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DRAFT (III)

Report of the Committee on

Professional Values and Research Integrity

I. Introduction

Two years ago, Dean Graham Allison established a Committee to begin work on defining the "core values" of the Kennedy School. The Committee was chaired by Professor Dennis Thompson. It understood its task to be not only defining the core values, but also setting an agenda for future work by other committees, and stimulating other activities within the school that would help these core values become an intrinsic part of the school's culture. It was a challenging assignment.

The committee responded by issuing a report that identified nine key issues for the faculty to address:
1) Conflicts of Interest

2) Research

3) Secrecy

4) Fundraising

5) Curriculum

6) Sexism and Racism

7) Personal Conduct

8) Free Speech and Protest

9) Governance

In addition, specific committee members assumed the responsibility for submitting reports on these particular issues. These documents included the following:

1) Dutch Leonard, Memorandum to the KSG Faculty Regarding Conflicts of Interest, April 22, 1988
2) Bill Hogan, Memorandum to the KSG Faculty

These reports (including some fictional cases developed to facilitate the discussion of conflicts of interest and conflicts of commitment) were discussed at several school-wide faculty meetings in the Spring of 1988.

To continue this work, in the Spring of 1990 Dean Robert Putnam established a Committee on Professional Values and Research Integrity. It was to be chaired by Professor Mark H. Moore, and included many veterans of the Thompson Committee including Thompson, Moore, Cavanagh, Hogan, Leonard, Reich. In addition, Marvin Kalb and Olivia Golden joined the Committee. David Ellwood, as the Chairman of the School's Research Committee was added as an ex Officio member.

This Committee was charged more narrowly than the original Thompson Committee. Its job was to consider in detail what specific rules and procedures might be adopted to deal with conflicts of interest and commitments between the Kennedy School and its faculty and senior staff, and with threats to the independence, objectivity, and quality of its outside sponsored research. Even more specifically, the task was to review the KSG Faculty's existing rules in
these areas (modelled after rules adopted by Harvard's Faculty of Arts and Sciences), and to determine whether and how they needed to be adapted for the Kennedy School's particular situation.

The Committee considered these issues in a series of six discussion meetings over the course of the Spring and Fall. In addition, members of the Committee consulted with those in the Faculty of Arts and Sciences and Harvard's other professional schools (Law School, Business School, Medical School, School of Public Health) to learn what their policies and procedures were. On the basis of these explorations and deliberations, the Committee has drafted some new guidelines regulating potential conflicts of commitment and interest, and the conduct of outside sponsored research. These rules and guidelines are presented as appendices A and B of this report.

These documents are intended to provide specific, concrete advice to faculty members at the school about how to identify and deal with potential conflicts of interest and commitment in their individual relationships with the School, and in the conduct of outside sponsored research. While these documents have the feel of "black letter law", a key element of our approach to enhancing professional values and preserving research integrity is not mere compliance with rules, but instead a heavy reliance on consultation.
about particular situations as they arise. In fact, the rules and guidelines explicitly define different situations that present different levels of concern about personal or school integrity, and [require] faculty members to deal with these different levels with different levels of consultation, and with different kinds of protective mechanisms. There are some areas which require no special attention. There are others that require much closer scrutiny to be allowed to go forward.

The purpose of the guidelines and the consultative mechanisms, of course, is to provide and protect the maximum degree of individual freedom consistent with our obligations to one another, and to the institution of which we are all a part. It is also to help create a framework within which we all can continue to learn about these issues, and the best way to respond to them. In fact, we envision a kind of "common law" emerging from on-going consultations stimulated by these new guidelines.

More important than this "black letter law", however, is the understanding that the committee came to about the nature of these issues, and the best way to handle them in the context of the Kennedy School. This report is, in effect, a commentary on the guidelines that we have proposed not only so that other members of the faculty may more easily judge their merit, but also so that they can be
understood and become powerful in the broader context of reaffirming some of the core values of the institution to which we all have committed so much of ourselves.

