

AY2024 Public Research Fund Misconduct Prevention Plans

Tokyo International University

Basic policy of misconduct prevention measures

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Because the source of funding is dependent on the tax burden of the nation's people, the funds must be used appropriately, effectively, and with discipline in order to respond to the expectations and trust of the people. Based on this, under the responsibility hierarchy stipulated in "Standards for Implementation of Management and Audits of Public Research Funds at Tokyo International University", the president, who is the final manager of the operation and management of competitive research funds, will take the initiative as the basis for the proper operation and management of public research funds.

Based on this basic policy for misconduct prevention measures, the general manager and General Administration and Academic Subsidies Office of the Academic Affairs Department, which is the prevention plan promotion department, will formulate misconduct prevention plan as the highest level of concrete measures for the entire university.

1 Purpose of this plan

This plan is based on "Section 3 Identification of Factors Leading to Misconduct and Formulation/Implementation of Misconduct Prevention Plans" of "Standards for Implementation of Management and Audits of Public Research Funds at Tokyo International University", and aims to organize and evaluate the university-wide situation regarding the causes of misconduct related to public research funds and establish a specific activity plan to contribute to the prevention of fraudulent activities.

2 AY2024 Action items

(1) Implementation of KAKENHI Compliance Workshop

- ① Target: Faculty (Principal Investigator / Co-Investigator), Administrative Staff
(Chief Administrative Officer, General Administration and Academic Subsidies Office, the Accounting and Finance Section)
- ② Duration/Frequency: About 30 minutes/Once
(On-demand video distribution method)
- ③ Implementation timing: October - December
- ④ Contents:
 - Basic understanding of compliance, code of conduct, misconduct prevention efforts, understanding of the research funds spending rules, examples of improper use and penalties, etc.
 - Incorporating specific examples as content to raise understanding and awareness of misconduct prevention measures, impact on the institution, matters to be observed, such as operational rules, procedures, accusations, etc., disciplinary action of the institution when misconduct is discovered, liability for own compensation, restriction of qualifications such as application at the distribution institution, measures such as refund of research funds, etc., misconduct prevention measures at the institution.

(2) Implementation of Awareness-Raising Activities

- ① Target: A. All faculty and staff,
B. Students who receive honorariums, travel expenses, etc. due to competitive research expenses, etc.
- ② Frequency: A. At least once a quarter B. At least once a year
- ③ Implementation timing: A.B. As needed
- ④ Contents: A. Result of misconduct prevention plans and internal audits, improper use cases that actually occurred (including cases of other organizations), things that enable consideration and sharing of awareness regarding the causes of misconduct, etc.
B. Disseminate the rules to students who receive honorariums,

travel expenses, etc. by competitive research funds, etc.

- (3) Identify risk factors by conducting internal audits and through preventative measures

< Factors that are likely to lead to misconduct >

To prevent misconduct, it is desirable to introduce a mechanism that does not require researchers to be involved in payments.

< Measures >

With promoting the usage of Amazon Business, payments to Amazon, which has the highest number of advance payments for faculty members, will be made to university payments.

- (4) Preparation and implementation of internal audit plan (June~December)

- (5) Request a written oath from all members involved in the operation and management of competitive research funds (as needed)

- ① Faculty (Principal Investigator / Co-Investigator)
- ② Administrative Staff (General Administration and Academic Subsidies Office, the Accounting and Finance Section, etc.)

- (6) Request an oath from suppliers (As needed)

If all of the following four requirements are met, or if it is deemed necessary in light of the "Standards for Management and Auditing of Public Research Funds at Tokyo International University", we request the relevant supplier to submit an "oath".

- ① A supplier selected by a researcher.
- ② There are no estimates from two or more companies.
- ③ Second order to the same supplier.
- ④ The total amount of one order is 100,000 yen or more.

- (7) Confirmation of budget execution status and request for additional plans for

significant delays (December)

- (8) Equipment physical confirmation (Target: PCs during the research period, equipment of 100,000 yen or more, and highly cashable items※) (November)

※ e.g. of highly cashable goods : Digital cameras, video cameras, TV, recording equipment

- (9) Inspection of Specialized Services (as needed)

For acceptance inspection of the following special services which require knowledge about IT, request the IT Systems Division to carry out acceptance inspection.

