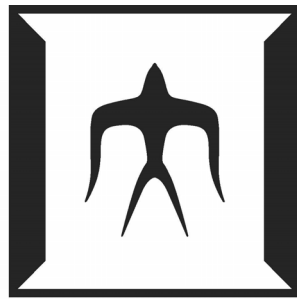


Plan for the Prevention of Improper Use of Education and Research Funds



Tokyo Tech

March 2015
(Revised February 2022)
National University Corporation
Tokyo Institute of Technology

Plan for the Prevention of Improper Use of Education and Research Funds

Introduction

With the goal of becoming a leading science and technology university, developing high-level research is of critical importance. At the same time, in carrying out research activities, each of us, as members of Tokyo Institute of Technology (the “Institute”), must be aware of our responsibilities to society and in complying with Institute rules and regulations.

Most research funds, including management expense grants and competitive research funds, are sourced from taxpayers’ money. These research funds are granted to the Institute by society based on trust. More than ever, members of the Institute are required to fully understand and comply with relevant rules and regulations when they engage in education and research activities and use education and research funds. Carrying out education and research as united members of the Institute and using the funds granted to us by society to produce results is how we can meet society’s expectations.

Recently, the Ministry of Education, Culture, Sports, Science and Technology (MEXT) issued the revision of the “Guidelines for Management and Audit of Public Research Funds at Research Institutions (Implementation Standards)”, revised February 2022, decided by the Minister of MEXT.

This revision includes measures to strengthen preventive measures to promote awareness throughout the research institution in order to create an organizational climate having a high awareness concerning the prevention of misuse of research funds.

In response to this, the Institute will review our measures and create an environment that does not allow any misconduct to occur.

In order to promote scholarly activities in science and technology, giving research results back to society is vital, and the effective use and appropriate management of research funds is important. The misuse of research funds is not only a problem for the university as well as the employee responsible, but also a serious betrayal of the taxpayers who bear the cost of research funds. It is a dire problem that undermines citizens' trust and cannot be tolerated.

Therefore, in addition to the various reforms that the Institute is already pursuing, we will position "compliance awareness reform" as an important issue that is aimed at creating an institutional culture of "realizing an environment that does not allow misuse of research funds to occur and that is committed to education and research with a high moral standard." Further, we will take measures to prevent collusion between researchers (laboratories) and vendors while also assuring that there are mutual checks in place between faculty members and administration divisions. At the same time, we will conduct follow-up to continue viable initiatives. Even in the unlikely event that misuse occurs, the Institute will respond vigorously with not only disciplinary measures, but also with criminal charges and damage claims for all individuals involved.

#1 Strengthening of the Organizational Framework: Delineation of the Institute Responsibilities (Governance)

Objective: We will aim to realize an organization that advances sound management of education and research funds by defining divisions of roles, responsibilities and authority, by assigning personnel in an appropriate manner, and by realizing cooperation between faculty and staff members and within the administration departments.

Action Policy:

- We will delineate the system of responsibility and authority of individuals involved in operation and management of funds, strive to thoroughly disseminate it, and publicize it on and off campus.
- We will construct an institute-wide cooperation system based on the clear leadership of the board members, deans and directors of the Institute who are responsible for management.
- We will strive to increase and penetrate awareness of responsibility among the faculty and staff members as an administrator of education and research funds.

#2 Creation of an Operation and Management Platform: Creation of an Environment that Serves as the Platform for Appropriate Operation and Management (Control Environment)

Objective: We will create effective rules to ensure appropriate implementation and management of education and research funds, as well as to provide information on these rules in an easy manner thoroughly so that all faculty and staff members can understand and master them. In addition, in order to realize a climate that does not allow impropriety to occur, we will make it clear that the Institute will take a strong stance on impropriety, including taking disciplinary actions against the individuals involved. Further, we will strive to improve awareness among faculty and staff members through various measures, including those to encourage the permeation of the Code of Conduct for Researchers at the Tokyo Institute of Technology.

