RESEARCH INTEGRITY

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CFAES RESEARCH AND GRADUATE EDUCATION
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THE OHIO STATE UNIVERSITY
COLLEGE OF FOOD, AGRICULTURAL, AND ENVIRONMENTAL SCIENCES
Research Administrators

What our families think we do

What PIs think we do

What deans/directors think we do

What we think we do

What our bosses think we do

What we actually do
TODAY’S TOPICS

✓ Conflict of Interest
✓ Responsible Conduct of Research
✓ Procurement Card Fraud
The *active commitment* to ethical principles and professional standards essential for the *responsible practice* of research.
SOURCES GUIDING RESEARCH INTEGRITY

- Professional codes
- Government legislation
- Institutional policies governing
  - Human subjects
  - Animal subjects
  - Research misconduct
  - Conflicts of interest
- Personal values/responsibility
Research integrity is an integral part of the research process

✓ Planning of research
✓ Conducting the research
✓ Disseminating results
In accordance with sections 2, 3, and 8 of 2 CFR Part 422, institutions that conduct USDA funded research must foster an atmosphere conducive to research integrity, bear primary responsibility for prevention and detection of research misconduct, and maintain and effectively communicate training for staff regarding policies and procedures.
The Office of Research (OR) requires that all eligible research personnel (faculty, staff, and students) complete an online Responsible Conduct of Research (RCR) course through the CITI website www.citiprogram.org
ELEMENTS OF RCR TRAINING

- Conflicts of Interest
- Human Subjects
- Animal Welfare
- Data Acquisition & Management
- Responsible Authorship and Publication
- Research Misconduct
- Mentoring
- Collaboration
- Peer Review
- The Scientist as a Responsible Member of Society
“A conflict of interest in research exists when the individual has interests in the outcome of the research that may lead to a personal advantage and that might therefore, in actuality or appearance, compromise the integrity of the research.”

National Academy of Science
Integrity in Scientific Research
CONFLICTS OF INTEREST

Commitment

Financial
FACULTY CONFLICT OF COMMITMENT (OAA)

- Applies to full-time faculty, including administrators and staff with faculty (PI) appointments

- When external or other activities are so substantial or demanding as to interfere with your teaching, research, scholarship or service responsibilities to OSU or your students

- [https://oaa.osu.edu/sites/default/files/links_files/conflictofcommitment_0.pdf](https://oaa.osu.edu/sites/default/files/links_files/conflictofcommitment_0.pdf)
Teaching at another university during on-duty periods in an academic year, or otherwise representing yourself as a faculty member of another university.

Use of one's professional expertise during on-duty periods in an academic year to provide services that compete with services provided by an academic or service entity within the university.
FACULTY CONFLICT OF COMMITMENT (OAA)

- Participating in private business activities to the detriment of your university education, research, scholarship or service responsibilities

- Conducting research or novel scientific investigation as a private consultant to outside entities, which should be conducted more appropriately as research sponsored through the Office of Sponsored Research Programs
EXAMPLES OF CONFLICTS OF COMMITMENT

- Dedicating more than the permitted **one day per week** on **personal consulting** with a company or companies

- Accepting an unpaid position on a company's Scientific Board of Advisors and having access to and/or divulging **confidential information** when the company is **sponsoring the faculty member's research**

- Using **institutional resources**, including office or laboratory space and secretarial services **in support of personal consulting**
Discuss and Disclose with Department Chair/ Dean

Reduction of appointment, i.e 100% to 75%

Always maintain TRANSPARENCY

https://oaa.osu.edu/assets/files/documents/conflictofcommitment.pdf
Faculty accept an obligation to **avoid financial conflicts** of interest in carrying out their institutional responsibilities (research, teaching, service).

A conflict of interest exists if **financial interests** or other opportunities for **tangible personal benefit** may exert a substantial and improper influence upon a faculty member or administrator's **professional judgment** in exercising **institutional responsibilities**.

Applies to full-time faculty, **including administrators and staff with faculty (PI) appointments**.
Research staff members and students, who are listed as investigators or senior or key personnel on sponsored projects, or protocols requiring IRB, IACUC, or IBC review (or exemption) are also required to comply with these reporting requirements.
WHAT IS A FINANCIAL CONFLICT OF INTEREST?

- Having **significant involvement and/or financial interest** in an entity that does business with the university

- Participation in research that is **funded by an entity** in which the faculty member or the faculty member's family is involved or holds a **significant financial interest**
WHAT IS A FINANCIAL CONFLICT OF INTEREST?

- Entering into consulting agreements that purport to transfer to a private entity intellectual property that belongs to the university.

