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From Regulation to Virtue: A Critique of Ethical Formalism in Research Organizations

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Abstract

The following article argues that the research compliance system has some flaws that should be addressed, particularly with regard to excessive emphasis of and reliance upon formal regulations in research administration. Ethical formalism, understood here as the use of formal rules for the determination of behavior, is not an optimal perspective alone for the promotion of ethical research. The strict adherence to rules and regulations in research administration was formed by forces outside of the organizations' control and adopted by the professional organizations as final, thereby failing to generate the adaptive normative guidance needed to promote a flourishing, dynamic research environment. The analysis continues by offering some solutions for how the laws can be augmented through positive organizational practices and virtuous action (Cameron, Dutton & Quinn, 2003), and finally by finding people in organizations who stand as moral exemplars (Zagzebski, 2010) or leader-mentors (Cheatham, 2010; Gabriel, 2010) who bridge the gap between researchers, organizational leaders, and the regulations.

Keywords: Ethical Formalism, Moral Development, Institutional Isomorphism, Positive Organizational Scholarship, Ethics, Virtue, Moral Psychology, Social Cognition, Mentoring, Moral Exemplars

Introduction

The research compliance system, both fiscal and non-fiscal, has some noticeable flaws that should be addressed, particularly with regard to excessive emphasis of and reliance upon formal regulations in research administration. Research administrators in the compliance field sometimes practice a form of "ethical formalism" in which rules and regulations outweigh other approaches to promoting ethical behavior in the research environment (Bell & Wray-Bliss, 2009). The tendency toward regulatory rigor evolved through government mandate and laws that were created in response to watershed events in ethical history, such as the infamous study of syphilis at Tuskegee. Research administrators had no choice but to enact compliance-oriented practices as the penalties for non-compliance with the federal regulations and mandates are severe. Through the force of law, ethical formalism, or a more extreme form of ethical compliance, became a necessity, and eventually an organizational myth in the pursuit of organizational survival, professional legitimacy, and control. Ethical formalism is the accepted and legitimized practice of absolute ethics in research administration, propelled by ethical saga, controlled by law, rules, policies, and, unfortunately, fear.

In this article, we argue that ethical formalism is not an optimal perspective alone, and that the organizational culture was formed by laws and rules outside the organizations' control, thereby failing to generate the adaptive guidance needed for the flourishing dynamic research environments. The analysis continues by offering some solutions for how the ethical formalistic perspective can be augmented through positive organizational practices and virtuous action (Cameron, Dutton & Quinn, 2003), and finally by creating organizational actors who stand as moral exemplars (Zagzebski, 2010) or leader-mentors (Cheatham, 2010; Gabriel, 2010) who bridge the gap between researchers, organizational leaders, and the regulations.

It is important to clarify that ethical formalism, as understood and analyzed here, has become the preferred approach to the guidance of ethical behavior within organizations. It is distinct from formal ethical theories intended to establish a foundation for ethics itself, such as the formal deontological ethics formulated by Kant as a universal basis for the moral imperatives required of rational agents in general. The issues we address pertain to how ethical conduct is implemented and maintained within and through organizations, rather than the origins of ethical normativity itself. The critique offered is an analysis of the shortcomings in relying upon formal authoritative rules and regulations as the sole source of behavior guidance among research administrators. This extreme ethical formalism should be augmented by the positive promotion of virtuous and responsible agent-based conduct through mentorship and moral exemplarism, irrespective of whatever particular theory or account informs the determination of what one ought or ought not to do.

To be clear, the proposal is not to remove or replace formal rules and regulations, but rather to recognize their limitations and the need for further positive processes towards effective ethical thought and action within research organizations. It is also important to clarify that the following argument is not a critique of research administrators as a professional group who practice compliance administration. On the contrary, both anecdotal and empirical evidence suggests research administrators are a vital professional group who strongly contribute to integrity in the research environment, but whose actions are constrained by political structures in their own organizations so that consistent application of law, policy, or perspective becomes difficult to achieve (Atkinson & Gilleland, 2007; Atkinson, Gilleland & Pearson, 2007). Control is truly a myth as some actors will defy the law or be ignorant of the law regardless of the pressure to comply. Through the critiques and proposals provided here, it is hoped that the efficacy of research administrators in promoting ethical research may be enhanced towards the flourishing of the research environment overall.

