Office of Inspector General

- Created by Inspector General Act of 1978
- Mission: prevent, detect, and investigate **fraud, waste and abuse**
- **Prevent** --- strong, active outreach program to research communities
- **Detect** --- proactively look for vulnerabilities; open access via hotline
- **Investigate** --- all allegations:
  - civil / criminal cases
  - administrative cases
    - research misconduct
Prevention

- Risk-based Compliance and Ethics Programs
  - Leadership – tone at the top
  - Management - accountability
  - Systems
  - Training
  - Enforcement
  - MEASURES for success

- Educate, Educate, Educate, Educate
Prevention: Research Integrity Risk Areas

- Data acquisition, management, sharing and ownership
- Conflict of interest and commitment
- Human subjects
- Animal welfare
- Research misconduct
- Publication practices and responsible authorship
- Mentor / trainee responsibilities
- Merit or peer review
- Collaborative science
- Compliance with rules and regulations
- Financial management
- Laboratory management skills (people / supplies)
Prevention: Modes of Instruction

- Outreach from oversight bodies

- Electronic mechanisms
  - CDs, websites
  - Optional / required

- Funding agencies monitoring mentoring
  - NIH and NSF requirements to report mentoring activities

- University training as part of systemic compliance and ethics programs
Detection

- Allegation receipt
  - Trusted, confidential, anonymous, supported by evidence
  - Ombudsman
  - Hotlines (telephone, e-mail)

- Proactive Strategies
  - Conduct focused review in identified risk areas
  - Plagiarism detection software
  - Agreed-upon dispute resolution strategies
  - “Precollaborative” agreements
Detection: Trends
(x=year, y= relative increase, base year 1995)
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(x=year, y= relative increase, base year 1995)

When you start looking, you can find interesting things!
Investigation - Principles

- Adhere to established policies and procedures
  - Act, intent, burden of proof, seriousness
  - Community standards; assessment by peers
- Fair
- Confidential
- Evidence-based
- Separation of Investigation and Adjudication
- Consistent enforcement and equitable penalties
- Agreed-upon fact-finding process / techniques
Research Misconduct

- **Plagiarism**
  - Papers, proposals
  - Verbatim block or patch
  - Violation of peer review
  - Collaborative efforts

- **Fabrication / Falsification**
  - Verification of data in
    - Papers
    - Proposals
    - Theses, Dissertations

**Federal Actions**
- Reprimand
- Certification
- Assurance
- Ethics class, teach / attend
- Bar peer review
- Award restrictions
- Award termination
- Debarment (public action)
International RM Pressure Points

- **Peer Review Violations**
  - Confidential proposals shared across borders, ideas stolen,
  - Joint investigation?

- **Misuse / Misallocation of award funds**
  - International collaboration but funds are not allocated fairly
  - Joint investigation?

- **Fabrication / falsification in data resulting from international collaborations**
  - Joint investigation?

- **Plagiarism in papers / proposals resulting international collaborations**
  - Joint investigation and consistent training?

- **Samples or intellectual content of native knowledge used without permission**
  - Joint Investigation?
International Challenges

- **Prevention** – uniform expectation for training in risk areas
- **Detection** – fear-free reporting of concerns
- **Investigation** – consistent application of rules, procedures, and principles; fair; objective
- **Coordination** – identification of oversight bodies, early reporting and coordination, fair and consistent action
Global Science Forum: Draft Consensus Document

Six Conclusions:

- Risk-based (cause-based) training programs
- Consistent deterrence by all facets of scientific enterprise
- Principles for effective whistleblowing systems
- Principles for “misconduct” managers
- Principles for effective investigations

Call for international dialog to ensure consistent international fact-finding efforts
Questions?
Contact Information

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