One final introductory note: once we had considered issues associated with outside sponsored research, it turned out to convenient for us also to clarify the principles and procedures the School now follows with respect to the acceptance of gifts to the school. Moreover, in thinking through the organizational structures required to support the kinds of oversight and consultation that these new rules implied, it proved useful to reconstitute the existing Gifts Policy Committee in ways that would allow it not only to oversee the school's fundraising activities, but also to assume some of the responsibilities that would arise under the new systems for reviewing outside sponsored research activities, and individual faculty conduct. Consequently, we have included a statement on "fundraising and gifts policy" as well as on "conflicts of interest and commitment" and the regulation of "outside sponsored research."

II. Basic Assumptions

We begin with some key assumptions about the nature of the contract between the Kennedy School and its individual officers.
The Privilege of Academic Freedom

First, as officers of the Kennedy School, we see ourselves first and foremost as members of an academic community. As such, in conducting research, our fundamental commitment must be to objectivity and the pursuit of important truths. In addition, we have the obligation to identify important unasked, and not yet answerable questions, and to put these questions before society and our colleagues in useful and intellectually compelling ways. In teaching we must help to transmit important truths to students, and find ways to stimulate their critical thought.

That complicated enterprise is aided by a firm commitment to sustaining the privilege of academic freedom. History teaches that it is desirable for a society to have some institutions in which truth and understanding can be pursued by allowing individuals to be free to pursue whatever issues they wish to understand, using whatever methods seem appropriate (with some restrictions to protect the subjects of experimentation), and to teach what they believe to be important. The assumption is that, in a University like Harvard, individual faculty members have earned that freedom by succeeding in the rigorous screening methods that lead to their appointments. Furthermore, there is a strong presumption that their continuing virtue and
skill is better tested by the process of external peer review than by internal administrative regulation. Thus, in the academic community there is a strong initial presumption against regulation of the individual conduct of faculty members lest such regulation chill the spirit of free inquiry.

Collective Responsibilities

In considering to what extent the presumption of academic freedom may be abridged, however, it is worth noting that academic freedom is not a right possessed by individuals. It is a privilege that is granted to individuals as a condition of their holding a particular position in a particular kind of institution. Individuals earn the privilege by continuing to live up to the values of the academy (which include the vigorous pursuit of truth), and serve the institution's broader social purposes.

So, although we begin with a strong presumption of individual freedom, we also recognize that individual faculty members have responsibilities to the Kennedy School as an institution. These obligations derive from several sources. First, our appointments as officers of the school require good faith efforts on the part of faculty members to live up to their research, teaching, and administrative responsibilities in the School. Second, we each have a
responsibility to other individuals in the Kennedy School community including colleagues, staff, students and alumni whose lives are affected by the work we do in the name of the institution of which we are all a part. Third, we have responsibilities to Harvard and the Kennedy School as institutions to which many of us have committed a substantial portion of our professional lives.

[For their part, the School and the University have a responsibility to support and protect the reputations and freedom of their researchers. In the long run, the institutions and the individuals have a common interest in preserving the commitment to excellence and integrity]

Obviously, it is best that these obligations be strongly felt and personally honored rather than legislated and collectively required. Nonetheless, it may sometimes be appropriate for the KSG as an institution, and the Faculty as a collegial body, to define the nature of these responsibilities more specifically, and to develop procedures that encourage faculty to seek consultation about these matters and that promote compliance with these common duties and responsibilities.

Collective Responsibility and Private Life
While it is obviously true that individuals have private lives well beyond any legitimate interest or reach of the Kennedy School, it is also true that the Kennedy School may have some legitimate interests in some conduct that is ordinarily considered private. [Of course, from the point of view of an extremist on academic freedom, one might consider all conduct of a faculty member to be private in the sense that they are the only ones who decide what they do with their time. In such a view, the freedom they enjoy could be seen as buttressed by an obligation to respect the privacy of individuals as well as to facilitate the performance of their particular roles as academicians.

