

NSF Scientific Integrity Policy

It is the policy of NSF to maintain a culture of scientific integrity in accordance with the President's March 9, 2009 Memorandum for the Heads of Executive Departments and Agencies on Scientific Integrity and the implementation guidance in the Office of Science and Technology Policy (OSTP) December 17, 2010 Memorandum (<http://www.whitehouse.gov/administration/eop/ostp/library/scientificintegrity>). NSF's policy applies to civil service employees; visiting scientists, engineers, and educators; those working at NSF under the Intergovernmental Personnel Act; and political appointees.

I. Foundations of Scientific Integrity at NSF

Production of data collections and research results should be objective and not influenced by financial interests or affiliations. Nor should scientific or technological findings be suppressed or altered by political officials. Award decisions are made following a rigorous merit review process. NSF expects the scientists and engineers who conduct our merit review process and make funding decisions to adhere to the highest standards of ethical conduct. Candidates for scientific and technical positions are selected on the basis of their knowledge, credentials, experience, and integrity.

NSF's internal procedures (http://www.nsf.gov/publications/pub_summ.jsp?ods_key=manual15) summarize the various government conflicts rules and provide clear standards governing conflicts of interest. NSF staff who report information on potential violations of rules and regulations are protected from retaliation; NSF participates in the Office of Special Counsel's (OSC) 2302(c) Certification Program which allows federal agencies to meet the statutory obligation to inform their workforces about the rights and remedies available to them under the Whistleblower Protection Act (WPA) and related civil service laws. (See: <http://www.nsf.gov/od/odi/nofear/notice.jsp> and <http://www.osc.gov/outreachAgenciesCertified.htm>.)

NSF awardees, whether current or prospective, also are expected to adhere to high standards of ethical conduct. All allegations of research misconduct should be reported promptly to the Office of the Inspector General (OIG) as required by NSF policy. (See: <http://www.nsf.gov/oig/misconscieng.jsp>; 45 CFR Part 689 http://law.justia.com/us/cfr/title45/45cfr689_main_02.html).

NSF awardees are also subject to the responsible conduct of research requirement of the America COMPETES Act of 2007 (Public Law 110-69). In accordance with Section 7009, NSF requires awardees to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduates, graduate students, and postdoctoral researchers who will be supported by NSF to conduct research. (For more information on NSF's implementation of Section 7009, please see <http://edocket.access.gpo.gov/2009/E9-19930.htm>.)

Facilitating the free flow of scientific and technological information and maintaining open communication are critical to NSF. The Foundation participates in the Administration's Open

Government Initiative (<http://www.nsf.gov/open>). Through this initiative, NSF publishes high-value datasets such as information on Freedom of Information Act requests, Graduate Research Fellowship Award recipients, abstracts of all funded NSF awards, and NSF funding rates. Another way that NSF facilitates the free flow of information is through Research.gov (<http://www.research.gov>), a portal that provides information on research spending and results. Research.gov publishes summaries of results of research supported by NSF. For awards made effective January 2010, the Foundation requires investigators to submit a brief summary, prepared specifically for the public, on the nature and outcomes of their NSF-funded award (See *Award & Administration Guide*, Chapter II: http://www.nsf.gov/pubs/policydocs/pappguide/nsf11001/aag_2.jsp.)

II. Public Communications

The Office of Legislative and Public Affairs (OLPA) is the authorized news media liaison for NSF. Within OLPA, the Public Affairs staff works to promote science, engineering and education research coverage in mainstream and targeted media, facilitating the *timely* release of *accurate* information. The overriding goal is openness and accessibility. This section represents an updated media policy as part of NSF's scientific integrity policy.

Media Policy: Purpose

NSF's media policy covers advisories, press releases, statements, interviews, news conferences, and other related media contacts. Public affairs staff facilitate the active dissemination of agency research results and coordinate media and public relations activities. A principal goal of public affairs is to help NSF most efficiently achieve its agency mission through sharing information based on sound and objective science.

Media Policy: Rights

NSF-funded scientists and NSF staff have the fundamental right to express their personal views, provided they specify that they are not speaking on behalf of, or as a representative of, the agency but rather in their private capacity. So long as this disclaimer is made, the employee is permitted to mention his or her institutional affiliation and position if this has helped inform his or her views on the matter.

