

Scientific Integrity Report Card
U.S. Department of Agriculture

Scientific Integrity Grading Rubric	Total Possible: 100 Points	Total Awarded: 33 Points
Scientific Misconduct	Subsection Total: 40	Subsection Total:12
A. Political Manipulation of Science	6	2
B. Breadth of Coverage	4	5
C. Whistleblower Protection	12	4
D. Investigations of Complaints	6	1
E. Investigation Independent of Chain of Command	6	0
F. Sanctions for Misconduct	6	0
Public Communications of Science	Subsection Total: 40	Subsection Total:16
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	4
B. Absence of policy review or agency screening for the above	10	2
C. Ability of scientists to review press releases regarding their work prior to final publication	10	0
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:5
A. Requirement that all agency policy decisions must be based on science subjected to external peer review	10	5
B. Original research documents are part of administrative record	10	0

I. Scientific Misconduct – (12/40 pts)

A. Political Manipulation of Science (2/6 pts)

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

The USDA's Scientific Integrity Policy and its Implementation Handbook never outright prohibit this. The closest it gets is...

"USDA is committed to a culture of scientific integrity. Science, and public trust in science, thrives in an environment that shields scientific data and analyses and their use in policy making from political interference or inappropriate influence. Scientific and technical findings should not be suppressed or altered for political purposes."

2. *Prohibits intimidation or coercion to alter scientific data/analysis/conclusions for non-technical reasons (1/3 pts)*

The USDA's Scientific Integrity Policy and its Implementation Handbook never outright prohibit this. The closest it gets is...

"USDA is committed to a culture of scientific integrity. Science, and public trust in science, thrives in an environment that shields scientific data and analyses and their use in policy making from political interference or inappropriate influence. Scientific and technical findings should not be suppressed or altered for political purposes."

B. Breadth of Coverage (5/5 pts)

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

Yes.

"This policy applies to...

(2) All USDA employees, political and career, who engage in, supervise, or manage scientific activities, analyze and/or publicly communicate information resulting from scientific activities, or who utilize the information in decision making."

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

Yes.

"This policy applies to:

(3) All contractors, cooperators, partners, permittees, lessees, and grantees that assist with developing or applying the results of scientific and technical activities on behalf of USDA."

C. Whistleblower Protection (4/12 pts)

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

Yes.

“It is USDA policy to protect those who uncover and report allegations of research misconduct or other violations of scientific integrity, as well as those accused of violations of scientific integrity or research misconduct in the absence of a finding of misconduct, from prohibited personnel practices (as defined in 5 U.S.C. 2302(b)).”

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

This is not addressed in USDA’s Scientific Integrity Policy or its Implementation Handbook.