In addition, the analyses and suggestions we offer are aimed primarily at the research practices and behaviors within established organizations in the developed world and the deficits we see with the sole reliance upon formal regulations to guide the ethical conduct of research. In other contexts with differing cultural dynamics, such as research conducted in the developing world without established compliance procedures already in place, different emphases may be appropriate or necessary. For example, in a case where informed consent procedures are not in place for the protection of human participants, some formal, foundational regulations and procedures may first need to be put into practice before we can expect the cycle of virtuous research to flourish. Of course, virtuous agency and decision-making entails treating others well, and an emphasis on virtue can itself help ameliorate the ethical problems that informed consent and other such regulatory procedures are intended to address, but we must acknowledge that the promotion of virtue through exemplary mentorship is not a catch-all solution for the diverse ethical issues that occur across all cultural contexts. A developing country could be in the foundational stages of change and might require an initial formal approach to raise awareness, just as it was in the U.S. before rules and regulations were enforced.

Problems with Ethical Formalism and Extreme Compliance Administration

We begin our analysis by surveying some problems with ethical formalism in general, through both theoretical considerations and empirical findings across social psychology, cognitive science, decision theory, and ethical theory, to be followed by a critique of ethical formalism within research environments in particular.

First, it is important to recognize that rules and regulations are abstract objects consisting of broad normative generalizations that stand apart from the concrete particular details of human life. As such, formal rules and regulations alone are not adequate for handling the complex contextual factors that pertain to human decision-making in actual

practice. Of course, the generality established by formal rule systems serves a purpose, providing a clear framework for important commonalities in the values and limits that ought to guide human behavior, but this alone is insufficient for the establishment of concrete ethical behavior in practice. At the very minimum, rules and regulations must be interpreted and applied, which demands further cognitive processing and skilled decision-making in virtually any context involving the complexities of human social life (Hastie & Dawes, 2001). A rule can specify what one ought or ought not to do in certain clearly defined cases, but it alone cannot provide the guidance needed to make well-formed decisions amidst the myriad details and nuances surrounding the choices people face, especially in complex social environments. This is a point that has long been recognized in ethical theory, most notably in regard to Aristotelian virtue ethics, which emphasizes the need for well-habituated virtuous practical reasoning skills in the cultivation of a good life (Aristotle 1999). Abstract formal structures of rules and regulations alone cannot provide a sufficient normative basis for concrete human thought and activity.

Another distinct and significant problem in relying upon the authority of rules and regulations to guide behavior is the diffusion of responsibility that tends to accompany the deference to authority involved in rule following. When told to behave in a particular manner by an authority, people exhibit a psychological tendency to offload responsibility for the consequences onto the external situation (Auhagen & Bierhoff, 2001). In Stanley Milgram's famous obedience experiments, for example, the subjects who obeyed the authoritatively imposed order to shock another person tended to explain their actions not as something that they themselves would normally choose to do but rather as an expedient matter of just doing their job, as assigned by an external authority (Milgram, 1974). The subjects were merely acting in accordance with the rules and guidelines placed upon them, without considering themselves as ethical agents independently in charge of their own choices and thereby responsible for the consequences. This is particularly troubling when the rules themselves may lead to unethical circumstances, as was the case in Milgram's obedience experiments, but it is important to recognize that the problem is broader than the capacity of humans to engage in unethical behavior when compelled to do so by the rules. Even when the consequences may be perfectly ethical, the diffusion of responsibility onto the external authority of the rules creates psychological deficits in the person's decision-making, such that the person in question does not engage in the kind of thoughtful, conscientious and goal-oriented agency that could maximize the positive efficacy of their job and the flourishing of the organization in which they work.