Employees have the right to review, approve, and comment publicly on the final version of any proposed publication that significantly relies on their research, identifies them as an author or contributor, or purports to represent their scientific opinion. Under no circumstance may public affairs officers ask or direct NSF-funded scientists/engineers and staff to alter their scientific/technical findings.

Media Policy: Responsibilities

NSF's public affairs office is responsible for:

- promoting media attention on important scientific and institutional developments;
- coordinating and facilitating contact between journalists and the requested agency staff;

- providing both reporters and scientists with timely, accurate, and professional media assistance; and
- providing draft press releases or other public statements to agency scientists whose work is included, to assure the accuracy of scientific information being communicated.

NSF employees are responsible for:

- working with the agency's public affairs staff to make significant research developments accessible and comprehensible to the public;
- ensuring the accuracy and integrity of their communications; and
- consulting with the public affairs office prior to any communications with media representatives.

Media Policy: Media and Public Interactions

To help NSF public affairs best fulfill its responsibilities, agency employees should:

- keep the public affairs office informed of any media interest or potential for interest in their work;
- notify the public affairs office of impending media contacts and provide the public affairs office with a recap of the media conversation afterward;
- review drafts of press releases written by staff from the public affairs office both for their format and non-scientific content, as well as for the accuracy of scientific information being communicated;
- work with the public affairs office to review presentations or news conferences for their format and content to assure the accuracy of scientific information being communicated.

NSF's public affairs officers should:

- respond to all initial media inquiries as soon as possible, but seeking to respond within 30 minutes whenever possible;
- do all they can to help reporters get the appropriate information needed for an article;
- know the reporter's deadline to ensure timely response;
- provide contact information where they will be available, even after hours, on weekends, and on holidays;
- draft press releases and/or other multimedia products whenever warranted;
- ensure a timely turnaround on press releases (within one week or less);
- develop (or coordinate the development of) talking points in collaboration with the relevant experts for the release of scientific papers and other agency products;
- assure agency compliance with the No Fear Act (a federal law that holds agencies accountable for violations of employee protection laws) by informing employees of their rights under federal anti-discrimination and whistleblower protection laws.

Media Policy: Media Coverage

In the spirit of openness, media representatives should be granted access to open meetings of NSF advisory committees, open sessions of the National Science Board meetings, and other

meetings open to the public and convened by NSF, as well as permission to reasonably use tape recorders, cameras, and electronic equipment for broadcast purposes in these public meetings.

The public affairs officer coordinating a meeting may be present, or consulted, to undertake all responsibilities of a news media nature, including but not restricted to necessary physical arrangements.

It shall be the responsibility of the public affairs office to cooperate fully with and accede to all reasonable requests from news media representatives. In instances where disputes or misunderstandings may arise from the expressed views, wishes, or demands on the part of news media representatives, such matters should be referred at once to the head of NSF's Office of Legislative and Public Affairs for resolution.

Media Policy: Scope

Below are examples of the types of information that NSF considers within and outside the scope of the policy guidelines. Neither of these lists should be considered comprehensive.

A. Covered Information

- NSF-generated reports, brochures, documents, newsletters, and audiovisual products;
- Oral information, including speeches, interviews, expert opinions only if representing NSF's views, official positions, or policies;
- Science & Engineering Indicators and other reports of a statistical nature, which includes statistical analyses, trend data, etc., aggregated by the National Science Board and NSF's National Center for Science and Engineering Statistics.

B. Information Not Covered

- Documents or multimedia materials not authored by NSF and not representing official views, including research supported by NSF funding;
- Opinions where the presentation makes it clear that what is being offered is personal opinion rather than fact or NSF's views;
- Information dissemination limited to government employees or agency contractors or grantees;
- Information intended solely for intra- or inter-agency use or sharing of government information, such as budget discussions, National Science Board and NSF deliberations, and other information that serves to assess the success in achieving the agency's objectives, programs, training materials, manuals, etc.;
- Information intended to be limited to public filings, subpoenas, or adjudicative processes.

Media Policy: Types of Information Disseminated by NSF to the Public

Annually, NSF produces hundreds of various types of outreach and communication materials and provides thousands of pages of Web content for access by the public. NSF's public affairs

office works with university and institution public information offices to generate and distribute content.

Types of Dissemination

NSF disseminates information through a wide range of methods, using more than one medium for the same information. In light of the Paperwork Reduction Act of 1995, NSF strives to publish most of its print products in electronic, rather than paper, format.