- ① Development and creation of databases, programs, and digital content
- ② Maintenance and inspection of devices

AY2024 Public Research Fund Misconduct Prevention Plans Appendix

※【From Section 3 (2) “Notes on Implementation (i)” of the separate MEXT Guidelines】

Factors Leading to Misconduct ※		Misconduct Prevention Measures of TIU	
1	Discrepancies between the rules and the actual circumstances (researchers placing orders without authority to do so, normalization of exception processing, etc.)	①	“Manual on the Spending and Administration of Grants-in-Aid for Scientific Research (KAKENHI)” (hereinafter “The Manual”) is posted on POTI.
		②	The manual is updated every April and at any time during the year.
2	Final decision procedures are complex and assignment of responsibilities is unclear	①	Unified to “Tokyo International University Rules regarding Collective Decision-making and the Authority to Make Final Decisions”.
3	Tendency of budgets to be executed at specific times	Explanation	Misconduct is more likely to occur if budget execution is concentrated at the end of the year.
		①	Described in the manual that Kakenhi has a carry-over system to the next fiscal year and an extension system for the subsidy period, and explained at the compliance workshop.
		②	Encourage researchers to use research funds in a coordinated way every year in December.
		③	Expenditure schedule after February requires submission of “Extension Request for Research fund Expenditure”.
4	Occurrence of problems of non-payment to vendors	Explanation	Invoice submission is delayed, or an order for more than the remaining amount of research funds causes unpaid payment to the contractor.
		①	For payments of 100,000 yen or more, submission of the University Form “Usage reason form” is required in advance.
		②	In principle, if the amount is 100,000 yen or more, the payment will be made directly by the university.
5	Departments/laboratories where competitive research funds, etc., tend to be focused, or that have newly acquired large-scale competitive research funds, etc.	Explanation	<ul style="list-style-type: none"> • Note that multiple Kakenhi cannot be combined. • Large-scale research funds tend to have a large balance, so it is necessary to understand the correct carry-over rules.
		①	The carry-over system and period extension system are described in the manual and explained at the compliance workshop.
		②	Expenditure schedule after February requires submission of “Extension Request for Research fund Expenditure”.
6	Insufficient checking of transactions (Management of the transaction logs in administrative departments and management of information regarding selection of vendors are insufficient)	①	Record vendors for each researcher.
		②	As a basis for selecting a vendor, if the price is 100,000 yen or more, estimates from two companies are required.
7	Frequent transactions at the same laboratory with the same vendors for the same items; tendency to place orders with vendors with which only specific laboratories have a track record of transactions or that have newly begun transactions with specific laboratories	①	Record vendors for each researcher. If certain conditions are met, misconduct prevention “oath” will be requested to the vendor.

Factors Leading to Misconduct ※			Misconduct Prevention Measures of TIU
8	Insufficient inspection of special service agreements for database/program/digital contents creation, device maintenance/inspection, etc.	Explanation	For the services on the left, it is necessary for a person with specialized knowledge to confirm whether the order details and contract amount are appropriate.
		①	“Standards for Implementation of Management and Audits of Public Research Funds at Tokyo International University/Standards Related to Inspection of “Specialized Services”” has been prepared. Ask the IT Systems Division to inspect special service contracts which require knowledge of IT.
9	Loss of substance in inspection work and monitoring, etc. (Confirmation by acceptance stamp only, lack of thoroughness in confirmation of the actual items through post-sampling, etc.)	①	At the time of purchasing goods, General Administration and Academic Subsidies Office conducts physical inspection of all cases.
		②	A physical confirmation survey will be conducted once a year. Targets are all PCs and all equipment of 100,000 yen or more.
		③	From AY2021, “highly cashable goods *” will also be added to the target of physical confirmation once a year. ※e.g. of highly cashable goods: Digital cameras, video cameras, TV, recording equipment
10	Delivered items taken by vendors when they leave and repeated use of delivered items in delivery inspections	①	All PCs and all equipment of 100,000 yen or more are managed by attaching equipment stickers and using the “equipment ledger”.
11	Management of employment, such as confirmation of the work status of part-time employees, is left up to the laboratory	①	A time card is required for the work status of part-time employees.
		②	The stamp of the part-time worker is required on the attendance chart.
		③	Conducted hearings with the part-time worker in the internal audit. In addition, check the actual work situation by visiting the office or calling without notice.
12	Insufficient procedures to confirm the fact of business trips, etc. (Checking for double payment, confirmation with the business trip destination, etc.)	①	Request the submission of the boarding pass or boarding pass stub if an airplane is used.
		②	Request the submission of materials that can confirm the facts of business trips day by day. (Interview memo, hearing memo, receipts of library entrance fee and copy fee, photo taken during the fieldwork, conference participation slip, etc.)
		③	Conducted hearings with business trip destinations in internal audits.
13	High reliance on individuals or insular workplace environments (accounting work being conducted mainly by specific individuals, etc., long-term assignment to specific departments, inability to go against the intentions of supervisors, etc.) and research environments in which it is difficult to implement effective preventive measures (processing of ordering/inspection work, etc., within the laboratory, isolated laboratories, etc.)	①	The department in charge of the office of public research funds will be designated as General Administration and Academic Subsidies Office, and the organizational structure will be such that payments cannot be made without going through the division in terms of the administrative flow.