<table>
<thead>
<tr>
<th>Scientific Integrity Grading Rubric</th>
<th>Total Possible: 100 Points</th>
<th>Total Awarded: 23 Points</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Scientific Misconduct</strong></td>
<td>Subsection Total: 40</td>
<td>Subsection Total: 6</td>
</tr>
<tr>
<td>A. Political Manipulation of Science</td>
<td>6</td>
<td>3</td>
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<tr>
<td>B. Breadth of Coverage</td>
<td>5</td>
<td>3</td>
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<tr>
<td>C. Whistleblower Protection</td>
<td>6</td>
<td>0</td>
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<tr>
<td>D. Investigations of Complaints</td>
<td>6</td>
<td>0</td>
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<td>E. Investigation Independent from Chain of Command</td>
<td>6</td>
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<td>F. Sanctions for Misconduct</td>
<td>6</td>
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<tr>
<td><strong>Public Communications of Science</strong></td>
<td>Subsection Total: 40</td>
<td>Subsection Total: 14</td>
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<tr>
<td>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</td>
<td>10</td>
<td>2</td>
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<tr>
<td>B. Absence of policy review or agency screening for the above</td>
<td>10</td>
<td>2</td>
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<tr>
<td>C. Ability of scientists to review press releases regarding their work prior to final publication</td>
<td>10</td>
<td>0</td>
</tr>
<tr>
<td>D. Explicit provision for agency scientists to be on governing and editorial boards of scientific societies</td>
<td>10</td>
<td>10</td>
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<tr>
<td><strong>Transparency of Policy Decision-Making</strong></td>
<td>Subsection Total: 20</td>
<td>Subsection Total: 3</td>
</tr>
<tr>
<td>A. Requirement that all agency policy decisions must be based on science subjected to external peer review</td>
<td>10</td>
<td>3</td>
</tr>
<tr>
<td>B. Original research documents are part of administrative record</td>
<td>10</td>
<td>0</td>
</tr>
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</table>
I. **Scientific Misconduct – (6/40 pts)**

A. **Political Manipulation of Science** (3/6 pts)
   1. *Prohibits alteration of technical/scientific documents for non-technical reasons (3/3 pts)*
      
      “Political officials should not suppress or alter, nor appear to suppress or alter, scientific or technological findings.”

   2. *Prohibits intimidation or coercion to alter scientific data/analysis/conclusions for non-technical reasons (0/3 pts)*

      The Department of Health and Human Service’s Scientific Integrity Policy does not address this.

B. **Breadth of Coverage** (3/5 pts)
   1. *Applies to political appointees and senior managers (3/3 pts)*

      Yes.

   2. *Applies to contractors, states, and other partners (0/2 pts)*

      The Department of Health and Human Service’s Scientific Integrity Policy does not address this.

C. **Whistleblower Protection** (0/12 pts)
   1. *Explicitly protects those filing misconduct complaints from retaliation (0/4 pts)*

      The Department of Health and Human Service’s Scientific Integrity Policy does not address this.

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

      The Department of Health and Human Service’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 Health and Human Service’s Scientific Integrity Policy does not address this.

D. **Investigations of Complaints** (0/5 pts)
   1. *Defined process (0/1 pt)*
The Department of Health and Human Service’s Scientific Integrity Policy does not address this.

2. **Timelines (0/1 pt)**

   The Department of Health and Human Service’s Scientific Integrity Policy does not address this.

3. **Ability of complainant to respond (0/1 pt)**

   The Department of Health and Human Service’s Scientific Integrity Policy does not address this.

4. **Transparency of findings and rationale (0/1 pt)**

   The Department of Health and Human Service’s Scientific Integrity Policy does not address this.

5. **Relationship with the IG is clearly defined (0/1 pt)**

   The Department of Health and Human Service’s Scientific Integrity Policy does not address this.

E. **Investigation Independent from Chain of Command (0/6 pts)**

   The Department of Health and Human Service’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 (0/2 pts)**

      The Department of Health and Human Service’s Scientific Integrity Policy does not address this.

   2. **Explicit procedure for discipline of sustained misconduct complaints (0/2 pts)**

      The Department of Health and Human Service’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 (0/2 pts)**

      The Department of Health and Human Service’s Scientific Integrity Policy does not address this.
II. Public Communications of Science – (14/40 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)

“HHS scientists may speak to the media and the public about scientific and technological matters based on their official work, with appropriate coordination with their immediate supervisor and the appropriate public affairs office."

“HHS permits and encourages [t]he publication of research findings in peer reviewed, professional or scholarly journals [and] The presentation of research findings at professional meetings . . . .”

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

“In no circumstances may public affairs officers ask or direct HHS scientists to alter their scientific findings.”

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

The Department of Health and Human Service’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.

III. Transparency of Agency Decision-Making – (3/20 pts)

A. Requirement that all agency policy decisions must be based on science subjected to external peer review (3/10 pts)

“Research and scientific study findings disseminated by HHS are subject to an external, objective peer review at both the inception stage and the pre-dissemination stage as part of the publication process in peer reviewed journals. Substantive reports from HHS statistical activities undergo a quality review process within their organizations before they are released, including expert review by supervisors, internal peer review by qualified scientists and statisticians, and, in some cases, external peer review as well as expert review by other offices prior to dissemination.”

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

“Because of confidentiality, ethical and feasibility constraints and legal obligations to third parties supplying the information, there may be instances where original or supporting data may not be available to the public, but HHS agencies typically will work
with owners of the data to facilitate understanding of the underlying data and resultant analysis, and transparency in data sources and methods will be emphasized in reports or reference documents.”