The problems with ethical formalism in general may be summarized by observing that reliance upon rules and regulations alone to establish ethical behavior displaces the reasoning and responsibility of human agents. This is not to say that rules and regulations are bad or problematic in themselves, but rather that their over-emphasis within ethical formalism, and an extreme compliance framework, creates a rigid formal authority that diminishes the nuanced practical reasoning required of good decision-making in complex circumstances and replaces mindful responsibility with external compulsion. In consideration

of the reasoning skills and conscientious choices required for making ethical decisions in the context of complex and ever-changing human social arrangements, abstract rule systems are, by themselves, clearly inadequate.

Problems with Ethical Formalism in the Research Environment

Turning to research environments in particular, part of the problem with ethical formalism seems connected to the issues of reduced resources, difficult implementation schemes, increased workloads and regulation to the point that some actors become focused on expediency rather than meaningful interactions. In addition, the problem seems to stem from poorly developed professional relationships. Evidence exists that ethical formalism has caused a small rift between research administrative leaders and the research faculty, and in some cases an "us versus them" mentality exists between them (Atkinson & Gilleland 2007). Some research administrators believe they follow a strong set of norms, and that it is their duty to be defenders of the law to make sure the researchers stay in line (Atkinson & Gilleland, 2007). Jones (2011) noted that "adherence to an absolute truth" could lead to "isolation" of the actor, and loss of "balance" in the system (p. 74). Mohr (2011) encouraged transformational leaders to "respect everyone for his or her knowledge and experiences" in order to improvise and change. (p. 61)

At the same time, under ethical formalism, actors are "given to believe that there is a right answer to everything, and for the other to be right, one must be wrong" (Jones, 2011, p. 69). The institutionalized rules are "impersonal" and "beyond the discretion of any individual participant" (Meyer & Rowan, 1977, p. 344). Actors in this system seem to be less concerned about the individual interactions and more about the legitimacy of their own knowledge. It creates actors as police officers. (Meyer & Rowan, 1977)

Additionally, through strict application of ethical formalism, some research administrators act more out of expedience than a shared understanding with their researcher colleagues (Scott, 2001). Through this framework, actions are guided by instrumentality rather than personal strength or integrity (Scott, 2001). Also, the environment tends to create professionals who rely on their knowledge of the regulations to enforce action rather than their principles developed through communication. Placing an ethical code or law within the administrative structure of an organization also carries the risk of placing ethical decisions into the hands of "destructive achievers" or strong organizational agents who use "power in a way that destroys trust and commitment, [and] suppresses innovation." (Kelly, 1987, p. 7)

Furthermore, Bell and Wray-Bliss (2009) noted that ethical formalism in its current formation is marked by the following problems: heavy reliance on ethical committees bound by regulatory "absolutes;" dependence on inconsistent external audit and rule interpretations; the unintended consequence of pushing researchers to ignore important, more rigorous research in favor of less rigorous practices that may not answer the questions completely; or to the worse extreme, great scientific minds decide to forgo research altogether to avoid the administrative and regulatory requirements involved in research.

The Institutional Construction of Ethical Formalism

To address the problem, it is important to understand the forces that created ethical formalism. DiMaggio and Powell (1983) and Meyer and Rowan (1977) noted that organizations do not operate as isolated forms in charge of their own destiny, rather, institutions operate in a system of other organizations and regulatory agencies where the goal of an institution is finally to seek legitimacy and survival alone with limited regard to innovative rational action. Again, this is not true for every organization or individual, but it can be somewhat pervasive given the complexity of the organization's environment, culture and climate.

