

# Proposed Revisions To Integrity In Research And Procedures For Investigating Allegations Of Research Misconduct

Llewellyn Joseph Gibbons, Research Integrity Officer  
6 April 20-Graduate Council



## I WOULD LIKE TO THANK EVERYONE FOR COOPERATING IN THE SEMI-ANNUAL RESPONSIBLE CONDUCT OF RESEARCH PROGRAM

**YOU SUSPECT RESEARCH MISCONDUCT NOW WHAT?**

**IF YOU ARE SUSPICIOUS**

- AVOID CONFRONTATION**  
Direct confrontation may lead to retaliation or tampering with evidence.
- KEEP NOTES**  
Document details and save communications related to the misconduct. This will help you recall important information needed by the institution.
- CONSULT YOUR RESEARCH INTEGRITY OFFICER (RIO)**  
RIOs can help you better understand the situation. You can speak in hypotheticals as you consider making an official allegation.

**EDUCATE YOURSELF**  
Read your institution's research misconduct policy or contact the U.S. Office of Research Integrity (ORI) with questions.

**SEEK SUPPORT**  
You may want to get advice from someone you trust to help you consider all options.

**THINGS TO CONSIDER**

**REPORTING MISCONDUCT IS DIFFICULT...BUT IT CAN BE WORTH IT.**

**PEOPLE OFTEN WORRY ABOUT:**

- The reputation and career of the accused
- How others in the lab will be affected
- Implications for their own career
- Possible retaliation

**REPORTING MISCONDUCT HELPS:**

- Prevent false and misleading information from entering the research record
- Correct the scientific literature
- Ensure funding is awarded to responsible research
- Protect the public's trust in science

**BE SPECIFIC**  
Provide the RIO with specific examples of suspected misconduct and where it occurred (e.g. manuscripts, presentations, posters, grant applications, etc.).

**BE AVAILABLE**  
The RIO may require your help identifying and preserving evidence, explaining how the research was falsified, fabricated, or plagiarized, and cooperating as a witness.

**BE PATIENT**  
Research misconduct proceedings take considerable effort and time to complete.

**BE PREPARED FOR SILENCE**  
Institutional policies may limit your access to confidential information about research misconduct proceedings.




### 5 QUALITIES OF GOOD RESEARCH MENTORS

"A mentor is a person who has achieved career success and counsels and guides another for the purpose of helping him or her achieve like success."<sup>1</sup>

- RESPECTFUL**  
Demonstrates respect for all laboratory members, which reduces fear and unhealthy competitiveness.
- SUPPORTIVE**  
Supports mentees by acknowledging accomplishments and challenging mentees to develop skills that advance their careers.
- AVAILABLE**  
Establishes open and responsive communication with mentees, which promotes research integrity and discourages questionable research practices.
- PREPARED**  
Anticipates the needs of mentees and is prepared to provide assistance and guidance.
- HONEST**  
Sets high standards for honest reporting of data, regardless of whether the data supports the desired outcome.

Respondents in over 50% of ORI's findings of research misconduct are postdocs, students, technicians, and research assistants.<sup>2</sup>

## SECOND UPDATE ON REVISIONS

<b>Name of Policy:</b> <a href="#">Policy on integrity in research and procedures for investigating allegations of research misconduct</a>		
<b>Policy Number:</b> 3364-70-21		
<b>Approving Officer:</b> President		
<b>Responsible Agent:</b> Vice President of Research		
<b>Scope:</b> All University of Toledo Campuses		<b>Review/Revision date:</b> October 4, 2018
		<b>Original effective date:</b> December 14, 2009
	New policy proposal	Minor/technical revision of existing policy
X	Major revision of existing policy	Reaffirmation of existing policy

<b>Approved by:</b>  <i>sg</i> Sharon L. Gaber, Ph.D. President  <b>October 12, 2018</b> Date  <i>Review/Revision Completed by:</i> Senior Leadership Team, Vice President of Research	<b>Policies Superseded by This Policy:</b>  <ul style="list-style-type: none"> <li>• III-2-2 Art. II Compliance with External and Internal Policies, Section 6 Misconduct in Research</li> <li>• 02-003 Academic and Scientific Misconduct</li> </ul> Initial effective date: December 14, 2009  Review/Revision Date: October 9, 2017, August 2018  Next review date: October 4, 2021
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## MAJOR REVISIONS (LEFT OLD/RIGHT NEW)

culty or staff on leave without pay. These procedures apply to students only when acting in their employment or research service capacity or if they are involved in federally supported research or scholarship. If the respondent is no longer employed by

