Research Misconduct & Compliance

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What is Research Misconduct?

• Fabrication
• Falsification
• Plagiarism

http://www.research.northwestern.edu/ori/misconduct/
Research Misconduct

Fabrication & Falsification

• Reporting experiments, measurements or other statistical analysis never performed
• Manipulating or altering data
• Selective reporting

Plagiarism

• Representing another's work as one's own
Do you have research administration or compliance concerns and don't know who to call?

Contact the Office for Research Integrity (ORI) at nu-ori@northwestern.edu or (312) 503-0054. ORI will assist you or direct you to the appropriate unit or individual who can assist you.

For Any Research-Related Concerns, including Research Misconduct

- Contact the Office for Research Integrity; or
- Contact your supervisor, department chair or dean; or
- Report concerns anonymously via Ethics Point. Northwestern University has contracted with Ethics Point, a third party vendor, that will allow you to report concerns anonymously online or by dialing (866) 294-3545.

Specific Research Compliance Areas

Consult the University's Research Ethics and Compliance Page to identify contacts for other specific research concerns:

- Animal and Human Subjects
- Grant Management/Misappropriation of Cost
- Falsification of Research Effort

The Office for Research Integrity can also be contacted for any of the above listed issues.

Non-Retaliation

Northwestern policy prohibits the taking of retaliatory action against anyone for reporting or inquiring about potential breaches of University policy or for seeking guidance on how to handle suspected breaches. The identity of confidential sources will be protected to the extent consistent with the needs of an inquiry or investigation. Those individuals who provide information in good faith about questionable conduct will be protected against reprisals.

Northwestern also has specific whistleblower protections to comply with American Recovery and Reinvestment Act of 2009 (ARRA) awards.

http://www.research.northwestern.edu/ori/misconduct/
Fiduciary Duty

• Fiscal Fiduciary Duty:
  – Northwestern University, faculty and staff have a duty to ensure research funding is spent as intended
  – Funding agencies have to rely on institutional and personal integrity
  – Rules and regulations provide us with parameters
  – Regulations will always be a part of research
Penalties for Non-compliance

**Institutional:**
- Fines and penalties
- Exceptional status
- Funding reduction

**Personal:**
- Criminal/civil sanctions
- Suspension and debarment
- Professional integrity compromised
## Recent Examples of the Impact of Non-compliance

<table>
<thead>
<tr>
<th>Institution</th>
<th>Settlement Time Frame</th>
<th>Details</th>
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<tbody>
<tr>
<td>The Ohio State University</td>
<td>March 2011</td>
<td>• Auditors reviewed costs on 3 awards and questioned $1.7 of $22.5 million in costs. Auditors found compliance issues in subrecipient monitoring, cost sharing, effort reporting, and participant support costs.</td>
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<tr>
<td>Dartmouth College</td>
<td>October 2010</td>
<td>• $275,000 settlement and $604,000 in contract funds returned to the government for contract pricing and cost recovery issues, lack of compliance with Federal Acquisition Regulation (FAR), and Conflict of Interest issues.</td>
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<td>Yale University</td>
<td>December 2008</td>
<td>• $7.6 million settlement for inadequate documentation of cost transfers and summer salary charges wrongly charged to federal grants</td>
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<tr>
<td>Cornell University’s Weill Medical College</td>
<td>Fall 2007</td>
<td>• $2.6 million settlement for a PI failing to disclose on grant applications to the NIH the full extent of various active research projects</td>
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<tr>
<td>University of Connecticut</td>
<td>January 2006</td>
<td>• $2.5 million penalty for overstating anticipated expenses, overcharging the government, and billing for items not covered by grants; Cost sharing issues</td>
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<tr>
<td>Northwestern University</td>
<td>February 2003</td>
<td>• $5.5 million penalty for overstating effort reporting on federal sponsored projects</td>
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Ethics and Compliance

A part of Northwestern University’s commitment to ethics and compliance is to provide community members with the information needed to act appropriately. The University’s Standards for Business Conduct (PDF) provides a framework for administrating University resources and establishes guidelines for acceptable standards of behavior.

If you have questions or concerns, following are links to contact people, phone numbers, e-mail addresses or web sites that may assist you in understanding Northwestern’s policies and procedures, as well as provide a process for voicing your concerns.

In addition to these resources, Northwestern has selected EthicsPoint to provide you with a simple way to report activities that may involve misconduct or violations of University policy. You may file a report here or by dialing 866-294-3545. This service is not a substitute for, nor does it supersede, any existing reporting methods or protocols already in place at Northwestern for reporting suspected problems or complaints. Instead, the EthicsPoint system provides an additional means of reporting such issues. Any suspected problems or complaints reported via EthicsPoint will be reviewed in accordance with current University procedures, including those described in the Faculty, Staff, or Student Handbooks. Northwestern policy prohibits the taking of retaliatory action against anyone for reporting or inquiring about potential breaches of University policy or for seeking guidance on how to handle suspected breaches.
EthicsPoint: A Compliance Hotline

• Report potential misconduct or violations of policy:
  – (866)294-3545
  – www.northwestern.edu/ethics

• Any suspected problems will be reviewed according to University procedures

• Policy prohibits retaliatory action against those reporting

• Anonymous
ANIMAL RESEARCH
Any instance of violation of laws or policies regarding the ethical care and use of animals.

Institutional Animal Care and Use Committee
Susan Kallay, Director
312-503-9339
s-kallay@northwestern.edu

HUMAN SUBJECT RESEARCH NON-COMPLIANCE
Violation of laws or policies relating to research involving human beings. Examples include failure to obtain appropriate approval from the Institutional Review Board, failure to adhere to research protocols, not obtaining informed consent, failure to promptly report adverse reactions.

Institutional Review Board
Heather Gipson, Director
312-503-2816
h-gipson@northwestern.edu

RESEARCH MISCONDUCT
Fabrication, falsification, plagiarism, or other practices that seriously deviate from those commonly accepted within the academic community for proposing, conducting, and reporting on research.

Office for Research Integrity
Lauren Quakenbush, Director
312-503-0054
nu-ori@northwestern.edu
Misconduct Policy

GRANT MANAGEMENT/MISAPPROPRIATION OF COST
Unallowable or questionable expenditures or cost transfers to government grants, contracts, or other agreements. Any expenditures or cost transfers that may be in violation of OMB Circular A-21.

Office of Sponsored Research
Elizabeth Adams, Executive Director, Evanston
847-491-3003
eadams@northwestern.edu

David Lynch, Executive Director, Chicago
312-503-1780
OSR-Chicago@northwestern.edu

Controller’s Office
Mike Daniels, Director
847-491-4710
m-daniels2@northwestern.edu

http://www.northwestern.edu/ethics/research.html
How can *you* ensure compliance?

• We are all responsible
• Understand complex regulations
• Identify resources
• Know when and where to ask for help
• When in doubt, ask
Questions?

WOW... DOES THIS HAPPEN OFTEN?