Scientific Integrity Report Card
Department of Transportation

Note: DOT will be releasing a Scientific Integrity Policy Implementation Manual that will elaborate on the principles established in its policy.

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<th>Scientific Integrity Grading Rubric</th>
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<td>A. Requirement that all agency policy decisions must be based on science subjected to external peer review</td>
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I. **Scientific Misconduct – (11/40 pts)**

A. **Political Manipulation of Science (6/6 pts)**
   1. *Prohibits alteration of technical/scientific documents for non-technical reasons (3/3 pts)*

   “Political appointees at DOT should never suppress or alter research findings or conclusions.”

   2. *Prohibits intimidation or coercion to alter scientific data/analysis/conclusions for non-technical reasons (3/3 pts)*

   “Political appointees are not to censure or coerce DOT employees to alter scientific findings.”

B. **Breadth of Coverage (1/5 pts)**

   1. *Applies to political appointees and senior managers (1/3 pts)*

   The Department of Transportation’s Scientific Integrity Policy only applies to situations where a political appointee is pressuring a DOT employee to alter his or her scientific findings. It does not state whether or not political appointees and senior managers are included as “employees.”

   2. *Applies to contractors, states, and other partners (.2 pts)*

   The Department of Transportation’s Scientific Integrity Policy does not address this.

C. **Whistleblower Protection (4/12 pts)**

   1. *Explicitly protects those filing misconduct complaints from retaliation (4/4 pts)*

   Yes.

   “The Department will have rigorous whistleblower protections to ensure scientific integrity in decision-making. This policy also protects DOT employees that uncover and report such misconduct” Additionally, “the Department will not discipline an employee from refusing to alter findings at the request of a political appointee.”

   2. *Protects scientists for retaliation based on content of work (0/4 pts)*

   The Department of Transportation’s Scientific Integrity Policy does not address this.

   3. *Provides that agency officials who engage in retaliation will be subject to discipline (0/4 pts)*
The Department of Transportation’s Scientific Integrity Policy does not address this.

D. Investigations of Complaints (0/5 pts)
   1. Defined process (0/1 pt)
      The Department of Transportation’s Scientific Integrity Policy does not address this.
   2. Timelines (0/1 pt)
      The Department of Transportation’s Scientific Integrity Policy does not address this.
   3. Ability of complainant to respond (0/1 pt)
      The Department of Transportation’s Scientific Integrity Policy does not address this.
   4. Transparency of findings and rationale (0/1 pt)
      The Department of Transportation’s Scientific Integrity Policy does not address this.
   5. Relationship with the IG is clearly defined (0/1 pt)
      The Department of Transportation’s Scientific Integrity Policy does not address this.

E. Investigation Independent of Chain of Command (0/6 pts)
   The Department of Transportation’s Scientific Integrity Policy does not address this.

F. Sanctions for Misconduct (0/6 pts)
   1. States that misconduct is grounds for disciplinary action or dismissal (2 pts)
      The Department of Transportation’s Scientific Integrity Policy does not address this.
   2. Explicit procedure for discipline of sustained misconduct complaints (2 pts)
      The Department of Transportation’s Scientific Integrity Policy does not address this.
   3. Automatic review of court rulings based upon arbitrary and capricious application of scientific information or scientific findings (2 pts)
      The Department of Transportation’s Scientific Integrity Policy does not address this.

II. Public Communications of Science – (4/40 pts)
A. **Process for scientist to publish or lecture regarding their official work with the general public, in external peer-reviewed journals or at scientific conferences** (2/10 pts)

“With coordination from their immediate supervisor and the public affairs office, DOT scientists may speak to the media and the public about technological matters based on their official duties.”

“Scientific staff is encouraged to present research findings at professional meetings and to publish findings in professional and scholarly journals, consistent with applicable law.”

B. **Absence of policy review or agency screening for the above** (2/10 pts)

The Department of Transportation places some limits on the review by supervisors and public affairs when an employee speaks to the media about his or her official work.

“Supervisors and public affairs officers will not ask or direct federal scientists to alter or suppress findings.”

C. **Ability of scientists to review press releases regarding their work prior to final publication** (0/10 pts)

The Department of Transportation’s Scientific Integrity Policy does not address this.

D. **Explicit provision for agency scientists to be on governing and editorial boards of scientific societies** (10/10 pts)

Yes.

“To the extent permitted by the federal ethics laws and regulations, DOT scientists can participate in professional societies and serve on committees, boards, and other working groups of these societies.”

III. **Transparency of Agency Decision-Making – (5/20 pts)**

A. **Requirement that all agency policy decisions must be based on science subjected to external peer review** (5/10 pts)

“Data and research used to support DOT policy decisions will undergo independent peer review by qualified experts when required and consistent with law.”

B. **Original research documents are part of administrative record** (0/10 pts)

The Department of Transportation’s Scientific Integrity Policy does not address this.

“The Department will document and make available to the public the scientific findings that are considered in its decision-making process to the extent allowable by law. Where appropriate, this should include data and models underlying regulatory proposals and policy decisions.”