Investigating the Feasibility of a
Code of Business Conduct at MIT

Leader to Leader Team Project

Final Report

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Executive Summary

Leader to Leader (L2L) is MIT’s flagship leadership development program for the MIT community. L2L Fellows partner with senior leaders and MIT faculty in a proactive and systematic effort to build MIT’s internal leadership capability. L2L is a twelve-month program, offering both a theoretical leadership framework and hands-on leadership experiences. A key component of the program is the L2L Team Project. A team of 2008 L2L Fellows, sponsored by MIT Institute Auditor Debby Fisher and Director of Accounting Services and Controller Gillian Emmons, undertook a project to assess the appetite for and potential barriers to developing and adopting an institute-wide Code of Business Conduct (COC).

The methodology for conducting this assessment was focused on the development and use of an interview survey to gather input from a targeted list of key MIT decision-makers and stakeholders. Fourteen stakeholder interviews were conducted from July to September 2008. Interviewees were sent documents in advance that provided some history, context, and an example of a possible MIT code of business conduct. Interview findings were compiled, key themes identified, and prevalence of similar (and dissimilar) responses codified. Interviews were designed to address the following questions: level of receptivity to a code of conduct at MIT, possible obstacles to development of a code at MIT, and potentially effective avenues for development and rollout of a possible code at MIT.

Based on the team’s interviews of key stakeholders, the following 6 key findings were identified:

1. There is a strong perceived value of MIT adopting some form of a code of business conduct.
2. Effective faculty engagement in developing a code of business conduct is critical for successful community adoption.
3. Administrative staff are likely to be supportive of an MIT-wide code of business conduct.
4. This is a good time to move a code of business conduct effort forward.
5. Enforceability of the code is a hot button issue that requires careful consideration.
6. The absence of an obvious “owner” of conduct/ethics issues at MIT detracts from arguments of its importance and makes it more difficult to maintain and grow the effort.

Through the interviews conducted, background research of peer institutions’ codes of business conduct, an assessment of MIT’s efforts to date to develop a code of conduct, and application of essential leadership assessment tools and methods taught throughout the L2L program, the team made the following recommendations regarding the development and implementation of a code of business conduct at MIT:

1. To increase the probability of success, embed the following three principles into the process of developing and implementing a code of business conduct:
   a. Principle 1. All aspects of the code of conduct should express a positive tone aimed at being helpful, motivational, and empowering, rather than punitive or narrowly prescriptive. The code should focus on broader principles and standards of excellence that emphasize individual responsibility and judgment.
b. Principle 2. The code of conduct should aggregate excellent, existing “common law” practices, rather than present “new” rules, regulations and policies. The code should be seen as building on who we are as a community.

c. Principle 3. The code should be written in language familiar to the MIT culture. The code should avoid business and corporate language and related perspectives. The title of the code should accurately reflect its purpose and contents.

2. Partner with a faculty champion to craft and articulate a compelling rationale for why a code of conduct is needed and why it will benefit the MIT community.

3. Gain better and broader understanding of faculty thinking in the area of codes of conduct.

4. Immediately, transfer ownership of this initiative to a faculty-sponsored entity, led by a faculty champion.

5. Broker consensus among faculty and staff on key aspects of the code including: purpose of the code, range of applicability across the MIT community, and the processes for enforcement.

6. Identify a strategic unit for administrative ownership of the code that conveys its institutional priority and applicability to both faculty and staff.

The Code of Business Conduct Project offered the L2L Fellows rich opportunities for practice-based learning and application of new knowledge about change and leadership at MIT and beyond. Through this real-world experience, the L2L team learned valuable lessons and insights into important aspects of leadership including: balancing strategic, political and cultural perspectives of change; embracing and leveraging the diversity of skills and backgrounds of a project team while recognizing the power of teamwork, humility, and humor; and the importance of seeking the input of a diverse and truly representational stakeholder sample of your institution to identify effective leadership and change strategies to advance an organization’s mission.

Section 1: Our Scope of Work and Its Evolution

The original scope of work for the Code of Business Conduct project dates to February 2008, but its history can be traced a bit further back. Sponsors Debby Fisher, Auditor and Gillian Emmons, Controller, both alumni of Leader to Leader (L2L), had sponsored an L2L project in 2006 to assemble existing policies pertaining to a business code of conduct and to examine approaches to this topic by several other universities. Pleased with the foundation provided by L2L 2006, Debby and Gill sought to take the effort a step further with the help of an L2L project group in 2008. They prepared a scope of work that outlined three key objectives for the 2008 Code of Conduct (COC) project: 1) To compile standards of business conduct for MIT; 2) To prepare senior administration for adopting a COC; and 3), in keeping with the leadership development goals of L2L, to foster an appreciation for developing collaborative work products at MIT (see Appendix A for the original scope of work for this project).

Before our first project team meeting with our sponsors in March 2008, a development took place that would require significant modification to the scope of work.
In December 2007, MIT was notified that a federal grant to be received by an MIT faculty member in summer 2008 would trigger a new federal requirement for having a code of business conduct in place. The Federal Acquisition Regulations (FAR) stated that when grants greater than or equal to $5M were awarded, there must be a code of conduct and a hotline communicated and operating. This required specific action on a more accelerated timeline than our L2L project, and precipitated significant activity by our sponsors to prepare an appropriate coordinated response.