According to institutional theory, institutional change was likely the result of three isomorphic forces: coercive, normative and mimetic (DiMaggio & Powell, 1983). Coercive isomorphism, in this argument, is the force of institutional change brought on by law and powerful government entities. When the actors in the research system realized they had to follow mandates by governmental bureaucratic structures in order to continue funding, ethical formalism became a homogenized method of action across research systems because of the mandate by law. (DiMaggio & Powell, 1983)

Ethical rules in the research environment were formed out of the need to address critical societal-research issues. Perhaps it was not the intent of the authors of research regulations to create a form of ethical formalism that was too restrictive, but Tuskegee, for instance, and other historical atrocities were the social impetus to create a strong foundation for transforming the research environment at a time when there were no noticeable rules for such activities. Fu and Burgeon (2011) noted that strong foundations are needed for transformations, but that the foundational aspect of transformational cycles is but a single event in a group of events that occur during change and transformation. An ethical formalism was immediately necessary, but the foundation was allowed to evolve unchecked for unintended consequences. When change stagnates, actors can become mired in one stage of transformation, never to move on and adapt to changing needs. They begin to believe they are always right because of history, and they fight against change. Healthy cycles require innovation and change at several crossroads and levels of re-evaluation to be effective. Following Fu and Burgeon's (2011) Tao model of leadership and change, the original intent of the regulations, then, was to "respond" to an evil in the world, form a strong "foundation" of practice and prevention, and then to "influence" the rest of the world to follow the example.

Furthermore, ethical formalism is perpetuated through the second mechanism, normative isomorphism, which is characterized by the process of professionalization (such as the Society of Research Administrators and the National Council of University Research Administrators) as the carrier that encouraged groups to act the same way and rationalize these actions in their home organizations. (DiMaggio & Powell, 1983)

Professionalization is a process of seeking legitimacy through specialized and shared knowledge (Powell & Dimaggio, 1991). By seeking legitimacy and referent power, research

administrators as a professional group came to define their own work practices, incorporated the mandatory rules as a core component of knowledge, and certified their own body of knowledge, all which allowed them to influence these practices of their organizations. (Hamilton, 2010; Roberts, 2006)

Under these conditions, rational action or planning seem to play a more limited role in affecting the future of ethical practice in research leadership (DiMaggio and Powell, 1983), especially in federally funded research organizations where one must do as the funding agency says or forget about funding. The transformational cycle, however, slowed somewhere in the process. The structures seem to constrain individual action to the point that actors or agents in the organization have no choice but to follow what is going on in the field lest their professional and organizational legitimacy be scrutinized. Actors face shut downs of major research functions by federal agents if they have not followed the letter of the law. "Force, fear and expedience" become the "central ingredients" of this particular style of organizational action (Scott, 2001, p. 53). The myths become incomplete and promote "false truths or limit...actions through fear and isolation" (Jones, 2011, p.77). Following Fu and Burgeon (2011), perhaps it is time to re-evaluate, "innovate," and push the cycle of change in a positive, virtuous direction that accounts for the intricacies of daily human interactions.

A Proposed Pathway to Change

How do leaders promote the emergence of a system of ethical behavior that not only includes the letter of the law, but also includes what the letter of the law forgot? Actors will not achieve this status through coercive power, threats of legal sanctioning or expedience alone. Research administrators are actors and perpetuators of their own myth of control who should consider their leadership roles as change agents. They should open themselves up to change, reflexively, and figure out how to modify or create new modes of behavior through purposive action. (David & Bitektine, 2009)

The solution seems to be found in enhancing the organizational elements that were underdeveloped during the institutional homogenization process described above. It would be necessary to educate organizational actors to think outside their current structure (institutionalized structure) and strive toward innovative and virtuous processes in their own organizations. David and Bitektine (2009) noted that isomorphism is not the final state of organizational change and that "structures and patterns" can change and are sometimes "discarded" either through political power or social pressures. (p. 163)

Widespread and rapid change would likely require revisions in organizational structure, but following institutional theory, it stands to reason that actors can begin to seek a balance and some change through Scott's (2001) cultural-cognitive pillar of organizations. Scott noted there are three pillars of organizational function: regulative, normative and cultural-cognitive. It is clear from the previous explanation that the regulative (coercive) and normative (professionalization) pillars are the well developed mechanisms in the research system, but the elements that comprise the cultural-cognitive pillar seem to be weak.

