Title:	*Applicable to:	Effective Date:
Employees Working on Beaumont Research Outside Their Normal Employment Duties	**Beaumont Health**	**01/12/2018**
		Last Periodic Review Date: **01/12/2018**
Policy Owner: **Administrative Director**	Document Type: **Policy**	Functional Area: **Research Finance and Billing, Research Institute**

***For This Document, Beaumont Health Includes**:
Beaumont Corporate Shared Services
Beaumont Hospital, Dearborn
Beaumont Hospital, Farmington Hills
Beaumont Hospital, Grosse Pointe
Beaumont Hospital, Royal Oak
Beaumont Hospital, Taylor
Beaumont Hospital, Trenton
Beaumont Hospital, Troy
Beaumont Hospital, Wayne
Beaumont Medical Group
Beaumont Pharmacy Solutions
Post Acute Care

I. INTRODUCTION:

Beaumont Research Institute is committed to facilitating research conducted by all disciplines at Beaumont. When employees work on research projects outside their normal employment duties (as contingent or volunteer), special considerations must be made.

For the purposes of this policy "volunteering" on research projects refers to voluntarily working on the conduct/operation of a project, rather than volunteering as a research participant or subject.

II. PURPOSE:

The purpose of this policy is to provide guidelines for Beaumont staff working or volunteering on research activities, which are outside their normal employment duties. This policy applies to all non-physician staff.

III. OVERVIEW:

On occasion, employees may wish to work on research projects outside the confines of their normal work duties, either as a volunteer or as a contingent employee. Both Business Unit 10108 (Research Institute employees, employed for the purposes of conducting or supporting research) and non-Business Unit 10108 (non-Research employees) may be allowed to work on research outside their normal work duties, on a contingent employment basis or as a volunteer, in certain circumstances and with appropriate approvals. For instance, an employee may wish to volunteer

to work on research to fulfill an educational requirement for a course of study (e.g., advanced nursing or occupational therapy degrees), or when a project is of special interest to the individual.

IV. POLICY:

A. **Working on Research Outside Normal Employment Relationship as a Contingent** Employees (Business Unit 10108 and non-Business Unit 10108, exempt and nonexempt) may work on research outside their normal work relationship only after certain circumstances are satisfied.

B. **Non-exempt**, full-time employees who work on research on a contingent basis outside of their normal forty (40) hour workweek, will be paid at a rate of one and one-half times (1.5X) the contingent hourly rate appropriate for the research work being performed, per The Fair Wage and Hourly Act. Utilizing a non-exempt employee to work on research outside their normal workweek may significantly impact the study budget, due to the increased salary expense related to payment of overtime. Generally speaking, payment of overtime to a contingent employee would be approved only when there is no one available to complete the work at regular pay and/or the employee has special skills not otherwise available within Research. Such arrangements are evaluated on a project-by-project basis. The wage expense must be identified during the study budget development phase and contract negotiations, and appropriate approvals (e.g., principal investigator, Research Administration, individual's manager and administrator, and clinical research department manager) obtained.

C. **Exempt** employees at certain salary levels may not be subject to The Fair Wage and Hourly Act. When exempt employees work on a contingent basis beyond their normal forty (40) hour work week, contingent wages for the hours spent working on research are charged to the study and reimbursed to the employee at the research straight time rate. These staffing arrangements must be identified during the study budget development phase and contract negotiations, and appropriate approvals (e.g., principal investigator, Research Administration, individual's manager and administrator, clinical research department manager) obtained. As exempt employees, individuals who work greater than forty (40) hours in their own department or on duties related to any project assigned by their manager are not working outside their normal employment relationships and are not working as contingents.

Time spent on research activities, which falls outside the employee's normal employment duties for work done during their normal employment hours, will be reimbursed from the research project-specific Dept ID or employee's home Dept ID. These staffing arrangements

must be identified during the study budget development phase and contract negotiations and have appropriate divisional and departmental approvals. No additional reimbursement, will be made to the individual for their research work completed during their regular working hours.

Time spent on research activities by employees during their normal employment hours determined to be de minimis (approximately less than 2% of their annual hours) will not be reimbursed to the home Dept ID, as efforts expended to capture and process this time would exceed value received. Appropriate notification and approval (Research Administration, individual's manager and administrator, clinical research department) will take place.

All employees being paid for research activities are required to comply with the *Research Time and Effort Reporting* by submitting Research Institute Time Logs documenting their research work.