Action Policy:

- We will realize a climate that does not allow impropriety to occur by eliminating factors that lead to impropriety, under the condition that there is always a possibility that misuse of education and research funds will be carried out.
- We will conduct training for faculty and staff members on the rules regarding the management and operation of education and research funds, including the fundamentals, and thoroughly disseminate these rules.
- We will clearly establish rules regarding the Institute's response to cases of wrongdoing, including standards for disciplinary actions against impropriety, and make it clear that the Institute will take a firm response to impropriety.
- We will ensure that all faculty and staff members have the awareness required of individuals who implement and manage education and research funds that are public funds.
- We will publicize information on improper accounting, take countermeasures to prevent similar situations from occurring and disseminate them, and ensure proper conducts of faculty and staff members.
- We will conduct a compliance education and awareness activities to raise the awareness among faculty and staff members.

#3 Ascertainment and Analysis of Factors to Impropriety, and Countermeasure Planning and Management: Risk Evaluation and Risk Treatment

Objective: We will ascertain problems that can lead to the occurrence of impropriety, identify contributing factors, and strengthen and implement the system for establishing, promoting, and managing plans with the aim of implementing countermeasures.

Action Policy:

- We will comprehensively ascertain and analyze risk of occurrence of impropriety and its contributing factors, implement and revise the relevant regulations, etc. as needed, and prevent impropriety.
- The Office for the Appropriate Management of Education and Research Funds will play a central role in conducting the ascertainment and analysis of factors contributing to impropriety

from an Institute-wide perspective, and advance the revision of relevant regulations, etc.

- Each of the departments, etc. will proactively implement the “Plan for the Prevention of Improper Use of Education and Research Funds” in cooperation with the Office for the Appropriate Management of Education and Research Funds.

#4 Activities for the Appropriate Operation and Management of Education and Research Funds: Supervisory Activities

Objective: We will ensure the appropriate implementation of education and research funds, aiming to establish a management system that does not allow impropriety, construct operation and management systems that reduce the risk of impropriety occurrence to the extent possible and detect the risk of misuse from an early juncture. We will create an environment that allows faculty members to engage in education and research activities with peace of mind.

Action Policy:

- We will strive to establish a system that protects researchers from unintended impropriety and rule violations and realizes the effective implementation of education and research funds.
- In order to prevent collusion between faculty members and vendors and to detect from an early juncture the risks that could lead to impropriety, we will construct an effective environment that allows individuals who are not party to the transactions to check when purchasing goods, etc. This will include using computer systems, etc. to appropriately manage both information related to orders placed by faculty members and the status of budget implementation. To that end, we will strongly require vendors to cooperate with the Institute’s efforts against prevention of impropriety.
- We will ensure that administrative staff members verify the factuality of business travel, work, etc. when paying travel expenses, honorariums, or salaries.
- We will disseminate information on examples of misuse and the Reporting and Consultation Service Desk, etc. to workers, such as student assistants, etc., to increase awareness of the prevention of improper use.

#5 Conveyance of Information: Establishment of a System for Ensuring the Conveyance of Information

Objective: In order to effectively support the education and research activities of faculty members, and the education and research support activities of staff members, we will increase awareness of the Reporting and Consultation Service Desk and establish a whistleblower protection system. At the same time, we will create an environment that fosters the sharing of information on an Institute-wide basis.

Action Policy:

- In order to ensure that the Reporting and Consultation Service Desk functions effectively, we will thoroughly disseminate information on the methods and procedures for its use while also

protecting whistleblowers and individuals who ask for consultation.

- In order to efficiently operate education and research funds, we will create an environment that allows Budget Managers and administrative staff members to share information on subjects such as the status of budgets implemented by faculty and staff members.

#6 Strengthening of the Monitoring System: Establishing a Monitoring System that is effective from an Institute-wide Perspective

Objective: In order to strengthen the management of education and research funds, as well as to effect Institute-wide self-purification, we will strive to strengthen the monitoring function and compliance system while also promoting the continuous improvement of management measures.

Action Policy:

- Aiming to minimize the possibility of impropriety occurrence, we will establish a monitoring system that is effective from an institute-wide perspective and capable of detecting from an early juncture any risk of impropriety occurrence.
- We will construct systems and frameworks for ascertaining the level of permeation of various rules among faculty and staff members and for detecting and responding to inappropriate cases such as misuse in a timely manner.
- We will strive to improve the quality of internal audits by reviewing the audit plan occasionally to enhance efficiency and appropriateness, and by cooperating with individuals having specialized knowledge such as certified public accountant.