Extended conversations with senior administrators throughout spring 2008 were necessary to sort out the Institute’s response to FAR. During this period our L2L team sought to redefine the scope of our project in a way that would be both useful to our sponsors and to the Institute at large, and would provide a constructive leadership learning experience for team members. Over the course of these months, in close collaboration with our sponsors, who led the FAR group and facilitated our team’s engagement with the FAR process, our team rearticulated our scope of work several times. An early revision to the scope of work focused on the development of an implementation plan for an Institute-wide code of conduct that would grow out of work done by the FAR team (see Appendix B for this interim revision).

In May, the FAR group resolved its deliberations and developed a plan to respond to FAR through internal processes centered on the specific projects that would trigger FAR jurisdiction. Two COC team members attended a May 22 meeting among senior leadership, our project sponsors, and several key administrative staff where both short and longer-term COC possibilities were discussed. Our project sponsors concluded from this discussion that an Institute-wide COC would be useful, and that significant concern existed within senior administrators and administrative staff regarding how difficult it might be to implement an Institute-wide COC. In response, we crafted the final scope of work for our project to assess the appetite for, and potential barriers to, an Institute-wide COC (see Appendix C for team meeting notes on June 6, 2008 documenting our final scope of work discussion).

Section 2: Methodology

2.1. Method Development

We began discussions on project methodology as soon as our project team was convened in February 2008 with the original scope of work. Our initial methodology was designed to discover the most effective ways in which a business code of conduct might be understood, communicated, and adopted by the various administrative and faculty constituencies at MIT.

After several team sessions discussing the possible methods to gather and distill information, we decided that gathering information through a series of well-designed, scripted interviews would be a reasonable approach.

This would involve seven steps:
1. Build a survey that contained a mixture of subjective (non-quantifiable) questions aimed at getting the participants’ initial reactions to the concept of a COC, and some objective (quantifiable) questions to allow us to correlate the strengths of responses concerning dissemination and communication approaches.

2. Identify three lists of prospective interviewees, one each for three major constituencies at MIT: senior leadership, faculty, and administration. Have our sponsors review and modify the lists.

3. Send the agreed-upon interviewees a package of preliminary information for review, including the interview questions and a sample COC.

4. Complete the interviews and aggregate the information collected.

5. Review the survey information, identifying areas of agreement and disagreement within and across constituencies.

6. Assess relevance of information collected, looking for important major themes that indicate:
   a. Level of receptivity to COC at MIT,
   b. Possible obstacles to development of COC at MIT
   c. Potentially effective avenues for development and rollout of possible COC at MIT

7. Report on findings and recommendations

The planning stage for our project focused on two major areas: 1) development of interview questions and 2) identification of key stakeholders. We saw the development and consistent use of a carefully constructed set of questions as key to collecting reliable, quantifiable information during interviews. Our goal was to collect interviewees’ reactions to the possibility of an MIT-wide COC, and to assess their thinking about potential ways to conceive of, develop and roll out a potential code. With that in mind, we created a set of questions that attempted to minimize ambiguity about key concepts and ensure consistent understanding across the various interviewees. We also developed a few open-ended questions that encouraged creative thinking by the interviewees. The questionnaire went through several revisions before we settled on a final version.

We also developed a draft list of key high-level stakeholders who should be interviewed by our team, working in pairs. Our sponsors reviewed our interview questions, list of potential interviewees and approach to the interview process. The questionnaire and process were approved. The list of potential interviewees was amended: faculty were removed. In the end, the list of interviewees consisted essentially of administrative and senior management.

At the request of our sponsors, our research did not begin until the FAR team had completed a draft COC for the FAR project and presented it to members of MIT’s senior leadership for review. During that review at the May 22 meeting, it was decided that while the proposed COC was laudable, it was not the
right moment to communicate it to a larger audience, especially faculty. Senior leadership determined that the COC needed for the FAR should be a much shorter set of guidelines that merely summarized existing MIT policies. Debby Fisher subsequently developed a shorter version that aggregated existing MIT policies, and the proposed, more detailed COC was temporarily shelved (see Appendix D for the “minimalist” version of a COC). As a result, our project scope, questionnaire, and interviewee list needed modification.

The May 22 meeting was an important juncture in our project planning. At this point, we had half our project time left and had not yet begun data collection. In light of developments with the FAR project and our shrinking time line, we reduced the number of interviewees and shortened the questionnaire to five subjective questions:

1. Did you have a chance to review the materials that were sent? (COC as a summary of key policies and questions)
2. Do you believe that a university-wide COC such as the one provided would have demonstrated value here at MIT? Please explain.
3. What potential obstacles, if any, do you think might be involved in rolling out/gaining acceptance for a COC at MIT? (Ask for ways in which those obstacles might be overcome.)
4. In your view, what reaction to a business COC might be expected from the following constituencies?
   a. Administration
   b. Faculty
   c. Senior leadership
5. Are there other stakeholders that you feel would have valuable perspectives to provide on this topic?
6. Is there anything else you would like to add that we have not covered?