But most faculty members have some more particularized notion of their private time in which they feel unburdened by particular obligations to the School and the University. Indeed, they are encouraged to think in these terms by the existence of explicit policies that allow them to do some work for pay outside the boundaries of the university. For some, the conception of private time includes all the time available to them after they have satisfactorily met their teaching and administrative responsibilities to the school. For others, it means that time that they are away from the School working on non-school directed projects. For still others, it means only that time that they are working for pay from someone other than the university.
In this "private time" faculty members engage in many important professional activities. They participate in partisan political activity. They engage in volunteer work in their communities. They consult to governments and corporations affected by governmental policies. Not all of this work is compensated by outsiders. Much of it is in the interest of the School and the broader society.

Although we might like to, in undertaking such activities, officers of the Kennedy School cannot divorce themselves entirely from their ties to Harvard and to the Kennedy School. Indeed, those who ask for help from KSG faculty members may be relying on their connections with Harvard and KSG to establish the presumptive value of their work. To the extent that is true, to the extent that outsiders are using a faculty member's affiliation with Harvard to enhance their stature, [or, more generally, to the extent that outside activities could reasonably appear adversely to affect the school] Harvard and the Kennedy School retain some interests not only in how much of this activity individual faculty members engage in (which has been the focus of past policies relating to conflicts of commitment), but also in how they do it (which has heretofore been unexamined).
There are some, for example, who believe that the KSG faculty should never be involved in partisan politics, or in close consultative relationships to managers of government agencies. Their reasoning is that such relationships necessarily require deep commitments to people and purposes that are inconsistent with the spirit of objectivity and skepticism that are the hallmarks of academia. In effect, the commitments require the faculty to censor themselves and their judgments in ways that are damaging in the short run (since they remove some potentially useful and critical voices from the public dialogue), and potentially corrupting over the long run (since self-censorship might become a habit, and dull the scholar's commitment to criticism).

What most of our committee believes, however, is that these connections to practice are far too valuable to the overall mission of the school and to the professional development of its faculty to be proscribed. In effect, such relationships constitute our "clinical practice." Our responsibility, then, is not to avoid these activities. Instead, it is to select those activities that give enough scope to use our talents well, and to perform them in ways that set high standards for the profession -- including a continuing, visible commitment to truth and the public interest rather than to any particular client's interests.
As academics engaged in the war of ideas that is an important part of politics, we have to keep a piece of ourselves open to the idea that we might be wrong and our opponents right, and to rely to some degree on dispassionate (but not disinterested) reasoning to continue to shape our views. Indeed, in democratic governance, such a stance may be an important standard of professional conduct for everyone, not just scholars. But it is particularly important for scholars. Just as one might expect a law professor to have a greater commitment to the orderly development of the law (relative to the representation of an individual client's interests) than an ordinary advocate; so one might expect a Kennedy School faculty member to retain a different kind of commitment to the public interest than a politician or manager. In short, there is a strong expectation that the work of individual faculty members in professional activities should continue to be distinguished by the qualities of objectivity and excellence that qualified them for appointment to Harvard.

The Implications of Being a Professional School

The discussion above reveals another key assumption: namely, that the Kennedy School is a professional school rather than a wholly academic enterprise. The implications of that status are, we believe, profound for any efforts to guarantee the school's integrity, objectivity, and
reputation through regulations guiding individual conduct, outside sponsored research, and fundraising activities. As a professional school, we cannot simply retreat to the ivory tower and rely on its aloofness to protect our virtue. We must engage those who are engaged in governing. The challenge is to find ways to engage such people -- our profession -- in ways that will protect us from unwarranted charges of conflicts of interest and commitment, or bias in our research, or inappropriate fundraising efforts.

A professional school of government finds its ultimate worth and meaning not only in its ability to develop important truths, but also in its ability to improve the practice of government. That means that the value of its research cannot be measured solely by its contribution to knowledge, but must also be measured by its relevance, and its utility in helping the society understand where the public interest lies, and how to advance it. It also means that the value of its teaching rests not only in its ability to teach students what is known, and what methods to use to learn more about particular subjects, but also in its ability to teach students to act ethically and effectively in the world.