1. State of the Management System and Responsibilities for Education and Research Funds

Education and research funds will be managed by the Institute. The responsibilities related to their management and operation are as follows. Further, when implementing education and research funds, each individual need to understand their roles and responsibilities in order to fulfill their duties as the responsibilities are different from those related to the operation and management. In the event that their failure to fulfill their supervisory responsibility results in the occurrence of impropriety, these individuals may be subject to disciplinary measures.

(1) Responsibilities for the Operation and Management of Education and Research Funds

Head Administrator: President
Ultimately responsible for the budget implementation of education and research funds, this individual will formulate the basic policy for misconduct prevention measures and take the necessary measures to achieve.
The Head Administrator will also play a leadership role appropriately so that the General Administrator and the Research Integrity Officers responsibly operate and manage the education and research funds.

General Administrator: Executive Vice President for Research

With substantive responsibility and authority over the Institute-wide oversight of budget implementation of education and research funds, this individual will formulate concrete measures based on the basic policy and provide the Head Administrator with status reports of implementation.

Research Integrity Officers: Dean or Director

With substantive responsibility and authority over the departmental budget implementation of education and research funds, this individual will conduct measures to prevent impropriety and compliance education, and will report on the implementation status to the General Administrator.

Deputy Research Integrity Officers: Faculty or Administrative Staff Designated by Dean or Director

This individual will assist the Research Integrity Officer.

Auditor

Being in a position to audit the operation and management of the Institute and to give an opinion directly to the President, this individual will check and express opinion from an overall point of view, including the management and auditing of competitive research funds.

(2) Responsibilities for the Budget Implementation of Education and Research Funds

Budget Manager: Dean or Director

With substantive responsibility and authority over the departmental budget implementation of education and research funds, this individual will monitor the implementation, etc. of the education and research funds, and provide guidance regarding improvements as needed.

Administrative Budget Manager: Faculty (Principal Investigator, etc.) Designated by the Budget Manager

With substantive responsibility for the implementation of individual budget items allocated from education and research funds in accordance with laws, etc., this individual will strictly manage the progress of education and research operations and the status of budget implementation.

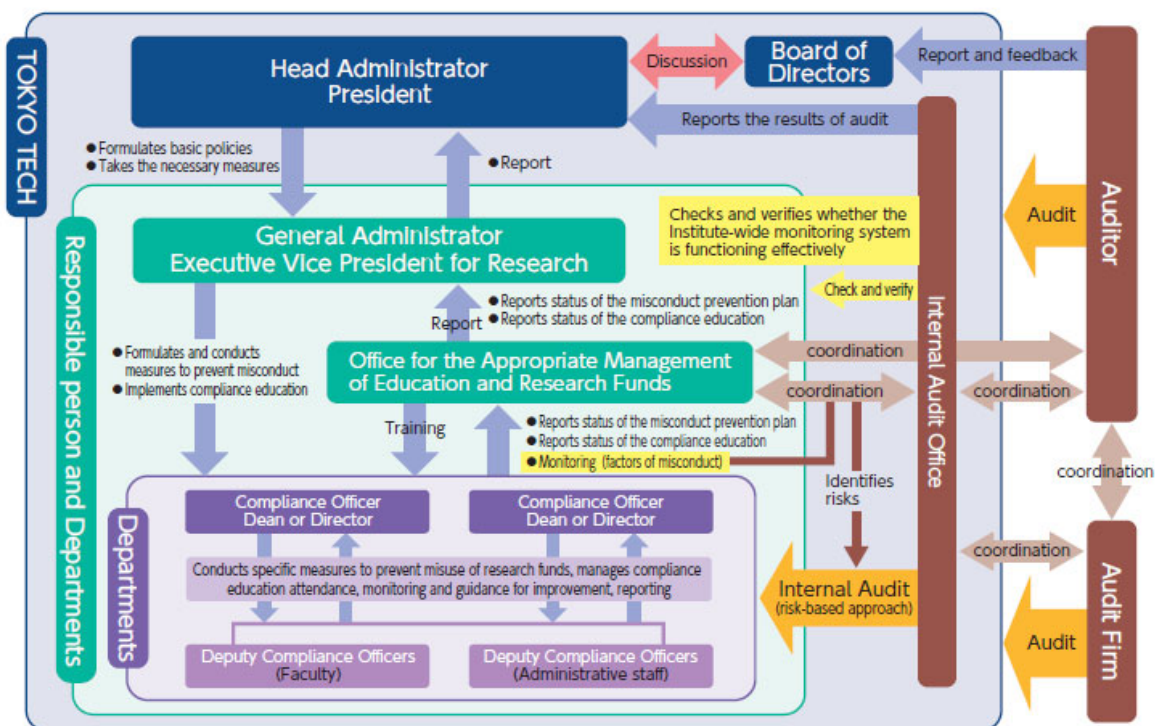
Administrative Budget Executive Assistant: Faculty, Administrative Staff, Administrative Support Staff, etc.