We were able to send to our interviewees the condensed COC prepared by Debby Fisher, which restated some of the key policies in the one document (see Appendix D for the condensed COC). Sending this “minimalist” version gave the interviewees something concrete and specific to review. Having the “minimalist” version as part of our interview protocol let us begin to judge the acceptability of a succinct re-statement of MIT policy for possible roll-out across campus—even if only in compliance with the new FAR requirement. We discussed a broader code of conduct with our interviewees in hypothetical terms that were not scripted. Thus, responses from the interviewees to a "non-minimalist" version were somewhat more difficult to pin down, as they may have varied depending on how interview teams described it and on how interviewees imagined it.
2.2. Data Gathering and Analysis

We divided our team into three interview pairs. The team approach to the interviews ensured effective documentation as well as the capability to confirm and cross-check interview data. In total, the COC project team completed 14 interviews from late July through early September.

After the interviews were complete we:

1. Organized the responses in a spreadsheet matrix that summarized major points provided by interviewees;

2. Compared interview responses among teams and identified major themes across the full set of interviews;

3. Applied 3 lens thinking to those major themes and to reflections on our process;

4. Based on the major themes and on our interview experiences, brainstormed and distilled recommendations on possible ways forward for a successful Institute-wide COC within the MIT context.

Section 3: Findings

All statements included in this section are anonymous unless interviewees specifically indicated their consent to have their identity shared. The number of interviewees whose statements supported specific claims below is characterized as follows: “a few” includes the range of 3-5 interviewees, “about half” includes the range of 6-8 interviewees, “most” or “a majority” includes 9-11 interviewees, and “nearly all” includes 12-13 interviewees.

3.1 There is value in pursuing a COC.

- Opinions differ on ideal scope and purpose.
- Language used to title, define, and “sell” a COC sends important signals and should be treated with sensitivity.

All interviewees indicated that they found some version of a COC valuable. Most stated that it was “the right thing to do” and/or that MIT should be a leader in ethical conduct. Discussion during interviews centered primarily on two versions of a COC: a “minimalist” version prepared by Debby Fisher that compiled key policies (see Appendix D) and a “broad” version. To help make this contrast clear, teams described the “broad” version as a document that would be distinctively different from the minimalist version in terms of its applicability across the MIT community, its content, and/or its intention. Nearly all were comfortable with the deployment of a “minimalist” version for the current, limited purpose of compliance with FAR. The minimalist version was generally accepted as useful simply as a compilation of existing policy;
however, a few interviewees also noted that even a “minimalist” version might raise the sensitive issue of enforceability (see section 3.5 below).

A few wanted a general, overarching statement to serve as a preamble to the compilation of policies represented in the “minimalist” COC. One also noted that several of the policies included in the minimalist version are outdated and that there are conflicts between some of the policies included. These observers suggested that at some point a careful review of the existing policies would be necessary.

About half of the interviewees saw value in developing a COC with enough specificity to give MIT employees guidance in the wide range of ambiguous situations they encounter on daily business. Two interviewees provided the specific example of a policy regarding use of Institute computers for viewing inappropriate (e.g., pornographic) websites. A few interviewees briefly considered a detailed COC with us, but quickly became concerned that such a code would be unappealing to several segments of the MIT community, including faculty, and difficult to enforce (see discussion of enforceability in section 3.5 below).

About half of the interviewees emphasized that the terms “code,” “business,” “conduct,” “ethics” and others were likely to be charged terms for key constituencies (i.e., faculty).

3.2 Effective faculty engagement in developing a COC is critical for successful community adoption.
• A rationale for the COC that is clear and compelling to faculty must be developed.

Every interviewee emphasized that faculty participation and support are fundamentally necessary for a COC to be successfully adopted in the MIT community. About half of the interviewees believe that faculty would reject a COC that was developed without their input.

When asked if gaining faculty support would be difficult, a few interviewees indicated that they believed it would be challenging. Specific concerns that were mentioned were that faculty could see a COC as unnecessary, insulting to their intelligence, and/or as an effort to assert administrative control. (Note here and elsewhere that this should be seen as a testable hypothesis rather than conclusive fact, since faculty were not consulted.) Interviewees noted that faculty involvement would be important in both code content development and code rollout.

Most interviewees believe that a positive approach to a COC is likely to be more effective than an approach that could be perceived as punitive or intimidating. For example, a rationale seeking faculty participation in developing a COC could be worded in terms of how the COC can help address ambiguity, or how it can help protect MIT’s intellectual capital. Additional suggestions for enrolling faculty in this effort include connecting this effort with the ongoing
faculty committee working on conflicts of interest, and having the effort led by a strong faculty advocate such as Steve Lerman.

3.3 Administrative staff are likely to be supportive of a COC.

When asked how they believed administrative staff at MIT would respond to a COC, most interviewees indicated that they expected few, if any, objections from administrative staff. Some staff would be likely to find a COC helpful in their work by providing a central source for information on various behaviors, and by clarifying how to approach ambiguous situations.

One proposed rationale for a COC seems to be particularly compelling for certain administrative audiences: the increasing scrutiny of higher education institutions by government. MIT Senior Counsel Greg Morgan indicated that members of Congress have begun to seek a greater level of accountability from colleges and universities with very large endowments. Scrutiny has focused to-date on Harvard, Yale, Princeton and Stanford, but in Morgan’s view it is just a matter of time before MIT receives similar attention. He firmly believes that MIT would be much better off to have a code of conduct in place prior to any governmental review or audit.