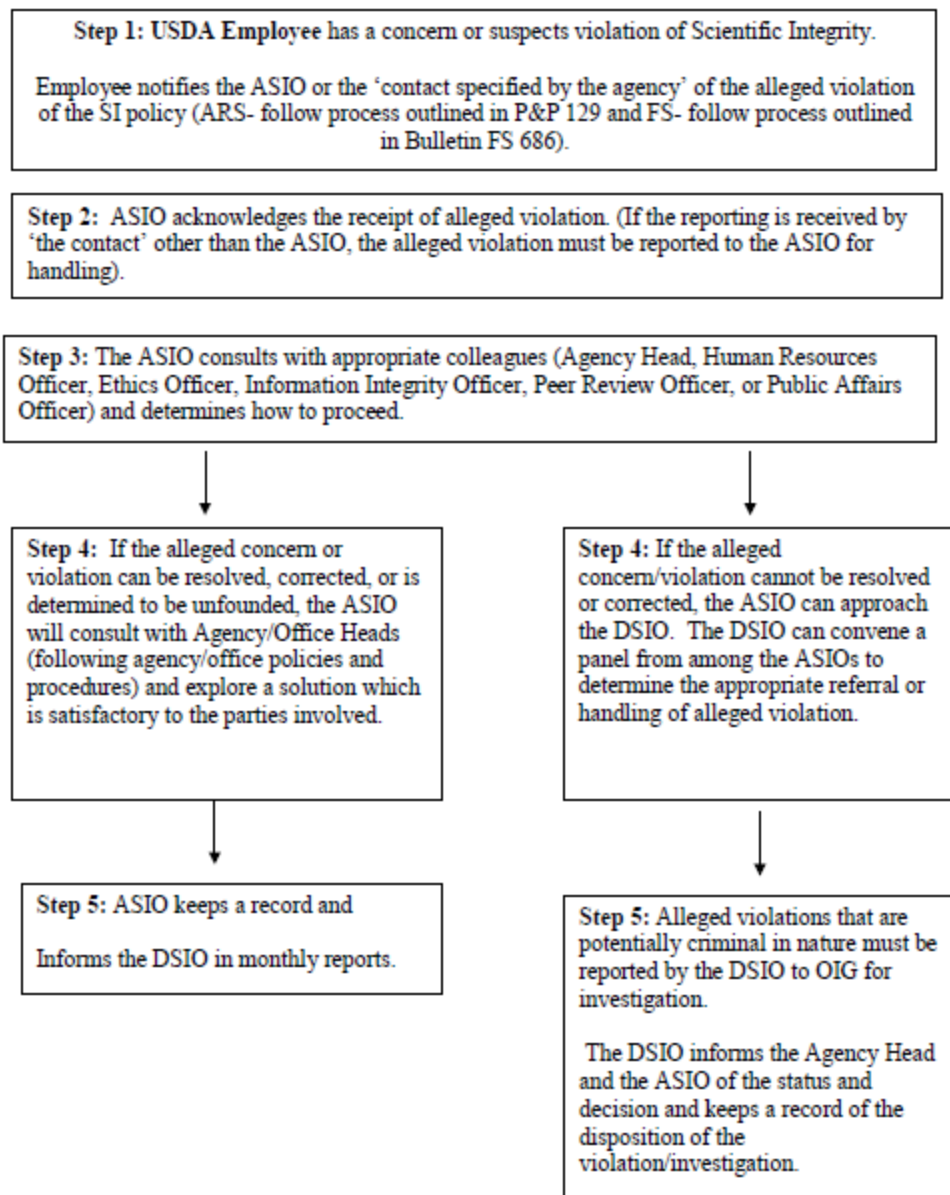
3. *Provides that agency officials who engage in retaliation will be subject to discipline (0/4 pts)*

This is not addressed in USDA’s Scientific Integrity Policy or its Implementation Handbook.

D. Investigations of Complaints (1/5 pts)

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

Yes.



2. *Timelines (0/1 pt)*

This is not addressed in USDA's Scientific Integrity Policy or its Implementation Handbook.

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

This is not addressed in USDA's Scientific Integrity Policy or its Implementation Handbook.

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

This is not included in USDA's Scientific Integrity Policy or its Implementation Handbook.

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

The IG is not mentioned in the USDA's Scientific Integrity Policy or its Implementation Handbook.

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

USDA's Scientific Integrity Policy and its Implementation Handbook specifically require the ASIO, who may or may not be in the chain of command, to consult with someone who is, the Agency Head.
See I.D.1.

F. Sanctions for Misconduct (0/6 pts)

1. *States that misconduct is grounds for disciplinary action or dismissal (0/2 pts)*

This is not addressed in USDA's Scientific Integrity Policy or its Implementation Handbook.

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

This is not addressed in USDA's Scientific Integrity Policy or its Implementation Handbook.

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

This is not addressed in USDA's Scientific Integrity Policy or its Implementation Handbook.

II. Public Communications of Science – (16/40 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 (4/10 pts)

The USDA's Scientific Integrity Policy encourages its employees to interact with the media and publish/present their findings in professional settings. It provides processes to follow for some, but not all, instances of doing so.