Given these objectives, the Kennedy School's boundary with "the real world" must be more permeable than the boundary that protects other parts of the University
from challenges to their objectivity and integrity. To fulfill its purposes, the Kennedy School must [enable its faculty to] step out of the ivory tower and into the arena of public policy debate. It cannot choose to ignore important problems facing the government because they are controversial, or because powerful interests have stakes in governmental decisions. It cannot choose to train students without concern for their values and ethics because its purpose is to improve the practice of government.

Instead, it must be attentive to the concerns of the profession, and the developments that are occurring within it. It must seek to influence the practice of government by developing strong relationships with those who work in government. It must incorporate within its faculty those who are interested and skilled in helping the processes of government work better than they now do.

By operating in close contact with "the real world", Kennedy School faculty inevitably expose themselves to temptations that are more remote, and in many ways, more subtle, than the temptations facing many other parts of the University. In various science departments of the Faculty of Arts and Sciences and in the Medical School where discoveries are made that have important commercial applications, the University must take steps to make sure that the commercial interests do not claim too much of the
faculty's time, do not skew the overall research efforts of the University, do not lead to the exploitation of University personnel and graduate students, do not compromise the research product and harm the reputation of the institution, and do not undermine the tradition of openness and service to the public interest that are the defining qualities of a university. (It must also take steps to ensure that if commercial applications are developed, and University resources were used to create them, that the University shares in some of the economic returns.)

In other professional schools such as the Schools of Law and Business Administration where faculty members acquire knowledge through both their scholarship and their independent professional activities that have great practical value, the Schools again, have to guard against faculty members becoming too entangled in outside professional activities, and, to some extent, from using their own time to compete financially with their own institution.

These temptations are real enough. But they are only about money. And they arise in a relatively clear form in which the individual faculty member's economic interests are pitted against his or her responsibilities to the public, or to the employing institution. In effect, they are resolved by asking how much the individual faculty member's right to
academic freedom and a private life must yield to the institution's right to insure that it claims its fair share of the faculty member's attention, and that the faculty member live up to the University's historic commitment to serve the public broadly rather than narrower commercial interests.

In the Kennedy School, as Dutch Leonard's memo on Conflicts of Interest and Conflicts of Commitment illustrates, the currencies that may be used to tempt faculty members are far wider, and can be more easily rationalized as public contributions than in other parts of the University. Because the Kennedy School works on important public issues, it is easy to court, and be tempted by, fame, power and influence as well as by money. Indeed, these as much as money are the powerful currencies that circulate in the public sector. Moreover, because the issues are public, it is easy to persuade oneself that one's actions in developing and advancing policy ideas are well motivated and in the public interest.

It is also easy for others, however, looking at the actions of individual faculty members, to find in their conduct at least the appearance of private interest or political bias. This is particularly true when natural communities of interest arise among people who share a political outlook and a set of beliefs about how the world
works, and what makes for effective public policy. So, it is particularly easy for Kennedy School faculty members to become involved in situations where there appear to be conflicts of interest or commitment between them and the School, or where their research or teaching activities seem tainted by biases of various kinds. The challenge for individual faculty members and the school, then, is to find ways to protect their own and the school's integrity without cutting off the close engagement with the profession that is necessary for the school to achieve its overall goals.

The Implications of Being a New Kind of Institution

The last important assumption we made about the context within which we were trying to legislate was to recognize that, as a professional school of government, the Kennedy School was a new kind of institution. Unlike the Law School, the Medical School, and the Business School, the Kennedy School is new and rapidly developing. This has two important implications for the moral life of the school.

The first is that there are neither long traditions nor powerful models from other institutions to guide our development. We are having to invent ourselves. That means that many of the protections that we can take for granted in other institutions (such as powerful external academic communities and larger peer review processes) are less
convincingly established in the case of the Kennedy School. The path to virtue is less clearly marked, and less closely guarded than in more established and larger national enterprises.