3.4 This is a good time to move a COC effort forward.

At least two reasons were given for why work on a COC should be intensified during the 2008-09 academic year. The first is associated with Greg Morgan’s rationale related to governmental scrutiny: in his view, it is likely that some review of universities in MIT’s peer group will take place within the next year or two. Morgan also indicated that President Hockfield is interested in near-term progress in this general area. Senior leadership is increasingly becoming aware of this issue, in part due to the work of the L2L 2006 project team, Steve Lerman’s *MIT Faculty Newsletter* article, the FAR requirements, and Debby Fisher and Gillian Emmons’ ongoing efforts. The convergence of these separate activities leads us and about half of our interviewees to believe that the time is now ripe to move forward on this initiative.

A second reason is associated with the existence of other related faculty- and staff-led initiatives. For example, a faculty committee is currently working on conflict of interest issues (see Appendix E). This provides a potential opportunity to build on the momentum of the existing group. Another example is a physics professor who has worked recently within his own department to create a “covenant” to articulate how members of this community will treat each other. Enlisting this faculty member and his colleagues could also help build momentum.

3.5 Enforceability is a hot button issue that requires careful consideration.

Enforceability appears to be the issue that raised the most divergent opinions in our research.
A few interviewees noted that giving a COC a higher profile could suggest that the Institute was seeking to increase enforcement of the array of policies contained in the COC. Paraphrasing the words of one interviewee, there seems little point in creating an Institute-wide COC if it won’t have any “teeth”; to this individual, in other words, simply packaging and rolling out existing policy would reflect little or no difference from the status quo.

However, a majority felt that making enforcement an explicit or implicit aspect of a COC could contribute to alienation and/or resistance, particularly in the absence of faculty engagement. In addition, one felt that some of the code (i.e., existing MIT policy) is anachronistic and difficult to enforce. Another observed that requiring enforcement would entail significant costs for the human resources necessary for creating and maintaining a credible enforcement infrastructure.

A more moderate alternative to the prescriptive approach (favored by two interviewees) is one that contextualizes expectations within the realm of what is “reasonable.” This approach, suggested by one respondent, explicitly recognizes that everyone at MIT seeks to be professional in their conduct at and on behalf of the Institute. From this perspective, business conduct is characterized more by shades of gray than by black and white, and an appropriate COC is a set of reasonable guidelines that seek to educate and inspire rather than a compendium of rigid rules designed to discipline.

3.6 The absence of an obvious “owner” of conduct/ethics issues at MIT detracts from arguments of its importance and makes it more difficult to maintain and grow the effort (i.e. through annual publicity, training, etc).

The policies in the “minimalist” code hail from several different parts of the Institute; thus, building awareness of and responding to questions about individual policies are left to individual units. There is currently no single sponsor for a centralized code, and one interviewee noted this is a distinct problem. According to a few interviewees, a code that indexes policies from around the Institute needs a central body to serve as that code’s “home.” This “home” would ensure and enable actions such as review and updating of policies as necessary, make the community aware of them from year to year, and address and/or triage related questions and issues as they arise.

Section 4. Guiding Principles and Recommendations

4.1 Principles to Guide Development of the Code and Its Campus-Wide Implementation

Our analysis of the stakeholder interviews revealed several key insights that led us to the development of three important principles – principles that should be considered when further developing the code of conduct and the subsequent policy roll-out activities. We feel that if these principles are reflected in
both the content of the document itself and the roll-out process, there will be a higher likelihood the effort will be well received by the MIT community.

**Principle 1.** *All aspects of the code of conduct* (its development, content, and rollout) should express a positive tone; they should aim at being helpful, motivational, and empowering, rather than punitive or narrowly prescriptive. They should focus on broader principles and standards of excellence that emphasize individual responsibility and judgment.

**Principle 2.** The code of conduct should aggregate excellent, existing “common law” practices, rather than present “new” rules, regulations and policies. The code should be seen as building on who we are as a community.

**Principle 3.** The code should be written in language (including the vernacular) familiar to the MIT culture. The code should avoid business/corporate language and related perspectives. The title of the code should accurate reflect its purpose and contents. “Standards of Community Practice” would perhaps be more appropriate than “Code of Business Conduct.”

### 4.2 Recommendations for Developing and Implementing a Code Campus-Wide

**4.2.1. Partner with a faculty champion to craft and articulate a compelling rationale for why a code of conduct is needed and why it will benefit the MIT community.** A compelling rationale will need to be articulated to enable faculty to champion the effort, as well as obtain broad adoption across both the faculty and staff communities. The rationale should reflect the principles above as well as convey a sense of urgency and the opportunity for leadership to take MIT ahead of the curve (both in practices and regulations). The rationale should lay out clearly what problem(s) are we solving, what we are getting ahead of and why, and why faculty should care.

**4.2.2 Gain better and broader understanding of faculty thinking in the area of codes of conduct.** As earlier indicated, our research did not seek to capture faculty insight. Based on the information that we did collect from administration and senior leadership, it is clear that they believe the success of any code would require deep faculty ownership and buy-in. Therefore, it is recommended that a follow-on round of fact finding from faculty be done (by faculty and staff) to learn more about faculty’s level of accessibility to and interpretation of policies concerning decisions they make, as well as their broader interests in and concerns about a code of conduct.