Under the supervision of Administrative Budget Manager, this individual will assist with budget implementation.

Budget Unit

In the event that multiple departments conduct education and research activities using grants, etc. awarded to the Institute, the Budget Manager of the department to which the principal investigator of the subsidized project in question belongs will be responsible for the overall management and implementation of the grant in question. Further, budget items will be created for each department involved, and Administrative Budget Managers will be designated respectively.

Responsibilities for the Operation and Management of Education and Research Funds



2. Overview of the Rules for Implementation of Education and Research Funds

Faculty and staff members must be sufficiently aware of the fact that education and research funds are derived from taxpayers' money, payments made by students, and other valuable financial resources, and furthermore that they must ensure their fair and effective implementation through proper management by the Institute. Needless to say, requesting vendors, workers, etc. to falsify or fabricate documentation will be subject to disciplinary measures.

(1) Basic Flow for Purchasing goods

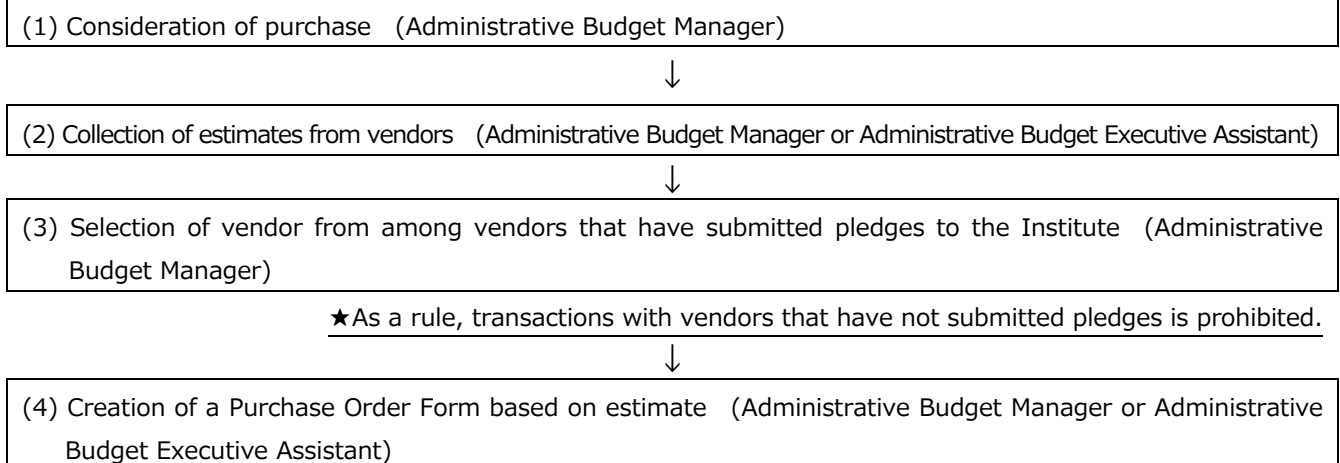
① In the case of contracts worth 1 million yen or more, the designated contract administration division that receives the contract requests from the Administrative Budget Manager will select the vendor and place the order. When the vendor in question delivers the item to the laboratory, designated administrative staff members will inspect it. After collecting the documentation from the vendor and receiving approval, payment will be made.

