Department of Veterans Affairs

Memorandum

Date: February 23, 2001

From: Chief Research and Development Officer (12)

Subj: Clarification of Research Integrity Policy

To: ACOS for Research & Development/Research Coordinator

1. On December 6, 2000, the office of Science and Technology Policy (OSTP), Executive Office of the President, issued a Notification of Final Policy establishing a new Federal-wide Policy on Research Misconduct. VHA is in the process of revising the VA policy on Misconduct in Scientific Research (M-3, Part I, Chapter 15) to conform to the new Federal-wide policy and will issue new regulations and a new Handbook on Research Integrity later this year.

2. Under the new Federal-wide policy, research misconduct is defined as fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results. The actions are further defined as follows:

   - Fabrication is making up data or results and recording or reporting them.
   - Falsification is manipulating research materials, equipment, or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.
   - Plagiarism is the appropriation of another person's ideas, processes, results, or words without giving appropriate credit.
   - Research misconduct does not include honest error or differences of opinion.

3. In the past, the Department of Health and Human Services (DHHS) and VA both have employed a broader definition of "scientific" misconduct. In addition to fabrication, falsification, and plagiarism, VA policy refers to "serious deviation...from accepted practice" in conducting and reporting research, and also to "material failure to comply with Federal requirements..., e.g. the protection of human subjects and the welfare of laboratory animals." However, in recent years DHHS, VA and the scientific community in general have come to consider research misconduct as limited to fabrication, falsification and plagiarism. At VA the more limited categories of research misconduct, i.e., fabrication, falsification, and plagiarism have historically been handled through a formal scientific misconduct proceeding. When other research improprieties occur, they have generally been dealt with via routine disciplinary measures, such as, administrative boards.

4. We anticipate that the new VA policy and regulations will formally adopt the new and more limited Federal-wide definition of research misconduct and will specify that other research improprieties should be dealt with by usual administrative measures. In the interim VA facilities should continue to use routine administrative measures to deal with research improprieties that fall outside the new formal definition of research misconduct.

5. This clarification of VA's research misconduct policy is in no way intended to minimize the importance of research improprieties that fall outside the formal definition of research misconduct. Violations of federal rules that govern the protection of human subjects in research and the welfare of laboratory animals are serious and unacceptable. Appropriate disciplinary action should be taken whenever such violations occur.

John R. Feussner, M.D., M.P.H.

cc: Medical Center Directors (00)
Peter Poon (10R)
Angela Prudhomme (02)