D. **Working on Research Outside of Normal Employment Relationship as a Volunteer**
An employee may choose to work on a research project as a volunteer for an approved purpose, such as in order to fulfill an educational requirement for a program of study or because a research project is of special interest to the individual. If the employee chooses to volunteer, they are unpaid for their research work. It is essential this type of involvement in research is entirely voluntary and fully documented as such. Employees must never feel coerced to volunteer to work on research outside their normal work duties under any circumstances.

V. AUTHORIZATION:

To assure all interested parties have authorized, acknowledged, or been notified of an employee's involvement in research outside their normal employment duties, the *Authorization & Acknowledgement of Arrangements for a Non-Business Unit 10108/ Research Employee who will be Working or Volunteering on Research Activities* form (Non-Business Unit 10108 Acknowledgement Form) must be completed (Appendix A, and available on RI Website). This form documents the arrangements, including whether the employee or department will be reimbursed (contingent employment or volunteer) and if so, the mechanism to be used for reimbursement, as well as documenting the official authorizations.

1. Employees must never feel coerced to work on research as a contingent or volunteer outside their normal employment hours. The employee signs the Non-Business Unit 10108 Acknowledgement Form to formalize and document their participation on the research project.

2. The employee's direct manager and administrator must have knowledge of the employee's involvement in research work, approve any time away from regular duties during normal working hours, and understand whether reimbursement from Research Institute to the home Dept ID# will be provided. Furthermore, the employee's direct manager and administrator must fully understand the employee's commitment as well as their own, to assure research work meant to be conducted outside normal working hours does not occur during regular working hours. Also, they must confirm that research responsibilities will not conflict with regular work duties.
3. When an employee is working on research during regular work hours, they will not be paid extra for their research work, because they are already being paid by Beaumont ("on the clock"). Likewise, an employee cannot "volunteer" to work on a research project during regular working hours. Informing the employee's management of their contingent or volunteer research role lends transparency.
4. Employees must be appropriately prepared, trained and educated for their research roles. By requiring the documentation of the employee's research roles and duties, the Research Institute assesses whether the person is appropriately prepared and has the necessary educational background to perform these duties. Provisions, including additional required training and approvals, must be made. For example, individuals who will have access to patient records during the course of their volunteer or contingent research work but who do not normally have access to such information during the course of their normal employment, must acquire additional training and approval. Additionally, the Institutional Review Board is required by Federal regulations to know and approve the role of all key research personnel engaged in clinical research.
5. The clinical research department and principal investigator overseeing the specific research project involving the contingent or volunteer employee must approve their role, as they are expected to understand all expenses, including wage expenses, in order to operate within budget.
6. When a non-Business Unit 10108 staff member's job description includes research participation (very rare), completion of a Non-Research Institute Acknowledgement Form is not required. This includes advanced practice nurses, pharmacists and doctorate level-physical therapists.

VI. PROCEDURE:

An employee expresses interest in working on a research project outside their normal working duties, or a member of a research team identifies an employee they wish to work on a research project. The manager of the Clinical Trials Office overseeing the project is informed and the manager works with Research Finance & Accounting, Grants & Contracts Analyst who will

initiate completion of Part 1 of the Non-Business Unit 10108 Acknowledgement Form (Appendix A). If the appropriate Clinical Trials Office is not readily identifiable, the Office of the Administrative Director of the Research Institute is the appropriate first contact.

The Clinical Research Manager is then responsible for assuring all appropriate signatures and approvals in sections 2 through 6 are obtained before returning the Non-Research Institute Acknowledgement Form to the Research Institute Administrative Director for signature.

The Research Office Manager is responsible for double-checking signatures and approvals and providing copies to recipients listed on part 8 a-f of the Form. The Clinical Research Manager is responsible for ensuring she/he has received a copy of the completed Form from the Research Office Manager before allowing the project to commence.

VII. ASSOCIATED POLICIES AND FORMS:

RI Policy *Research Time and Effort Reporting*
RI Policy *Establishing a Research Study Budget and Management of Research Funds*

VIII. ATTACHMENTS: (see attachment tab, upper right hand corner)

Appendix A: Authorization and Acknowledgement of Arrangements for a Non-Business Unit 10108 Employee who will be Working or Volunteering on Research Activities

CORPORATE AUTHORITY:

Beaumont Health ("BH") as the corporate parent to William Beaumont Hospital, Botsford General Hospital, and Oakwood Healthcare Inc., ("Subsidiary Hospitals") establishes the standards for all policies related to the clinical, administrative and financial operations of the Subsidiary Hospitals. The Subsidiary Hospitals, which hold all health facility and agency licenses according to Michigan law, are the covered entities and the providers of health care services under the corporate direction of BH. The Subsidiary Hospitals' workforces are collectively designated as BH workforce throughout BH policies.