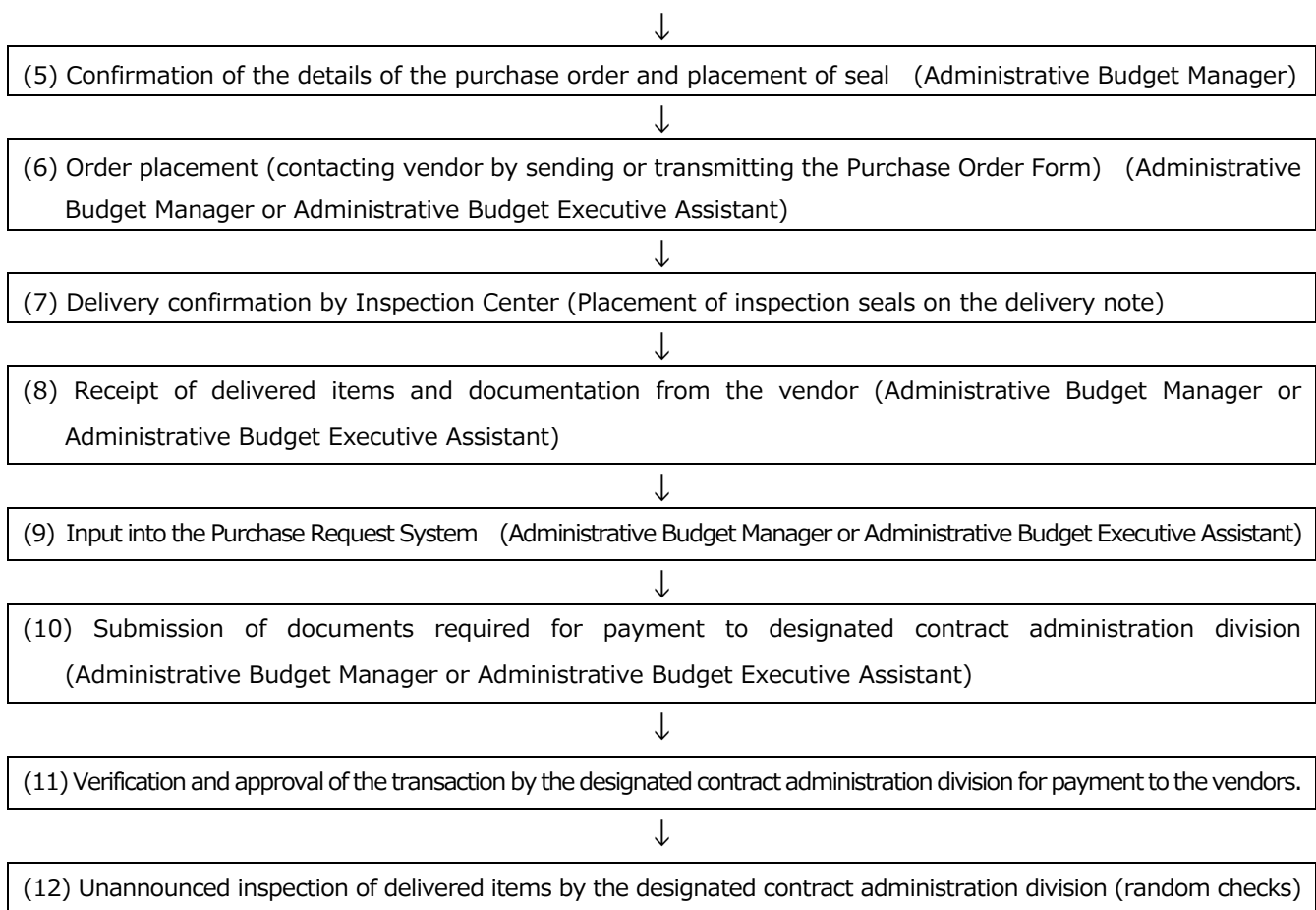
② In the case of contracts worth less than 1 million yen, the faculty member acting as Administrative Budget Manager will select the vendor, create a Purchase Order Form* (or direct an Administrative Budget Executive Assistant to do so) and, after confirming its content, contact the vendor in question to place the order. The vendor will deliver the item to the laboratory following an inspection by the Inspection Center. After receiving an invoice, etc., the Administrative Budget Manager (or Administrative Budget Executive Assistant) will use the Purchase Request System to create a Purchase Request Form and will submit it to the designated contract administration division along with the supporting documents created by the vendor. Payment will be made by the designated administration division following approval.

