed to ensure a preservation of institutional integrity, ethical conduct and objectivity.

If, in the post-award period, an individual having a personal relationship with another member of the research team becomes involved in the conduct of the research, a Nepotism memo of the type specified in the paragraph above must be sent to the Vice Provost for Research for approval.

Application/Proposal Packages citing the close personal relationship and including a Nepotism Memo must be approved by the PI, department chair or designee, and submitted to ORA in advance of the final application. ORA will then obtain disposition:

- For Gables/RSMAS Proposals - Vice Provost for Research
- For Medical Proposals - Executive Dean for Research and Vice Provost for Research

DEFINITIONS:

Please refer to UM's ORA website for a list of acronyms and terms commonly used in sponsored/ research administration grants, contracts, and cooperative agreements:

<http://ora.miami.edu/assets/pdf/ora-policies/glossary.pdf>

PROCEDURE:

UM personnel are to use [UM's ORA website](#) for guidance on matters pertaining to sponsored activities.

UM personnel are to follow the Standard Operating Procedures (SOP) outlined, as well as utilize the various required forms and templates that have been implemented for the activities related to this policy.

UM personnel should contact the Pre or Post Award staff for consultation if additional information is needed. Contact information can be found on [UM's ORA Contacts Webpage](#).