The second is that faculty members at the Kennedy School have been asked to accept unusual levels of responsibility for the development of the institution. They have shouldered fund raising responsibilities, and undertaken to design key administrative features of the school as well as assumed the ordinary burdens of teaching and research. On the positive side, that has produced a culture at the Kennedy School that generates unusual feelings of responsibility for the enterprise. On the negative side, that same fact has given the enterprise a more entrepreneurial and managerial cast than may be healthy.

The net effect of these distinctive features of the Kennedy School is that we have fewer natural controls and more external temptations. We are also extremely visible. Consequently, it is specially important that our policies and procedures be worked out in ways that protect the school [and its researchers] not only from the reality of compromised objectivity and quality, but also from its appearance.
That is what we have tried to do in drafting three distinct sets of guidelines: the proposed Policy on Conflicts of Interest and Commitment; the proposed Rules for Accepting and Conducting Outside Sponsored Research; and the proposed Policies Regulating Fundraising and the Acceptance of Outside Gifts. [In these provisions, we have sought to find devices that can, at relatively low cost, allow us to continue to do the complicated, value laden, contentious work that we must do to achieve the overall objectives of a professional school of government without exposing the institution to credible charges that our work is biased or politically motivated, and without exposing our faculty members to too much regulation or control. We understand and regret that any effort to introduce more regulation in these areas not only threatens the principle of academic freedom, but also blunts the initiative of faculty, increases the burdens associated with doing policy related research, and may even sow seeds of mistrust that will produce ever more complicated regulatory arrangements to try to restore the trust that was once the sole basis for the relationships that are now being regulated by rule. Yet, if, in the interests of protecting the school's overall reputation, we must work collectively to guard against the appearance of bias in our work, and that is the price that must be paid for continuing to engage important and controversial issues, we believe that price should be paid.
III. The Kennedy School's "Policy on Conflicts of Interest, Commitment, and Value": A Commentary

The basic focus of the School's "Policy on Conflicts of Interest, Commitment, and Value" is the conduct of officers of the Kennedy School. It seeks to advance the collective interests of the Faculty by striking the proper balance between the desire to protect the personal privacy and academic freedom of individual faculty members on the one hand, and to advance the overall mission of the School on the other. The principal interests that the Faculty and the School seek to protect are: 1) that its faculty members not use their positions within the School to influence the School's financial interests in ways that are harmful to the School; 2) that faculty members live up to their professional commitments to the Faculty and the School; and 3) that the School's reputation for objectivity and quality not be impaired by the conduct of individual faculty members.

Note that this body of doctrine does not deal with outside sponsored research conducted within the Kennedy School. That is why we need a separate document governing the conduct of outside sponsored research. It does apply to faculty members conduct both inside and outside the school. It is concerned not only with making sure that outside activities do not grow so large that they detract from the
Faculty member's professional efforts on behalf of the school, but also that the activities be conducted in a way that contributes to the School's reputation for objectivity, and for its support of democratic values.

The Committee began with policies previously promulgated at the Kennedy School. These, in turn, were based largely on the faculty of Arts and Sciences. Upon examination, these policies seemed less than perfectly suited to the Kennedy School, and were, in some important respects, incomplete. As a result, the Committee re-drafted the proposals. They now differ from the former KSG and FAS policies in the following important respects.

First, to reflect the School's special status as a professional school, the new policies place greater emphasis on the positive value of many kinds of outside professional activities. The FAS policies allowed such activities, but did so grudgingly. [The Business School's current policies give a ringing endorsement to outside activities such as consulting for private companies. In our policies, we seek to affirm the value of on-going contact with professional world that we seek to understand and aid, but to encourage faculty members to be discriminating about the different value and potential hazards of different kinds of contact.]
Second, they add a new domain of concern beyond conflicts of interest and conflicts of commitment -- something we have called "conflicts in value." This addition seemed necessary to reach a kind of conduct that is particularly important in the Kennedy School context -- namely, private activities carried out for money, fame, and policy impact, that could nonetheless have an adverse impact on the reputation of the School.