*The creation of a Purchase Order Form is not necessary in the following cases :

- When placing orders with a University COOP store using a COOP card
- When placing orders via the Internet or by faxing the designated form
- When using reimbursement when creation of a Purchase Order Form is difficult, such as when making urgent purchases while off campus

【Basic Flow for Orders of less than 1 million yen】





(Requests for Vendor’s Cooperation)

The Institute requests that each vendor submits a pledge containing the following statements and does not do business with vendors that do not submit pledges. In the unlikely event that a vendor has been complicit, the Institute will take steps that may include suspending business transactions with the vendor for up to 24 months, publishing the name of the vendor, and seeking compensation for damages.

【Content of the Pledge】

- We will observe all regulations, etc. of the Institute and will not become involved with impropriety.
- We will cooperate with requests such as for access to and/or submission of business ledgers during internal audits and other investigations, etc.
- In the event that impropriety is recognized, we will not raise objections, even if measures are taken which include the suspension of business transactions.
- In the event that faculty and staff members request improper conduct, etc., we will report it to the Institute.

(2) Basic Flow for the Payment of Travel Expenses

Business trips are conducted in accordance with the business and itinerary indicated by the travel assignment. After each trip, a Business Travel Report will be created, and

documentation verifying business activities will be attached. The administrator with the authority to issue travel assignments will be asked to confirm that the applicant for payment of travel expenses achieved the business that was his/her initial objective. The procedures for the payment of travel expenses to the applicant will be followed.

【Basic Flow for Administrative Procedures, Etc.】

For Business Travel (1)–(7)

(1) Planning of business trip (Administrative Budget Manager)



(2) Application of travel request to the departmental administration division (Traveler, etc.)

Note: Submission of Application for Business Travel, attached with documents verifying the content of business activities, etc. Required documents: Refer to Table 1 below.

Example of the Required Documents for above procedure:

Travel agency estimates, screenshot of online application page, travel package application or estimate, etc.



(3) Obtainment of prior approval from Travel Approver



(Business trip)

(4) Creation and collection of documentation (Traveler) Required documents: Refer to Table 2 and 3 below



(5) Submission of Business Travel Reports, etc. to the departmental administration division (Administrative Budget Manager or Administrative Budget Executive Assistant)



(6) Verification of the factuality of the travel and the validity of the travel expenses by the departmental administration division



(7) Obtainment of approval from Travel Approver



For Payment of Travel Expenses (8)

(8) Procedure for payment of travel expenses to the traveler

[Verification of the Factuality of the Business Travel]

Verification of factuality of the travel and the validity of the travel expenses by the departmental administration division (step (6) in the above flow)

Business Travel Reports are used to confirm the details (including consistency in expenses) and results of the business activities. Supporting documentation verifying the travel period, organization/event to visit (such as a conference program brochure), and business activities must be submitted. In the event that travel expenses are defrayed by the destination institution, only a Business Travel Report needs to be submitted.

Table 1: Required documents when applying for a travel request

Documents verifying the business travel

Documentation	Documents verifying the travel period, organization/event to visit, and business activities
	Documents verifying airfares and itinerary (in case of provision based on estimated amount)

Table 2: Required documents when submitting a Business Travel Report

Documents verifying the factuality of the travel

Documentation	Business Travel Report
	Documents verifying business activities

[Verification of the Validity of Travel Expenses]

Procedures for Payments of Travel Expenses to Travelers (step (8) in the above flow)

In addition to verification of travel using Business Travel Reports, the validity of the amount paid will be verified based on submission of supporting documentation appropriate for the type of travel as shown below.

Table 3: Required Supporting Documentation

Type of Travel	Method of Transportation	Supporting Documentation
Domestic Travel	Air	Boarding pass stubs (or boarding certificate), proof of itinerary and receipt (proof of purchase price)
	Boat	Receipts (excluding cases claiming the lowest class fare of the boat in which fares are categorized into classes or fares are not categorized)
	Train	Not required
	Bus	Not required for local buses. Receipts required for non-local express buses.
	Travel Package	Receipts and documentation showing a breakdown of expenses
Overseas Travel	Air	Boarding pass stub (or boarding certificate), proof of itinerary and receipt (proof of purchase price)
	Boat	Receipts
	Train	Receipts
	Bus	Receipts
	Travel Package	Receipts and documentation showing a breakdown of expenses

(3) Basic Flow for the Hiring of Student Assistants, Payment of Salary, Etc.

The procedures and payments when hiring Student Assistants as Research Assistants (RAs) to assist in research or Teaching Assistants (TAs) to assist in education are as follows.