Scott (2001) noted that the basis of compliance in the cultural-cognitive pillar alone is shared understanding, not expediency, not social obligation. He noted that the mechanism of compliance is not coercive or normative, but mimetic or based perhaps on copying other moral actors in the field. Scott said legitimacy comes not from legal sanctions or moral governance, but from culturally supported practice. True, it could be said that ethical formalism is the culturally supported practice because of its homogenization in the current organizational environment, but as illustrated, ethical formalism alone misses some issues and could result in some unintended consequences. We are operating from the standpoint of an incomplete or unreasonable myth, and, according to Campbell (1968) (as quoted in Warm, 2011), myths should teach us "how to be human," not restrict principled action.

Engines for Change and Proposed Solutions

Jones (2011) noted when actors hold on to the myths of control, they believe change will cause everything to "spin out of control" (p.70), and therefore, actors become resistant or afraid of change. The questions become, then, how does one break free from operating by a fear-based standard to a standard that promotes flourishing? How does a Research administrator enhance the ethical repertoire so the needs of researchers, research participants and the federal regulations meet at a common point to create an enhanced ethical practice in organizations? Bell and Wray-Bliss (2009) call for more transparency and reflexivity in our interactions, a respect for "greater self awareness in relation to ethics" and call for the development of "dispositions of honesty, sensitivity, respectfulness, reciprocity and reflexivity" to counteract the negative aspects of ethical formalism. (p. 89)

A good starting place would be to transform organizations not just for the research function but for all organizational processes. It seems Bell and Wray-Bliss (2009) are calling for more positive organizations, not just more positive actors, because unless some systemic organizational behaviors are changed, unless some of the negative structure is loosened, it would be difficult to support these "dispositions" given the way the research administrative structure and myths evolved. Would it be asking too much to ask our agents to follow a mode of action that is not supported by the rest of the organizational culture? Leadership for transformation, then, is about deconstructing the myths of control especially control driven by fear (Jones, 2011). He noted "in the future, leaders will not be remembered for their professional, technical or cost-cutting skills, but for their wisdom, empathy, presence, intuition and artistry." (Jones, 2011; p. 65)

Cameron, Dutton and Quinn (2003) also proposed that actors and leaders should try to imagine organizations as "typified by appreciation, collaboration, virtuousness, vitality and meaningfulness" (p. 3). They asked actors to consider organizations as having "virtuous processes" that build in the qualities of organizational life that rules and regulations fail to do completely. How do strong actors encourage other strong actors in organizations so that a mutual respect of the "good of a person" is shared across the system? Leaders are strong agents, and it is their responsibility to build other strong agents in organizations, to produce a positive leadership effect. This responsibility may be best actualized through leaders taking

on the role of mentors, thereby engaging in direct social relations that not only facilitate ethical behavior through example but also emphasize and cultivate the reasoning skills and responsible decision-making central to being a virtuous agent and flourishing human being. (Aristotle 1999)

For this article, strong agents are those leaders in an organization who not only sit in formal leadership positions but possess the referent power and mentoring skills to break out of the confining structures and myths of their organizations to make the organization and its people change from a single collective rationality forced by law to a collective ethics enabled by strong actor-member relationships. To be clear, we need good myths and saga to hold our groups together, but if the myths hold a destructive element, such as fear, then they should be targeted for modification. The analysis is not a call to resist law, but to enhance ethical behavior through principled action. Because research administrators serve a virtuous function in the research system, they are strong enough agents in organizations to begin changes at the very ethical core of a research organization.

