Scientific Integrity Report Card
Department of the Interior

Scientific Integrity Grading Rubric	**Total Possible:** 100 Points	**Total Awarded:** 60 Points
Scientific Misconduct	**Subsection Total: 40**	**Subsection Total: 20**
A. Political Manipulation of Science	6	6
B. Breadth of Coverage	5	5
C. Whistleblower Protection	12	0
D. Investigations of Complaints	5	5
E. Investigation Independent from Chain of Command	6	2
F. Sanctions for Misconduct	6	2
Public Communications of Science	**Subsection Total: 40**	**Subsection Total: 40**
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	10	10
B. Absence of policy review or agency screening for the above	10	10
C. Ability of scientists to review press releases regarding their work prior to final publication	10	10
D. Explicit provision for agency scientists to be on governing and editorial boards of scientific societies	10	10
Transparency of Policy Decision-Making	**Subsection Total: 20**	**Subsection Total: 0**
A. Requirement that all agency policy decisions must be based on science subjected to external peer review	10	0
B. Original research documents are part of administrative record	10	0

I. Scientific Misconduct – (20/40 pts)

A. Political Manipulation of Science (6/6 pts)

1. *Prohibits alteration of technical/scientific documents for non-technical reasons 3/3 pts)*

   Yes.

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

   Yes.

B. Breadth of Coverage (5/5 pts)

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

   Yes.

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

   Yes.

C. Whistleblower Protection (0/12 pts)

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

   No. The Department of the Interior's Scientific Integrity Policy promises only to "provide information to employees on whistleblower protections" without further specification.

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

   The Department of the Interior'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 the Interior's Scientific Integrity Policy does not address this.

D. Investigations of Complaints (5/5 pts)

1. *Defined process (1/1 pt)*

   Yes. Complaints should be submitted in writing to the Office of the Executive Secretariat and Regulatory Affairs (OES). A DSIO or BSIO will complete a preliminary investigation into the merits of a complaint. If the complaint has merit, it becomes an "allegation" and a Scientific Integrity Review Panel is convened.

2. *Timelines (1/1 pt)*

   Yes.

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

   Yes.

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

   Yes. The Scientific Integrity Review Panel must produce a written report.

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

   Yes. Scientific misconduct allegations that amount to fraud waste or abuse should be referred to the IG.

E. Investigation Independent from the Chain of Command (2/6 pts)

The Department of the Interior's Scientific Integrity Policy lost points because, even though it convenes a panel to review an allegation, there is guarantee that the reviewers are not in the chain of command or that they do not have a conflict of interest. All reviewers must be subject-matter experts from within the Department of the Interior. Additionally, the initial determination of whether an investigation is warranted is made by either the Departmental Scientific Integrity Officer (DSIO) or the Bureau Scientific Integrity Officer and the responsible manager, all of whom are in the chain of command. The responsible manager is the alleged violator's supervisor, unless he or she has a conflict of interest with the investigation.

F. Sanctions for Misconduct (2/6 pts)

1. *States that misconduct is grounds for disciplinary action or dismissal (2/2 pts)*

   Yes.

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

   No.

3. *Automatic review of court rulings based upon arbitrary and capricious application of scientific information or scientific findings (0/2 pts)*

   The Department of the Interior's Scientific Integrity Policy does not address this.

II. Public Communications of Science – (38/40 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 (8/10 pts)

Although the Department of the Interior promises to "[e]nsure that public communications policies provide procedures by which scientists and scholars may speak to the media and the public about scientific and scholarly matters based on their official work and areas of expertise[,]" no such procedures are specifically identified within the Scientific Integrity Policy. An online search revealed 470 DM 1, the Department of the Interior's Public Communications Policy, *available at* http://elips.doi.gov/ELIPS/DocView.aspx?id=3037. This policy addresses the process by which scientists may publish, speak, and lecture regarding their work.[1] The policy appears to restrict scientists from disclosing information in non-official publications or lectures that may be covered by a Freedom of Information Act exemption. Hence, full credit was not awarded.

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

The Department's Scientific Integrity Policy provides that "[i]n no circumstance may public affairs officers ask or direct Federal scientists to alter scientific findings." The Public Communications policy exempts scientific, scholarly, and technical material from review by the Office of Communications.

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

Although the Department of the Interior's Scientific Integrity Policy does not address this, the Public Communications Policy provides that "Scientists, scholars, engineers and other subject matter experts will be provided the opportunity to conduct a factual review of news releases concerning their work prior to publication to the extent practicable." Accordingly, full credit was awarded.

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 – (0/20 pts)

A. Requirement that all agency policy decisions must be based on science subjected to external peer review (0/10 pts)

The Department of the Interior's Scientific Integrity Policy does not address this.

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

[1] The Fish and Wildlife Service also has its own Public Communications Policy, *available at* http://www.fws.gov/policy/115fw1.html.

The Department of the Interior's Scientific Integrity Policy does not address this. Public access to decisional documents and data is only ensured to the degree currently provided by Department policy and regulations.