In any case, Administrative Budget Managers who wish to hire students, must explain to the workers the details of the work and the procedures and confirm their understanding, and verify the work after its completion. After completion of the work, the worker must submit his/her attendance records, etc. to the administration division in person. Following confirmation and approval by the administration division, salary will be paid based on a bank transfer request form submitted from the worker.

【Basic Flow for Administrative Procedures, Etc.】

◎ Method for Requesting Student Assistants

(1) The faculty member decides on the work to be performed, the period and hours over which the work will be performed, and the student to whom the work will be assigned.



(2) The laboratory creates a Student Assistant Payment Application Form, inputs the application data, and sends it to the administration division. (The application data shall be transmitted.)



(3) The faculty member instructs the student to submit a Payroll Direct Deposit Request (or Request for Change) Form and an Application for (change in) exemption for dependents of employment income earner, etc. to the administration division.

*Note: However, the student's My Number must be submitted directly from the student to the Human Resources Division.



(4) The administration division delivers a Notice of Employment, etc. by hand to the worker in person.

◎ Monthly Student Assistant Work Reports and Payment of Salary

(1) The student downloads the Work report and Work Timetable form and inputs the period of employment, his/her affiliation and student ID number, etc.



(2) After confirmation of the completion of work on the day by the approver, the student inputs the start and end time of the work.



(3) After completing his/her monthly work, the student prints out the Work report and Work Timetable.



(4) The student obtains the signatures of each faculty member bearing the cost in the approver field on the Work Report.



(5) The student submits the Work Report and Work Timetable in person to the administration division of the department with which the faculty member bearing the costs is affiliated.



(6) The administration division creates the Work Hours Management Report based on the Work Report and Work Timetable submitted from the student.



(7) The administration division submits the completed Work Hours Management Report to the Payroll Services Group of the Human Resources Division.



(8) Following confirmation by the Payroll Services Group of the Human Resources Division and approval by the Accounting Division, salaries or honorarium will be paid to the worker by bank transfer.

(1) Basic Flow for the Hiring of Support Staff (Fixed-Term Staff), Payment of Salary, Etc.

The procedures for hiring support staff (fixed-term staff) and flow from the submission of monthly work reports to payment of salary are as follows :

Hiring is conducted via open recruitment of staff and reviewed by two or more persons (the hiring faculty members and administrative staff members). In addition, candidates who have worked at the Institute in the past are required to list on their resume the name of the department with which they were affiliated and the name of the laboratory where they were employed. Before finalizing the hire, the educational and work history of the candidate will be confirmed by the Human Resources Division and relevant department administration division.

Upon hiring, the newly employed support staff will submit a pledge similar to that of the regular staff members submit. In addition, the staff members in person must sign their name when receiving the staff ID card.

Each administration division, etc. will periodically organizes information exchange meetings between administrative staff members and support staff members.

As far as the procedures for hiring permanent staff, ask the administrative staff members in charge at the Human Resources Division for details when they provide information on the posting for the permanent staff recruitment several times a year.

【Basic Flow for Administrative Procedures, Etc.】

◎Method for Hiring Support Staff, Etc.

(1) The faculty member conducts an open recruitment of staff after consultation with the administration division.



(2) Two or more persons (the hiring faculty members and administrative staff members) review candidates. Before finalizing the hire, the candidate's educational and work history is confirmed.



(3) The newly employed support staff starts work. Upon hiring, he/she submits the pledge similar to that of required for regular staff members.



(4) The newly employed support staff submits required documents (pledge, Commuting Notification, etc.) directly to the administration division. The staff ID card is handed to the support staff in person by the administrative staff members in charge at the Human Resources Division.

© Monthly Work Reports and Payment of Salary for Support Staff, Etc.

(1) The support staff downloads the forms and creates a Work Attendance Record.



(2) The support staff prints out their Work Attendance Record at the end of each monthly work.



(3) The support staff obtains confirmation from his/her supervisor, and the supervisor affixes his/her seal in the Supervisor field of the Work Attendance Record. The support staff then submits it to the designated administration division.



(4) The administration division creates a monthly working hours report and submits it to the Payroll Services Group, Human Resources Division



(5) Following confirmation by the Payroll Services Group of the Human Resources Division and approval by the Accounting Division, salary will be paid to the support staff by bank transfer.