**4.2.3. Immediately, transfer ownership of this initiative to a faculty-sponsored entity, led by a faculty champion.** Establishment of a faculty task force charged by the President or Provost to move this effort forward should be a priority. Developing an MIT-wide COC offers an excellent opportunity for our senior administrative staff to partner with faculty; however, our research suggests that the process needs to be presented and perceived as a faculty-supported and led activity. A staff and faculty partnership will ensure that concerns of their respective (on both
sides of the house, so to speak) are shared and understood. The FAR effort to date could serve as an excellent launching pad for this faculty-led phase, which should begin soon in order to build on the momentum from the various related initiatives already being developed across campus (see section 3.4).

4.2.4. Broker consensus among faculty and staff on key aspects of the code. Reaching consensus on key aspects of the code is critical: on the intended purpose of the code, its range of applicability across the MIT community, and the process(es) for enforceability/compliance. As the findings indicate, there are divergent views among interviewed stakeholders as to whether the code should be enforceable or not, and what consequences (if any) would be meted out if standards of conduct were not upheld. Identifying and building consensus on the right level of specificity regarding appropriate (and inappropriate) conduct will be crucial for identifying a shared vision of what the code will be and how it will be communicated between administrative and faculty constituents.

4.2.5. Identify a strategic unit for administrative ownership of the code that conveys its institutional priority and applicability to both faculty and staff. To be broadly recognized and adopted, the code should come under the aegis of a high-level office that has legitimate influence over both faculty and staff, but is not perceived as wielding authority in legal matters or issues of compliance. Distinctions should be made among different offices for different roles and responsibilities related to management of the code. Different roles and responsibilities can include the “public face of the code,” administrative oversight, secretariat functions, compliance management and enforcement actions.

Section 5: Reflections on Our Scope and Methodology

5.1 Insights from the Three Lenses of Organizational Change

In considering how best to tackle reporting and presentation of our team project results, we reflected on the lessons, insights, and tools that we had accrued over the past year as leadership students. We opened our professional tool kits to re-assess management and leadership techniques, and leadership models (for example, the “Four Cs Model of context, change signature, catalyzing, and credibility” and the Distributed Leadership Model). We revisited tools for stakeholder mapping, scenario planning, strategic thinking, and vision building, among others. These rich resources had fundamentally shaped the design and execution of our methodology in the most strategic, effective, and efficient manner possible, and they would, it seemed, be equally useful in helping us interpret and deliver the results.

Our reflections, however, led us to a fundamentally different conclusion. Our “strategy-centric” methodology, while useful in some ways, was ultimately limiting. This prevailing perspective had shaped the questions we asked, the data we collected, and had begun influencing how we interpreting the data. We had approached our project as if MIT were a mechanical system where pure
strategic planning and design could be used to bring about a defined set of goals and objectives. When we were exposed to Van Maanen’s “three lenses” framework, about midway through our analysis of the data, we realized that our approach had included “strategic” thinking but entirely omitted two other key perspectives that could have provided us with valuable information on shaping, implementing and analyzing the results of our work: the perspectives of political power and organizational culture. If we had been cognizant of the “three lenses” framework earlier, it might have altered our approach. We use Van Maanen’s “three lenses” here to reflect further on our own methodology.

5.1.1 Strategic Design Lens

As diligent students of leadership, we embarked on our team project seeking to accomplish our defined goals by designing the most rational and strategic methodology possible. We considered a preliminary environmental scan to understand our project’s context; we identified our stakeholders and mapped them to our objectives; we contemplated our approach’s strengths, weaknesses, opportunities and threats; we matched the appropriate skills of our individual team members to fit the tasks at hand; and at all times we strived to think and act strategically.

We were convinced that a rational, well-planned and coordinated methodology (a strategic design) would lead us to a successful outcome, for both our sponsors and ourselves. This lens was, from the very beginning, securely in place.

5.1.2 Political Lens

At the outset, our chosen “strategy-centric” methodology and choice of stakeholders to be interviewed did not incorporate a political perspective of the challenge. Had we considered the political dimensions of the MIT community, we would have examined the interplay of power and stakeholder interests in order to determine the best course of action. If our project team were to consider the development and implementation of a COC across the Institute as a contest of power (and perceived power) – a contest pitting administrative interests against faculty interests – we would have more quickly recognized the importance of the faculty perspective on adopting a COC. The strategic approach we constructed early on in our project did not consider the faculty’s role in policy making (and policy adopting), nor the sensitivity of senior administrative leadership to the faculty’s role. Had we considered more explicitly the political context – how power affects action and outcome – we would have been better equipped to understand who has power at MIT to affect change, what is the balance of power between faculty and administration, and which specific political points of leverage to consider when developing and rolling out a COC.

5.1.3 Cultural Lens

While examining the political dynamics at MIT more explicitly would have provided an additional richness and strength to our methodology, understanding change at MIT through a cultural perspective would have provided insight into more subtle and possibly more powerful influences on campus. Assessing the feasibility of adopting a code of conduct at MIT through a cultural lens would illuminate
the collective thinking, traditional practices, and norms that exist across MIT and, in this instance, might serve to foster or hinder organizational change. We came to realize that understanding these often subtle cultural influences is key to obtaining a more complete picture of the context of change at MIT.