Park and Peterson (2003) support the notion of strong agents (leaders) in organizations by suggesting that individual-level virtues are "analogous" to "organizational-level virtues" (p. 38). Leaders in this context would "influence actual conduct within the organization in ways that people can recognize" (Park and Peterson, 2003; p. 39), which supports Scott's (2001) notion that the cultural-cognitive pillar of organizations seeks compliance through shared understanding and a mimetic (copying) mechanism. It seems shared understanding must be promoted by strong actors or those with the skills that promote strong actor-to-actor exchanges.

In support of multiple networks of strong relationships, and in contrast to ethical formalism, "organizational virtuousness" is not about perpetuating an absolute right or an absolute ethics. Cameron (2003) noted "neither individuals nor organizations are completely virtuous or non-virtuous" (p. 49). Instead, a virtuous organization promotes "being virtuous" at the social-psychological level as well as organizational level, which can have an overall effect on the advancement of better individuals and then better organizations (Cameron, 2003; p. 49). The measure of a virtuous organization, then, is directly proportional to the level of positive human impact produced by the organization inside, among its agents, as well as outside the organization, among agents working in the network of organizational actors. (Cameron, 2003)

Cameron (2003) studied the effects of downsizing on attitudes and beliefs and performance in organizations. Organizations were considered virtuous based on popular press articles. Cameron (2003) found that the effects of downsizing were minimized by virtuousness, and this trend was in sharp contrast to the usual negative effects of downsizing, which are decreased perceptions of trust, culture, and integrity. Cameron (2003) also found a positive association between virtuous activity and increased performance in virtuous firms, and in some cases found statistically significant relationships between virtuousness and increased profit. It is interesting to note that Cameron (2003) found that virtuous traits

"amplified positive emotions, social capital and prosocial behavior" as well as "buffered the organization from negative effects of downsizing by enhancing resiliency, solidarity, and a sense of efficacy." (p. 59-62)

Bright, Cameron and Caza (2006) studied amplifying and buffering in downsized organizations where they defined "tonic virtuousness" in terms of sustained "hope, humility, honesty, integrity, kindness and virtuous purpose" and "phasic virtuousness" in terms of periodic forgiveness and periodically taking responsibility (pp. 253-254). Using a factor analytic approach (both confirmatory and exploratory), they noted a significant increase in the effectiveness of forgiveness and tonic virtuousness in reducing negative impacts of downsizing, illustrating "buffering." They also noted that "forgiveness" and a sense of "responsibility" increase "tonic virtuousness" itself. (Bright, Cameron & Caza, 2006)

One of the questions that arises at this point is how do we tap into these virtuous organizational processes for research organizations? Hawks, Benzley and Terry (2004) agreed that laws tend to make people forget principles, which require a high level of personal integrity rather than total dependence on law, rules and policies. A person should have a level of moral development that pushes the status of law to the level of simple reminders to check behavior in light of a relationship with others. Basically, rules do not fit every situation and leave out the need to ask questions. Hawks, et al. (2004) suggested that corporations could implement a type of "moral meter" based on the principles of the Taguchi Loss Function quality control method, but grounded in the moral development literature. The method encourages actors to continue to improve moral development by continuing to "eliminate the variation around the target" of moral behavior by asking questions of themselves about the sources of morality (Hawks, Benzley & Terry, 2004). Although this is a good starting point, the difficulty seems to be in defining the moral target point for a group of individuals. The authors state, however, that the simple act of "searching for principles" is a very valuable act in the process of developing a conscience. (p. 264)

Verbos, et al, 2007 believe that a "living code" should be developed, and that this code begins with the "harmonious interaction of authentic leadership" (p. 17). Their model echoes the positive turn in organizations by setting organizational action around virtuous processes, in this case building an "ethical organizational identity" around a "living code of ethics [which is] the cognitive, affective, and behavioral manifestation of an ethical organizational identity within a positive ethical organization" (Verbos, et al, 2007, p. 22). The emphasis is on the "cognitions" of members of the organization to implant the ethical framework in their minds and hearts, through a Transformational Leadership perspective.