Third, the new policies explicitly include the 20% rule that seems to be uniformly but tacitly adopted throughout the University, and extends reporting to include time-consuming but unpaid activities.

Fourth, we have extended some, but not all, of the restrictions that would apply to outside research sponsored within the Kennedy School to research that is undertaken during one's "private time." On one hand, under these provisions, faculty members are still allowed to engage in some proprietary or confidential research on their private time. On the other hand, these provisions reinforce the expectation that faculty members will bring to their private consulting activities the same intellectual qualities and value commitments that justified their appointment as faculty members. These provisions also [encourage faculty members to consider the consequences for the school and their colleagues of maintaining relationships with]
individuals or causes that are commonly seen as the enemies of such important values as the vigorous pursuit of truth, the love of freedom, or the tolerance of diversity.]

[This later concern about faculty members establishing relations with individuals or causes that are commonly seen as enemies of important values deserves some special discussion. We are motivated to suggest such provisions for essentially three reasons. First, we do not believe that it is entirely possible to separate oneself and one's private life from one's institutional identity. Each of us carries a little of everyone else's reputation around with us. We think it is important as a matter of collegial responsibility to think about how our commitments and associations affect the reputations of others in the community. Second, we note that concerns about these matters figure prominently in our decisions to accept gifts and endowment. If such concerns are important in that domain, it is not obvious to us why they should not be important in the domain of our professional work and associations as well. In effect, if we are fussy about whom we honor in accepting gifts, perhaps we should be a little fussy about whom we work with.]

[Of course, there are important differences in the school's stakes in avoiding "conflicts of value" in the separate domains of: 1) "private time"; 2) outside sponsored
research; and 3) endowment and gifts. The interests are greatest and most tightly regulated in the area of endowment, for, in accepting gifts, we are honoring the donors. They are somewhat less in the domain of outside sponsored research where no endorsement of the sponsor is indicated. And they are least important in the domain of private time where no school endorsement is implied, and where faculty members are protected by concerns about academic freedom and privacy as well.

For this reason, potential "conflicts of value" in the domain of individual conduct are not subject to any particular limitations. One is not even required to consult about them. We are simply urging that, as a matter of conscience, faculty members think about the opinions of their colleagues before establishing relations with those who could be regarded as enemies of tolerance, truth and humanity.]

Fifth, we have extended some obligations to disclose work one is doing on one's own time to the School's administration when the relations created by that work might jeopardize the objectivity of one's individually published work, or the work that emerges from outside sponsored research carried out within the Kennedy School. These changes are important to deal with one of the principal threats to the actual or perceived objectivity of our
research efforts -- whether performed as an individual researcher, or in the context of outside sponsored research.

IV. The Kennedy School's "Policies Relating to Outside Sponsored Research": A Commentary

The focus of the "Policies Relating to Outside Sponsored Research" are research agreements made between the University and outside sponsors. Research activities carried out by individuals in their private time are regulated in the "Policies Regulating Conflicts of Interest, Commitment and Value", but there are some features of those regulations that are utilized in the regulation of outside sponsored research as well.

In working this terrain, the Committee had more disjoint, and less well developed materials on which to rely. We had the University's "Policies Relating to Sponsored Projects" for which we are all accountable, and which are published in our Principal Investigator's Handbook. Also included in that publication are "Guidelines for Research Projects Undertaken in Cooperation with Industry." We also had the recent report of the Medical School -- including the "Faculty of Medicine Statement on Research Sponsored by Industry". Finally, we had Bill Hogan's memorandum entitled "Guidelines for Funding Policy Research."
A. The Value of Sponsored Research

In discussing this subject, we also found that we had to take a step backward before we could address the issue intelligently. We understood that it might be important to allow individual faculty members to engage in outside activities so as to protect academic freedom, and in the interests of their professional development. But it was less clear why it was proper for the School as a whole to be involved in outside sponsored research.