Applying a cultural lens as we developed our methodology might have enabled us to better understand several important dynamics we ultimately uncovered in our team work: 1) the perceived power asymmetry between faculty and administrators, 2) a common reluctance among some staff to engage faculty, 3) differing perceptions among staff and faculty regarding the rationale for adopting a COC at MIT, and 4) a wide range of opinions about whether a code at MIT should be enforceable or not.

A better understanding of the existence and power of cultural influence would have shaped the design and content of our methodology to dig into uncovering the key cultural leverage point or obstacles.

In sum, we recognize at the close of our team project that while each of the three perspectives (strategic design, politics, and culture) offers - in its own right - a valuable and reasonable set of tools to understand change at MIT, one must incorporate all three perspectives to get at the root of any challenge. Not incorporating all three perspectives in your methodology may leave your process dangerously vulnerable to false starts, conflict, and misunderstanding, particularly if your aim is to bring about significant change. We are fortunate to be able to call attention to these important political and cultural influences in our final recommendations.

5.2 Strengths and Limitations of our Methodology

5.2.1 Context of Methodology Development and Modification

We quickly discovered that our team members represented a wonderful diversity of skills, from experience with quantitative and qualitative research to strong facilitation skills to a broadly shared, well-developed sense of humor. These capabilities enabled us to rapidly gel into a well-functioning team.

The original project plan was envisioned to require the full seven months available for project work, including time for follow-up visits to our interviewees for clarification and for checking with them on recommendations. We also held some time in our schedule for visits to additional stakeholders that might have been identified by the original interviewees. The delayed start (discussed in section 2) required several rounds of adaptation and modification within short periods of time, and significantly altered the original research plan.

5.2.2 Methodological Strengths

The evolution of the project scope of work required us to leverage our team’s combination of creative and analytical skills as we modified our methodology.

Our team’s creative skill set ensured that we explored numerous possibilities for approaching our project. We discussed many ideas at the outset and during the process of refining our scope throughout
the spring and summer. Our analytical skill set provided a "forcing function" to down-select from the possibilities and move the methodology toward a concrete choice. In reflecting on these aspects of our team dynamic, we note three ways in which they appear to have strengthened our project work:

5.2.2.1. Disciplined interviewing practices: The team carefully discussed our interview questions, how we would ask them, and what types of follow-up questions would be important. This discipline was important in our ability to gain useful information on building and rolling out a COC.

5.2.2.2. Quality of the questions that we asked and the responses we attained: The time spent developing and refining the questions paid off in a high degree of shared understanding of the questions and high capacity to judge the responses effectively.

5.2.2.3. Diligence in organizing and analyzing the data to find the common threads: In our first step in data analysis, we identified, summarized and organized key points from each interview and discussed them in depth as a team to identify major themes.

5.2.3 Methodological Limitations

One major limitation in our methodology should be kept in mind when interpreting our results: the limited scope of our sample. The interviewee pool was primarily made up of senior administrators who were engaged in the FAR conversations to some degree. The limited scope of our sample was necessary due to the practical nature of the project, but by definition this means that our findings must be interpreted as largely the perspective of informed senior administrators, not of the campus at large.

Section 6. Reflections on Team Leadership Learnings

As we reflected on our team project experience, we discussed at length whether or not we should or could have sought to overcome the one major limitation in our methodology. We noted with interest that despite numerous conversations within main L2L sessions regarding the importance of faculty to all Institute activities, we did not press the issue with our sponsors when we were asked to limit our sample to informed senior administration. We became aware late in the project that this limitation could be explained by using the political lens to view the overall context of the COC discussions at MIT, and we discussed the possibility that earlier sensitivity to this lens might have altered our course. Hindsight is 20/20! We all acknowledge that this late recognition precipitated perhaps the most significant learning of our project experience – to be mindful of which lens may be dominant, and to always question that.

The leadership process within our team was shared, and situational. We collectively lead the sessions when we were together. The different talents of our individual team members rose to the occasion when needed. The key skills that emerged were creativity, organizing, risk taking, and time management. When creativity was needed for ideas on methods, and presentation of information, the creative artistic team members stepped in and lead the ideation. When we got off track and order was required, one of our organizers would go to the white board and begin scribing the key points of conversation to get our attention back. Sometimes more than one person was trying to make a point
simultaneously. These events would inevitably trigger an appropriate response; someone would step up and bring us back on task politely by going to the whiteboard and paraphrasing what had been said. This got us all on the same page again. When the project timeline became shortened, one team member made sure we all committed to weekly, and then bi-weekly, meetings to keep the project moving forward. The team exhibited active listening skills, making sure each opinion and conclusion was heard, and that no ideas were overlooked or unfairly dismissed. In our first weeks together we put together a team charter. The very act of doing it together brought us together to place of share understanding for and commitment to our goal. Our commitments to one another, to our team, were ingrained in our minds for the duration of the project. We lived by them even though we never pulled them out after our second or third meeting.

Our conscious facilitation at team meetings also became a non-issue. At each meeting a facilitator emerged from the team to keep us on task and make sure all ideas and comments were heard and understood. Typically, another member took on the role to document our discussions and the follow-ups from the session.