As a model, Transformational Leadership seems to promote the strong actor exchanges needed to promote principled action because it emphasizes individual consideration and idealized influence at the social-psychological level and allows leaders to occupy a trusted space in the "follower's" psyche (Northouse, 2004). Leader-member exchange theory also seems to support the existence of strong agents and their influence on other agents (or weaker agents) of the organization through the formation of strong dyadic

relationships and multiple networks of strong relationships (Dansereau, 1995; Graen and Uhl-Bien, 1995; Northouse, 2004). This notion also seems compatible with Vebler et al's (2007) framework of "attraction-selection-attrition" method of interaction, which assumes a certain level of responsibility for ethics at all levels of leader-member exchanges.

Mentoring, Moral Exemplars, and Virtuous Agency

One of the pathways to transformational leadership that exhibits and transmits high caliber virtuous action, greater leader-member exchanges, and memorable leaders of substance, seems to be through mentoring, because mentoring is also about building trust and focusing on individual development (Atkinson & Pilgreen, 2011; Cheatham, 2010; Gabriel, 2010). This notion is compatible with Bauman's (1993) assertion of an "ethics with the other." The mentoring model can be extended from the one-on-one level into multiple levels with leader-member exchange theory and transformational leadership pathways as the carriers (Graen and Uhl-Bien, 1995). The solution proposes that mentors are and should be seen as moral exemplars that spread these behaviors throughout the organization.

The presence of moral exemplars can help evoke and develop the positive values and skills needed for effective ethical conduct, through several inter-related processes involved in both an individual agent's own decision-making and the broader social relationships between agents within organizations. First, moral exemplars may provide a foundation for ethical thought and behavior, as the ethical theorist Linda Zagzebski has argued (Zagzebski, 2010). As a major figure in the recent philosophical return to virtues, in both ethical theory and epistemology, Zagzebski emphasizes the importance of virtuous character traits in the development of responsible agency, with regard to both reasoning (virtuous belief formation) and action (virtuous moral behavior). A core vehicle for the development of virtuous character traits is exposure to, and emulation of, a virtuous moral exemplar. To this effect, Zagzebski states "Moral learning, like most other forms of learning, is principally done by imitation. Exemplars are those persons who are most imitable, and they are most imitable because they are most admirable. We identify admirable persons by the emotion of admiration, and that emotion is itself subject to education through the example of the emotional reactions of other persons" (p. 49). When exposed to an admirable moral exemplar, the emotive power of the admiration naturally leads to an inclination to imitate the admirable behavior, which can in turn cultivate positive character traits through imitative learning.

Furthermore, human beings have a general tendency to pay attention to what others may think of them, particularly with regard to the interpersonal relationship dynamics within social organizations (Goffman, 1959). An agent's actions are shaped in part by the anticipated impression the actions may make on others, including in particular what others may come to believe in light of the actions. This "saving face" process may be enhanced with the presence of moral exemplars, such that people in the observable presence of a moral exemplar may be particularly keen on making a good impression and thereby motivated to behave in a manner that exhibits virtuous character. Conversely, a mentor serving the purported role of moral exemplar to others may feel an enhanced need to present positive

and admirable character traits while under the imitative gaze of others. These interpersonal relations may be plausibly regarded as establishing positive feedback loops between mentors and those under their leadership, such that they propel themselves together towards positive and efficacious agency. These processes together (the instillation of virtue through admirable imitation and the reflective self-awareness that emerges on both sides of the mentor-mentee relationship) can successfully foster the reasoning skills and responsible goal-oriented agency found lacking in the over-reliance upon external rules within ethical formalism.