One committee member argued powerfully that it was improper for the School to accept any outside money to carry out research. The argument was that acceptance of money from outside sources -- particularly from private entities with well defined commercial interests, and governments with well defined political and bureaucratic interests -- was fundamentally compromising. In this view, researchers could not help but be influenced by the interests that lay behind the money. It would shape the research agenda of the school in ways that were inconsistent with objectivity and academic freedom. And it might even influence the results. Even if that were not true, soliciting outside funds damaged the reputation of the school. It suggested that the school were for sale for money or glory. At a minimum, it was simply undignified, and could not help but undermine our independence over the long run.
This position was a useful starting point for it forced other members of the committee to consider once again why it is valuable for us to accept outside research, and what dangers must be warded off. The conclusions a majority of the committee came to were the following.

The principal reason to accept outside sponsored research projects is that it allows important intellectual activities to occur that would otherwise not. It is not important that the school grow larger. It is important that it engage in valuable intellectual inquiry, and through that process, develop its own faculty and students. The basic business of the School is to produce quality ideas that matter, and to develop the methods and people who can produce more of these. The activities made possible by outside sponsored research allow us to accomplish these objectives. Research results are produced. Faculty are not only gainfully employed, but developed. Opportunities for junior faculty and students to learn about the arts of policy analysis and management are created. The school develops capacities and reputations in new areas.

Of course, all this is valuable only if: 1) the project to be undertaken is something that is of intellectual interest to the faculty members who are involved; 2) the ultimate product is of both high quality
and utility; and 3) the faculty member can be effectively insulated from the pressure of the interests that lie behind the funding. Otherwise, the line between the School and notorious "Beltway Bandits" disappears.

The alternative way of financing such activities would be through endowment or current use gifts. At the outset, such sources look far more attractive because the interests that lie behind such gifts are often quite different than those that lie behind sponsored research. The claims are more personal and often more remote, therefore less threatening to research objectivity. And this suggests that, all other things being equal, we would prefer to fund the research activities of the school through these rather than more determinedly interested sources.

But there are potential problems in relying only on endowment on these sources. [One is the practical problem that there may not be enough of them to support the level of effort the school would like to make across the wide variety of fronts in which it is trying to work.] But even in principle, there may be objections to gifts analogous to those raised by accepting outside sponsored research: the donor may have a powerful interest in seeing particular areas studied, and particular conclusions reached. To a great degree, we are protected from such influence by long established university policies that prohibit the school
from accepting gifts that threaten to compromise the "four essential freedoms" of the University: namely, the freedoms to appoint faculty members, conduct research, select students, and develop and field a curriculum. In addition, objections may be raised if the University's acceptance of a gift seems to honor ignoble people or causes. So even endowment can leave a potentially corrupting taint that must be dispelled.

[There is one further reason to be concerned about sole reliance on gifts or endowment. There is a risk that if all the research conducted in the School were supported by endowment, we might lose some of its immediate relevance and utility. Of course, one must ordinarily presume the value of independent scholarship and acknowledge the potential long run contribution that such scholarship can make to the future practice of government. Moreover, one must admit that there are many other ways in which faculty members can stay close to the practice of government other than by competing for governmental research grants and contracts.

But still, one must also acknowledge that in the ivory tower, there is no requirement for relevance, and therefore that some of the pressure to be useful, and that some of the learning that might be occasioned by the need to be useful might be lost. That loss may not be particularly costly for a Department of the Faculty of Arts and Sciences
that reckons its contributions to the world in different dimensions and longer time scales than a professional school of government. But one can argue that such losses would badly undermine the rationale for the Kennedy School as a whole.

This risk can be minimized by having the school engaged in some outside sponsored research. In effect, some "market exposure" may be a useful corrective to the insulation that endowment or disinterested gifts provide. What is dangerous is when costs or financial pressures drive us to take up subjects or projects that are not appropriate on terms that are not appropriate.