- Use of one's professional expertise to provide services that compete with services provided by an academic entity within the university.

http://orc.osu.edu/files/Policy-on-Faculty-Financial-Conflict-of-Interest.pdf
Ohio Ethics Law

- **102.03** - Conflict of interests and accepting or using public position to obtain something of value

- **2921.42** - Having an unlawful interest in a public contract

- **2921.43** - Soliciting or receiving improper compensation
OSU Policies

- Conflict of Interest and Work Outside the University Policy, 1.30
- Nepotism Policy, 1.25
- Faculty Financial Conflict of Interest Policy
- Faculty Paid External Consulting Policy
- OSU Extension Conflict of Interest Policy Statement
  - University Employees with Extension appointments
For research purposes, if it is determined that a significant financial conflict of interest exists that may directly and significantly affect the design, conduct or reporting of a specific research project, then a formal **Conflict Management Plan (CMP)** is created by The Ohio State University Conflict of Interest Advisory Committee (COIAC) to manage, reduce, or eliminate the conflict.

**OSU Office of Research Compliance**
Faculty, staff and students who are working on federally-funded research are required by federal law to update their disclosures within thirty (30) days of receiving any new or additional financial interests.

- You can file or update anytime: [http://go.osu.edu/coi](http://go.osu.edu/coi)

- The goal? To promote TRANSPARENCY.
HUMAN SUBJECTS

- History
- Belmont Report
  - Respect for Persons
  - Beneficence
  - Justice
- Common Rule
  - Regulations for research institutions
  - Informed consent
  - IRB requirements
  - Vulnerable populations (prisoners, pregnant women, and children)
- Institutional Review Board (IRB)
- Animal Welfare Act (1966)
  - Warm-blooded species (except rats, mice, and birds)
  - Excludes invertebrates, fish, and farm animals
  - Register with USDA
  - Enforced by unannounced inspections with USDA
- The Guide
  - Standards for housing, medical care, facilities
- 3 R’s
  - Replacement
  - Reduction
  - Refinement
- Institutional Animal Care and Use Committee (IACUC)
Violation of the standard codes of scholarly conduct and ethical behavior in professional scientific research

- Fabrication
- Falsification
- Plagiarism
- Ghost-writing
- Photo manipulation
- Suppression/nonpublication of data

RESPONSIBLE AUTHORSHIP & PUBLICATION

- **Authorship**
  - Who should be listed as an author?
  - Who shouldn’t?
  - What order?

- **Publication**
  - Full and fair description
  - Accurate report of the results
  - Honest and open assessment of findings

- [http://retractionwatch.com](http://retractionwatch.com)

Significant departure from norms, committed intentionally, knowingly, or recklessly

- Fabrication
- Falsification
- Plagiarism
University of North Carolina Professor

- Eleven instances of data manipulation on an NIH grant and ACS Chemical Biology journal
- Convicted of research misconduct by falsifying data
- Paper was retracted
- Debarred from contracting or subcontracting with any agency of the United States Government
- Excluded from serving in an advisory capacity, peer reviewer or consultant on any US Public Health Services activities
RESEARCH MISCONDUCT EXAMPLES

- Durham Business School Professor and Dean
  - Confirmed disciplinary charges for plagiarism
  - Journal article published (2008)
  - Dishonorably discharged from the University (2007)
  - Stripped of his doctoral degree by York University

ORI Research Misconduct case summaries: Compilation of case summaries when punitive administrative action were taken. ORI.

The 10 greatest cases of fraud in university research: Blogposts of research fraud from OnlineUniversities.com.
**REPORTING RESEARCH MISCONDUCT**

- Allegations can be filed with **anyone**
  - Chair, Dean, VP of Research, Anonymous Reporting Line, Office of Research

- **OSU Misconduct Policy**
  - [http://orc.osu.edu/files/Misconduct_Policy.pdf](http://orc.osu.edu/files/Misconduct_Policy.pdf)

- **Anonymous Reporting Line**
  - Phone: 866-294-9350
Begins with experimental design and protocol approval
Involves recordkeeping in a way that ensures accuracy and avoids bias
Guides criteria for including and excluding data from statistical analyses
Entails responsibility for collection, use, and sharing of data.
WHAT IS FRAUD?

An act or course of deception, an intentional concealment, omission, or perversion of truth, to gain unlawful or unfair advantage, induce another to part with some valuable item or surrender a legal right, or inflict injury in some manner.
American Express “OSP Procurement Card”
  - Linked directly to the OSP sponsored research project number

Procurement Card (P-Card)
  - Maintained at the department level and expenses reallocated to an OSP project number
Georgia Tech Employee
Program Coordinator for the College of Management

- June 2003 – May 2007: $170,000
- Car insurance, cell phone bills, car repair, Sam’s Club, wedding catering, diamond ring, college tuition, etc.
- Sentenced to 10 years in prison to be followed by 10 years probation
Institutions have the obligation to address allegations of research misconduct. Institutions should have processes and procedures to investigate misconduct and mete out justice as is appropriate.

HOW TO AVOID THESE SITUATIONS

- Maintain Transparency
- Report conflicts of interests
- Report observations of Research Misconduct
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