In sum, our project team was a self-directed, collaborative and supportive group that adapted quickly to the changing scope and timeframe for our project. The situational needs that arose were matched by our collective skills and self-awareness. We each had enough confidence in ourselves and our teammates to feel secure that we would jump in as needed to put our specific skills to work and arrive at a solution.
Appendix A: Original Scope of Work for L2L 2008 Business Code of Conduct Project Team

Original Scope of Work – February 2008

Rationale

Institutions of higher education are following the lead of industry counterparts in recognizing the value of a clear articulation of expected standards of business conduct and ethical behavior. MIT has many good policies and procedures governing ethical conduct of the business of MIT; a code, or standards of business conduct would be a useful tool for easy reference to these. The L2L Fellows can apply their learnings by creating a code of conduct “framework”, incorporating existing policies and procedures, and support senior administration in developing an overarching core values statement.

Project Objective

• Preserve, validate and supplement the value of work performed by the L2L 2006 sponsored project, “Foundational Work in Support of a Potential MIT Code of Business Conduct”, by compiling Standards of Business Conduct for MIT
• Help and prepare senior administration for adopting and issuing Standards of Business Conduct, including a statement of core values, considering cultural, strategic and political implications for the MIT community
• Develop an appreciation for the processes attendant to developing collaborative work product at MIT

Major Deliverables

• A compilation of existing policies and statements of business conduct and ethical behaviors into Standards of Business Conduct for MIT, to be considered a draft for discussion with senior advisors
• A summary analysis of areas not covered or gaps, inconsistencies or conflicts in existing policy or statements, based upon an understanding of MIT’s and higher education’s history of business and ethical misconduct
• A recommendation to senior administration for: adopting a statement of core values within which the Standards are intended to operate
Appendix B: Revised Scope of Work for L2L 2008 Code of Business Conduct Project Team

Revised Scope of Work – April 2008 (major changes highlighted)

Rationale

Institutions of higher education are following the lead of industry counterparts in recognizing the value of a clear articulation of expected standards of business conduct and ethical behavior. MIT has many good policies and procedures governing ethical conduct of the business of MIT; a code, or standards, of business conduct would be a useful tool for aggregating and providing easy reference to these. The L2L Fellows will work closely with the FAR Task Group to support senior administration in developing an implementation plan for carefully articulating Standards of Business Conduct and ensuring community involvement in the process of their refinement and adoption. The L2L Fellows will also provide recommendations for developing an overarching core values statement, if warranted.

Project Objective

• Preserve, validate and supplement the value of

  1. work performed by the L2L 2006 sponsored project, “Foundational Work in Support of a Potential MIT Code of Business Conduct” and
  2. work performed by the FAR Task Group by considering the implications of this work on the eventual adoption of Standards of Business Conduct for MIT.

• Make recommendations to senior administration for refining, adopting and issuing Standards of Business Conduct, considering cultural, strategic and political implications for the MIT community

• Develop an appreciation for the processes attendant to developing collaborative work product at MIT

• Ensure clear connectivity with ongoing work of the FAR Task Group

Major Deliverables

• Recommendations for finalizing and integrating Standards of Business Conduct into the MIT community behavior and culture. These recommendations will take the form of a draft implementation plan based on information/perspectives collected from key MIT stakeholders (departments, divisions, administrative
offices, student governance, faculty, etc.) and might address, in varying degrees, the following key areas:

- **Content**: Refining and finalizing Standards of Business Conduct that will ultimately be considered by senior administration
- **Communication**: Rolling out Standards and building awareness and buy-in among community
- **Education**: Designing and implementing orientation/training program(s)
- **Compliance**: Facilitating assessment and ensuring adherence

- If suggested by data collected during our research, provide a recommendation to senior administration (via FAR Task Group) for finalizing an overarching statement of core values within which the Code is intended to operate
Appendix C: Excerpt from Team Meeting notes, June 6, 2008, regarding final Scope of Work for L2L 2008 Code of Conduct Project Team

How can our L2L project team be most helpful to Debby and Gillian?

- We could get input from key stakeholders around the questions:
  - Should the Institute work on a broader code?
  - Is it important to do something beyond the FAR code (e.g., something richer)?
  - Is it worth it? Is this something we (the Institute) should spend time on?
  - How can we test the assumption that it’s going to be a big effort to get a broader code adopted by the Institute?
  - Should the Institute work on a broader awareness program for the minimalist code?
  - Who else should we talk to?
Appendix D: “Minimalist” Version of Code of Conduct, prepared June 27, 2008 by Debby Fisher

DRAFT - Code of Business Ethics and Conduct

Respect for Others – As stated in MIT policy, [http://web.mit.edu/policies/9.1.html](http://web.mit.edu/policies/9.1.html) - “All members of the MIT community are expected to conduct themselves with proper respect for one another and for each other’s property. The Institute fosters the attitude that every person brings unique qualities, talents, and dignity to the community and that every individual deserves to be treated, judged, and accorded both common decencies and all the benefits of society in an evenhanded and respectful manner.”


Research Conduct, including Promoting the Highest Standards of Objectivity, Openness, and Honesty From: [http://web.mit.edu/policies/10.1.html](http://web.mit.edu/policies/10.1.html) - “Unethical behavior in research and scholarship strikes at the heart of the scholarly and educational enterprise. A shared understanding of expectations and responsibilities is, therefore, critical— not only to the quality of the research enterprise but also to the collegial life of this community.”