The reasons to accept outside sponsored research, then, are: first, to do valuable work that would otherwise not be done; second, to develop the school and establish important working relationships with the members of our professional constituency; and third, to keep the school in touch with important issues. These are all particularly important given that the Kennedy School is a professional school.

This discussion also makes clear what we should guard against. Just as we must guard against infringements on the four freedoms in accepting endowment, we must do that in accepting outside sponsored research. Just as we must
avoid honoring dishonorable institutions or individuals in accepting endowment, we should avoid too close ties with outside sponsors who are particularly corrupting. In addition, we must take steps to protect culture of University -- particularly openness, objectivity, criticism, and independence. Finally, we must set up more particular efforts to insure the objectivity and quality of the research.

Of course, the most important way to ensure the objectivity and quality of the research is by hiring good faculty and making sure that they are intimately engaged in the research efforts. Even here, some correction may be necessary, for our current policies are a little loose with respect to required levels of faculty involvement in outside sponsored research projects.

Even if we were satisfied with the level of faculty involvement in outside sponsored research, however, we would still have to do more. The reason is simply that the relations we set up to carry out research are often potentially corrupting -- particularly in situations where the faculty member has a larger, longer lasting, more personal relationship with some of the sponsors of outside research. And even if the relationships are not corrupting, they can easily appear to be so. Finally, we must acknowledge that the peer review mechanisms for our work are
not as strong as those for traditional academic work. Some of our work is published outside the context of peer reviewed publications -- in our own working paper series, in reports, in pamphlets and so on. And the standards for judging the quality of policy work -- much of which includes important assumptions about values and purposes and possibilities as well as fact -- are not as clear as for strictly academic work. Consequently, we must work a little harder to assure ourselves and others about the objectivity and quality of our work.

To deal with these problems, we propose a system of prior review that seeks to identify the extent to which the potential for bias exists in the study, and to propose more or less elaborate methods of guarding against bias based on the size of the threat. The most sensitive projects are those that are funded exclusively by outside sponsors with concrete, immediate interests in the results of the research, and that are led by faculty members with continuing professional relationships outside the boundaries of the school. Such projects may be undertaken, but they require extraordinary efforts to guard against bias including more diversified funding, disclosure of both financial support and on-going relationships, outside review, and so on.
Somewhat less sensitive cases would be those where there was either a powerful, single outside sponsor, but no on-going professional relationship with a faculty member; or where there was a powerful professional interest of a faculty member. In these cases, fewer special protections would have to be established than in the most sensitive cases.

The principal devices available to the School to be used to provide some degree of protection while working in situations where the appearance of a conflict of interest is strong include: disclosure of funding; disclosure of prior interests and positions; multiple funding sources; and external technical review.

Even with prior review of research projects, criticisms of our research efforts can be expected. An important question is how the School will respond to such criticism. The answer should be that the School should, as a matter of firm policy, act on the presumption that its Faculty members are unbiased and professional. Complaints that do not go beyond an observation of an apparent conflict of interest that had already been acknowledged and dealt with in the prior review process should be responded to with an explanation of how the research is being conducted by the appropriate faculty member. [More serious complaints can and should be reviewed by the Dean, or the Associate Dean, or
the Research Committee, but in conducting such reviews, it is important to keep in mind the importance of protecting the internal and external reputation of the faculty member involved, and the climate of trust that must exist between the school administration and its faculty if we are to remain a collegial body. Only the most serious complaints offering credible evidence that the research is in fact biased should trigger a close, comprehensive investigation.

In addition, the Committee thinks that regular external peer reviews of the activities of Research Centers (in which a great deal of the School's outside sponsored research is done) should be conducted.

Finally, the Committee believes it is important not only to guard against bias in individual research projects, but also to guard the school against too great an overall dependence on outside sponsored research, and the "skewing" effects that such dependence could produce. To deal with this threat, we have recommended an annual review and report on the aggregate pattern of research being carried out by the School. This could be done by the Research Committee in the context of the publication of our Annual Research Report.