The USDA's Scientific Integrity Policy encourages its scientists, engineers, and analysts "interact with the broader scientific community in a manner that is consistent with the Federal rules of ethics, job responsibilities, and existing agency policies," including publication of research findings in peer-reviewed, professional or scholarly journals and presenting research findings at professional meetings."

“It is USDA policy to support scientific integrity in the communication of scientific findings and products, including:

(1) Encouraging, but not requiring, USDA scientists to communicate with the media about their scientific findings. Scientists are expected to coordinate with their immediate supervisor and public affairs office, in accordance with the policies of their specific agencies. Agencies are expected to coordinate with the Office of Communications (OC,) which provides a centralized operational direction for communications about the work of the Department.”

“USDA employees may, during duty hours, prepare books, articles, and other materials for publication by nongovernmental organizations if such preparation is within the scope of their official duties and in accordance with applicable statutes and regulations. If the material treats a subject that interprets the policies of the USDA or deals with sensitive areas of any USDA program, the originating agency's information head must first submit the material to OC for review and clearance. Such materials should be submitted to OC at least 10 working days before they are offered to nongovernmental organizations for publication.”

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

The USDA’s Scientific Integrity Policy and its Implementation Handbook does place some limitations on the Office of Communication’s role in approving media communication.

“OC’s role in communications regarding research and analysis by USDA scientists and researchers is to assist with presentation, style, and logistics of the communication and to advise on potential media requests or media outreach strategies.”

The Office of Communications, similarly, must allow the free dissemination of scientists’ and researchers’ work, regardless of the conclusions discovered through such scientific inquiry, and should not interfere so as to fit a political agenda of any Administration.”

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

This is not addressed in USDA’s Scientific Integrity Policy or its Implementation Handbook.

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

Yes.

“It is USDA policy to encourage its scientists, engineers, analysts and other professionals to interact with the broader scientific community in a manner that is consistent with Federal conflict of interest statutes, Standards of Ethical Conduct, job responsibilities, and existing agency policies, including...

- (3) Serving as editors or editorial board members of professional or scholarly journals;
- (4) Participating in professional societies, committees, task forces and other specialized bodies of professional societies, to the extent and in the manner permitted by law”

According to the USDA’s Scientific Integrity Policy Implementation Handbook, an employee must obtain permission from his or her supervisor to serve in a professional group in an official capacity when it does not create a fiduciary duty with the organization. When a fiduciary duty to the organization is created, the employee must comply with OGE Legal Advisory, LA-13-05, available at [http://www.oge.gov/OGE-Advisories/Legal-Advisories/LA-13-05---18-U-S-C--%C2%A7-208\(b\)\(2\)-Exemption-for-Official-Participation-in-Nonprofit-Organizations/](http://www.oge.gov/OGE-Advisories/Legal-Advisories/LA-13-05---18-U-S-C--%C2%A7-208(b)(2)-Exemption-for-Official-Participation-in-Nonprofit-Organizations/)

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)

The USDA’s Scientific Integrity Policy and its Implementation Handbook reference the peer review requirements in the OMB Final Information Quality Bulletin for Peer Review. The OMB Bulletin states, “agencies are granted broad discretion to weigh the benefits and costs of using a particular peer review mechanism for a specific information product.”

“It is USDA policy, “when considering scientific or technological information in deriving policy decisions, to ensure the quality, accuracy and transparency of that information:

- (1) Use information based on well-established scientific processes, including appropriate peer review and public input, consistent with the OMB Final Information Quality Bulletin for Peer Review;”

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

The USDA’s Scientific Integrity Policy and its Implementation Handbook do not address this.

“It is USDA policy, when considering scientific or technological information in deriving policy decisions, to ensure the quality, accuracy and transparency of that information, including:

- 3) Make scientific findings or conclusions considered or relied on in policy decisions publicly available online and in open formats, to the extent practicable, consistent with the Administration’s Open Government Initiative, the Freedom of Information Act, the Administrative Procedure Act, and other applicable statutes, regulations or document handling procedures and policies;””