Refer also to: [http://web.mit.edu/vpr/www/misconsup.html](http://web.mit.edu/vpr/www/misconsup.html)

Commitment to the Health and Safety of the Community, including Environmental and Workplace Safety — “MIT's environmental programs provide crucial links between our administration's strong environmental commitment, our thought leadership in environmental research and education, and the numerous initiatives and operational activities - such as the EHS Management System - that enable us to deliver on our pledge to protect both the environment and our community's health and safety.”


Conflict of Interest/Conflict of Commitment – “The Institute's concern with conflict of interest has grown with the increasing complexity of our society, the variety of our relations with each other and with outside institutions, and a heightened national sensitivity to these issues. In response to these concerns, the Institute has adopted the following statement of policy: It is the policy of the Institute that its officers, faculty, staff, and others acting on its behalf have the obligation to avoid ethical, legal, financial, or other conflicts of interest and to ensure that their activities and interests do not conflict with their obligations to the Institute or its welfare. Essential to effective administration and adherence to this policy are a) disclosure of outside activities and interests to designated Institute officers, including financial interests, that might give rise to conflicts; and b) readily available advice and counsel to individuals and to Institute department heads on any situation.”
Financial Transactions and Internal Controls –

A. Procurement Code of Ethics - “Personnel involved in the acquisition function are in a position to provide or withhold substantial business from suppliers who serve the Institute. They constantly operate under pressure from conflicting sources and must have a highly developed sense of professional ethics to resist these pressures in order to serve the Institute in an honorable way.

To strengthen ethical awareness, and to provide guidelines for its members, the National Association of Educational Buyers has established a code of ethics referred to below, and is to be observed by all personnel who are involved in the acquisition function.”

Please refer to: http://controllers.mit.edu/site/policies_procedures, Controller’s Accounting Office Policies and Procedures.

B. Procurement policy on Gifts and Gratuities - “Institute policy prohibits Institute employees from accepting personal gifts or gratuities of any kind from suppliers. This includes the use of property or facilities, gift certificates, entertainment, or other favors of value extended to employees or their families.”

Please refer to http://web.mit.edu/policies/7.9.html

C. Travel Reimbursement - “The basic policy guiding travel expense reimbursement is that the individual traveler should neither gain nor lose personal funds as a result of travel assignments and that these assignments be planned so that their cost will not exceed budgetary limitations. Thus each traveler is to be fully reimbursed for all necessary and reasonable expenses incurred in connection with travel on Institute business, but should make efforts to keep all expenses at a reasonable minimum.”

Please refer to http://web.mit.edu/policies/7.8.html, Travel at Institute Expense

Respect for Property, including Intellectual Property – “The prompt and open dissemination of the results of M.I.T. research and the free exchange of information among scholars are essential to the fulfillment of M.I.T.’s obligations as an institution committed to excellence in education and research. Matters of ownership, distribution, and commercial development, nonetheless, arise in the context of technology transfer, which is an important aspect of M.I.T.’s commitment to public service. Technology transfer is, however, subordinate to education and research; and the dissemination of information must, therefore, not be delayed beyond the minimal period necessary to define and protect the rights of the parties.”
Please refer to:


http://web.mit.edu/tlo/www/community/guide1.html#1.0

**Use of Institute Resources** –

A. **Use of Institute Name** - “The Institute's name must not be used in ways that suggest or imply the endorsement of other organizations, their products, or their services.”

   Please refer to [http://web.mit.edu/policies/12.3.html](http://web.mit.edu/policies/12.3.html)

B. **Use of Institute Letterhead** - “Use of the Institute letterhead for personal or professional correspondence occasionally causes embarrassment or could subject the Institute to liability, since communications using the Institute letterhead sometimes are assumed erroneously to be official Institute statements. Institute or departmental letterheads should be reserved for correspondence regarding Institute affairs. Personal professional correspondence should not carry the name of the Institute, but may list a room number at 77 Massachusetts Avenue as a return address.”

   Please refer to [http://web.mit.edu/policies/12.4.html](http://web.mit.edu/policies/12.4.html)

C. **Use of MIT’s Computers, Networks and Telephones** - “MIT’s computers, networks, and telephones offer many opportunities to share information on campus and to access resources off campus. All members of the MIT community are obligated to use these facilities in accordance with applicable laws, with Institute standards of honesty and personal conduct, and in ways that are responsible, ethical, and professional.”

   Please refer to [http://web.mit.edu/policies/13.2.html](http://web.mit.edu/policies/13.2.html)
Appendix E: Other Activities (and Individuals) Related to Developing a Code of Conduct at MIT

1. Sloan School of Management standards for professional behavior
2. JoAnne Yates (Sloan School, bystander training)
3. Dean Subra Suresh (School of Engineering, conflict of interest?)
4. Dean Mark Kastner (School of Science, conflict of interest?)
5. Chancellor Phil Clay (conflict of interest?)
6. Vice Chancellor Steve Lerman (faculty code of conduct)
7. VP Alison Alden
8. Graduate Student Council (Oaz Nir, advising)
10. Committee on Discipline
11. Postdoc Association
12. National Institutes of Health (ethics requirements for graduate students)
13. MIT Chaplains
14. MIT Campus Police
15. Working Group on Support Staff Issues
16. Lincoln Lab (Eric Evans)
17. Lincoln Lab (Joyce Yaffee, staff quality of life report)
18. Resources For Easing Friction and Stress (REF, Office of Student Mediation & Community Standards)