Some skeptics may object that this perspective itself over-emphasizes the role of virtuous character in ethical theory and moral psychology. For example, the philosopher John Doris (2002) argues that human beings tend to overestimate the role of character traits and underestimate situational factors in their understanding of human behavior, drawing upon a wide body of evidence in social psychology for the powerful influence of social circumstances to criticize virtue ethics. Doris expresses some legitimate concerns with regard to how we should understand moral behavior and the causal factors that impact it, perhaps providing some worthwhile grounds for rethinking the nature of human personality and character traits, but his critique does not undermine the more pragmatically-oriented points advanced here. In fact, as suggested above, the development and transference of virtuous agency within social organizations is itself heavily shaped by the particular situational circumstances at hand, such as the visible presence of mentors as moral exemplars. Importantly, virtues do not develop in a vacuum, and are by no means immune to the influence of social circumstances. To the contrary, character traits themselves may be deeply situational in nature, as Upton (2009) has recently argued, in light of the situationist findings of empirical social psychology. Considering this, the emphasis upon virtues advocated here, with regard to the development and promotion of ethical and conscientious agency through mentorship and moral exemplarism, should not be taken as an alternative to addressing the external social situation in attempt to foster ethical research administration procedures. Rather, the point is to reevaluate the organizational structures at work in research administration environments, with an emphasis towards the establishment of social relations that best maximize the responsible reasoning and conscientious decision-making required for the flourishing of a complex and dynamic social institution. Mentoring through virtuous leadership is a natural and effective means of achieving this end.

The mentoring model is less about the master scientist socializing the student scientist into the norms of science, but more about individual agents transmitting through trust a set of behaviors to the benefit of more than one or two people (Cheatham, 2010; Gabriel, 2010). Mentoring as a leadership perspective has likely been slow to catch on due to taken-for-granted and assumed understandings of exactly what is "mentoring." Cheatham (2010) noted that "few understand" the history of the Mentor "and the context of its classical definition" (p. 55). He reminded us that Odysseus picked Mentor to "guide" and "develop" his son, Telemachus, and after Athena assumed the form of Mentor, she taught Telemachus to protect "that which is good and learning that which is best. It is a story of teaching someone to prevent harm and advance the good" (Cheatham, 2010; p. 55).

Conclusion

Whetstone (2005) noted that in light of certain organizational scandals, and the impact on society, "obeying the law, even if itself is a challenge, is no longer the moral minimum." (p. 376). Perhaps our analysis echoes Selznick (1992) who noted that institutionalized practices (such as ethical formalism) control our behavior in an organized way while also making behavior "hostage to its own history."

Responsible Conduct in Research education should be established as a component of institutional culture, emphasizing the development and promotion of wise and conscientious decision-making over enforced behavior through externalized control. It should be part of a corporate governance structure to give it an overall institutional legitimacy, and not a circumscribed legitimacy within a certain institutional silo under the heading "research." We ought to incorporate the components of true ethical education within the mix of institutional practices, so that the federal requirements can be balanced. From our analysis, it seems the next natural step would be to teach and encourage our faculty to be good mentors and moral exemplars. Perhaps research faculty should be encouraged to not only produce viable research itself, but also to promote an ethical research culture through the visibility of their own work and the guidance they provide to others. For example, perhaps faculty-to-student and senior faculty-to-beginning faculty mentorships could be more explicitly encouraged within research environments, such that mentor relationships fostering responsible and virtuous research practices become more prominent and customary than they are at present. Additionally, successful researchers could be more directly recognized for the exemplary moral components of their work (e.g., admirable treatment of research participants, successful mitigation of conflicts of interest, noteworthy social benefits of research goals and results, etc.), on top of the more frequently recognized successes in academic research (e.g. publications, receipt of grant funding, etc.). Of course it takes time to become recognized as a moral actor, but the outcome seems to overshadow the amount of time it takes to reach the goal. It is time to move beyond the mission statement to which stakes a claim to moral behavior and actually bring it to practice. As for leadership, it is a Research Administrator's responsibility to act as moral agents themselves. In the end, we can hope that our system of ethics will be a natural extension of thoughts and naturally extend outward into our actions as virtuous agents, such that the rules simply seem superfluous.

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