- Print: including limited quantities of NSF's Strategic Plan, Science & Engineering Indicators, National Science Board special reports, etc.;
- Electronic: such as NSF websites, Listservs, e-mail, social media sites such as Facebook, Twitter, YouTube and Flickr;
- Audiovisual: audio or video programs, media webcasts, slideshows, powerpoint presentations by the agency Director and Deputy Director;
- Oral: formal speeches, oral presentations, lectures, and interviews for publication or broadcast.

Media Policy: Guidelines for the Media

NSF's public affairs office has established these guidelines. They are available online at http://nsf.gov/news/policies_for_media.jsp.

When seeking information about NSF, or interviews with NSF leadership or staff, we ask that media contact Public Affairs for assistance. Our Public Affairs media team members, their contact information and the "beats" they cover are listed at <http://www.nsf.gov/news/olpastaff.jsp>.

When you interview a member of NSF leadership or staff, a member of the media team may sit in/listen in on the interview. Our goal is to support the interviewee and to assist you with any follow-up information needed.

If you contact us during normal business hours (East Coast time), you can expect a return call or message as soon as possible, within 30 minutes of your call or message, or at the most, the same day. We will do all we can to respond to your query by your deadline.

We will always provide you with accurate information and will work to put you directly in contact with the best expert to respond to your questions. Be aware that there are circumstances where the information we can provide is limited. These include details about possible or ongoing investigative work, pre-decisional budget data, and NSF personnel records.

When we provide editorial content to media, as with our partnerships with LiveScience.com and *U.S. News and World Report*, the content is clearly labeled as such.

We encourage you to make use of resources available on our website. Images and video in our press releases and Discovery feature stories are generally available for your use. Credit information and any restrictions on use will be listed with the image or video. Our Multimedia Gallery at <http://www.nsf.gov/news/mmg/> offers images, videos and audio files, and is searchable by topic. Remember to check for credit information and any restrictions on use.

Our National Center for Science and Engineering Statistics (NCSES) site at <http://www.nsf.gov/statistics/> provides useful statistics about the science and engineering enterprise, and links to the biennial *Science and Engineering Indicators*, published by the National Science Board.

III. Use of Federal Advisory Committees (FAC)

NSF's scientific advisory committees provide advice and recommendations to NSF concerning support for science research and education. This may include advice on program management, overall program balance, and other aspects of program performance; on the impact of NSF research support and NSF-wide policies on the scientific community; and on potential science and research thrusts, long-range plans and partnership opportunities.

NSF invites suggestions for FAC membership on the NSF web page (http://www.nsf.gov/about/performance/dir_advisory.jsp). In addition, NSF issues a Federal Register notice at least once a year to alert a wider audience to the NSF Advisory Committees. Since vacancies come up on an ad hoc basis, the Federal Register notice covers NSF's scientific Advisory Committees and refers persons interested in serving as members or recommending members to the point of contact for the specific Committee.

NSF provides biographical information for FAC members on the FAC web pages (http://www.nsf.gov/about/performance/dir_advisory.jsp). Selection of FAC members is based on expertise, knowledge, and contribution to the relevant subject areas. Selection is at the discretion of the Assistant Director/Office Head or some combination of these senior management officials. NSF follows the U.S. General Services Administration guidance on membership balance (<http://www.gsa.gov/portal/category/21242>).

To the extent permitted by law, the NSF Designated Agency Ethics Official provides copies of all Conflict of Interest waivers granted to FAC members to the respective Designated Federal Official to be posted on the appropriate FAC web site.

NSF applies the following disclaimer on all FAC reports, recommendations, and products, unless there is prior agreement to do otherwise:

"The function of Federal advisory committees is advisory only. Any opinions, findings, conclusions, or recommendations expressed in this material are those of the Advisory Committee, and do not necessarily reflect the views of the National Science Foundation."

IV. Professional Development of Government Scientists and Engineers

NSF has a strong commitment to ensuring that its staff remains at the cutting edge of the nation's workforce by fostering a culture of continuous learning. To that end, NSF permits staff (including scientists and engineers) to pursue research and developmental activities related to NSF's mission and goals such as attending or giving presentations at conferences or involvement in committees on Government time.

NSF also allows its staff to participate in any research or educational institution, scientific society, professional association or editorial board, provided written permission is obtained from the scientist's or engineer's supervisor and ethics counselor.

V. Implementation

To ensure continued implementation of the policy, NSF has established an email alias for scientific integrity comments or questions: scientificintegrity@nsf.gov.