【During the Employment Period】

- The support staff is required to attend information exchange meetings. (Information exchange meetings are periodically organized by the respective administration division, etc.)
- The support staff is required to participate in mandatory training courses, etc.



(6) (only in the case of voluntary resignation) A notification of acknowledgement of resignation will be handed by the Human Resources Division to the support staff.

3. Consolidation of Administration for Purchasing Goods and Travel Expense Payments

We will centralize processing by consolidating the placement of the multiple staff members who conduct part of the accounting on behalf of the Administrative Budget Manager when implementing the education and research funds. This will allow the introduction of a system that enables verification by the multiple staff members. In addition, we will aim to lower the burden on the Administrative Budget Managers and enhance education and research activities.

Tasks of the Consolidated Administrative Staff Members

【Purchasing goods】

- As directed by faculty (Administrative Budget Manager), create Purchase Order Forms for purchasing goods, services, etc. worth less than 1 million yen, and contact vendors and assist with entries into the Purchase Request System.

【Payment of travel expenses】

- As directed by faculty (the Administrative Budget Manager), assist with entries into the Purchase Request System for Travel Request and Business Travel Report procedures, and request the submission of supporting documentation to the traveler.

【Inspection】

Inspection of purchased goods, services, etc. worth less than 1 million yen

4. Systems for Monitoring the Use of Education and Research Funds

Monitoring of the implementation of education and research funds will be conducted through the following methods from a variety of standpoints. By mutually cooperating as needed, and by gaining the cooperation of vendors and other parties, we will strengthen the whole function of monitoring.

(1) Routine Monitoring

- Routine and periodic monitoring by the Budget Manager (risk information provided from the administrative departments)
- Verification through payment procedures

(2) Monitoring by the Internal Audit Office (risk-based auditing, etc.)

(3) Monitoring by the Office for the Appropriate Management of Education and Research Funds (confirmation and analysis of the implementation status of the Plan for the Prevention of Improper Use of Education and Research Funds)

By investigating and implementing countermeasures to decrease and eliminate the risks and challenges ascertained through the above monitoring efforts, we will execute the PDCA cycle on an Institute-wide basis.

5. Holding Training Courses and Information Sessions, Etc. (Compliance Education)

We will strive to not only explain and make known the administrative procedures for accounting and the rules for applying for public research funds but also disseminate information on examples of misuse, etc. and on the responsibilities and roles of staff members involved with public research funds. Through these activities, we will increase awareness of compliance and ensure that all activities are in compliance with the Code of Conduct for Researchers, Etc., at Tokyo Institute of Technology.

To this end, we will make the attendance of or participation in training courses and information sessions, etc. and the submission of written pledges a condition for applying for or implementing public research funds, and for performing accounting work. In order to prevent improper use of funds due to insufficient understanding of the rules, we will place a FAQ on the website and establish consultation service desks.

- ◆Holding Institute-wide Training Courses and Information Sessions, etc.
Accounting administration seminars, compliance training courses, Grants-in-Aid for Scientific Research information sessions and so on are held or opened on an irregular basis.
- ◆Training courses and information sessions by the Research Integrity Officers (Conducted for each department)
- ◆Provision of Information on the Website (Initiatives Aimed at Preventing Impropriety, the Plan for the Prevention of Improper Use of Education and Research Funds, etc.)
<https://www.titech.ac.jp/english/about/policies/efforts/activities/>
- ◆Consultation on rules and procedures
Research Support Service Desk (Web Version): <http://mado.rpd.titech.ac.jp/english>
Consultation Service Desk on the Proper Use of Education and Research Funds:
Research Support Service Desk Ext. 2337
Departmental consultation service desks:
<http://keiyakuw.jim.titech.ac.jp/info/manual/tel.html> (Japanese)
- ◆For opinions and request on efforts related to management and use of education and research funds
Office for the Appropriate Management of Education and Research Funds
Email: tekisei@jim.titech.ac.jp
- ◆General Reporting and Consultation Service Desk
On-campus consultations
Address: 2-12-1 Ookayama, Meguro-ku, Tokyo
Fax: 03-5734-7697
Email: sodanmadoguchi@jim.titech.ac.jp
- Off-campus consultations (email consultations only)
Kasumigaseki-Sogo Law Offices
Nobuo Ishimura, Attorney at Law
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