This Policy applies to students only when acting in their employment or research service capacity, if they are involved in federally funded (or other sponsored) research or scholarship or engaged in research (or collaborating in research with a faculty or staff member) with a goal of a publication, conference, poster, or paper presentation, grant application, grant, prize, or award. It does not apply to internal normal classroom, for-credit, or degree related academic research or scholarship activity that will not be disseminated outside of the University. The research integrity officer and the student's dean, department or program chair, or another person identified by the college dean will resolve disputes regarding this Policy's application to students.

The policy was revised to hopefully make the scope of the policy as applied to student's clearer. The goal is that only research that goes outside of the University will be covered while excluding normal academic activities.



## (2) DEFINITION OF RESEARCH MISCONDUCT-MAJOR CHANGES

### (2) Research misconduct:

- (a) Research misconduct is fabrication, falsification, or plagiarism in proposing, performing, or reviewing research or scholarship, or in reporting research or scholarship results.
- (i) Fabrication is making up data or results and recording or reporting them.
  - (ii) Falsification is manipulating research materials, equipment, or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.
  - (iii) Plagiarism is the appropriation of another person's ideas, processes, results, or words without giving appropriate credit.
  - (iv) Deliberate violation of regulations is research misconduct and includes flagrant failure to adhere to or receive the required approvals for work under regulations of federal, state or local agencies, or University policies. Examples include, but are not limited to, guidelines for: protection of human and animal subjects, use of hazardous chemicals, biologicals, radioactive materials, and export controlled research.
- (b) Research misconduct does not include honest error or differences of opinion.
- (c) A finding of misconduct requires that there be a significant departure from accepted practices of the relevant research community. The misconduct must be committed intentionally, knowingly, or recklessly; and the allegation be proven by a preponderance of the evidence.

### (27) Research Misconduct:

- (a) Research misconduct is fabrication, falsification, or plagiarism in proposing, performing, or reviewing research or scholarship or reporting research or scholarship results.<sup>17</sup>
- (i) Fabrication is making up data or results and recording or reporting them.<sup>18</sup>
  - (ii) Falsification is manipulating research materials, equipment, or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.<sup>19</sup>
  - (iii) Plagiarism is appropriating another person's ideas, processes, results, or words without giving appropriate credit.<sup>20</sup> Plagiarism includes both the theft or misappropriation of intellectual property and the substantial unattributed textual copying of another's work.
- (1) The theft or misappropriation of intellectual property includes the unauthorized use of ideas or unique methods obtained by privileged communication, such as a grant or manuscript review.

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## MAJOR REVISION TO PLAGIARISM

- (iii) Plagiarism is appropriating another person's ideas, processes, results, or words without giving appropriate credit.<sup>20</sup> Plagiarism includes both the theft or misappropriation of intellectual property and the substantial unattributed textual copying of another's work.
- (1) The theft or misappropriation of intellectual property includes the unauthorized use of ideas or unique methods obtained by privileged communication, such as a grant or manuscript review.

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## PLAGIARISM CONTINUED

- (2) Substantial unattributed textual copying of another's work means the unattributed verbatim or nearly verbatim copying of sentences and paragraphs that materially mislead the ordinary reader regarding the author's contributions.
- (3) Plagiarism does not include the limited use of identical or nearly identical phrases which describe a commonly used methodology or previous research unless these uses are substantially misleading to the reader or of great significance.
- (4) Plagiarism generally does not include disputes regarding the use of intellectual property, authorship, or credit disputes growing out of collaborative research or scholarship.<sup>21</sup>

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## NEW “SPOILAGE”

- (v) The destruction, absence of, or Respondent's failure to provide research records adequately documenting the research related to the research misconduct proceeding is evidence of research misconduct, if the committee finds by the preponderance of the evidence that:
- (1) the Respondent intentionally, knowingly, or recklessly had research records and destroyed them,
  - (2) had the opportunity to maintain the records but did not do so,
  - (3) maintained the records and failed to produce them upon request, or
  - (4) failed to create or maintain records reasonably related to his or her research and that
  - (5) the Respondent's conduct regarding the research record constitutes a significant departure from accepted practices

of the relevant research community.<sup>23</sup>

This is not a new form of research misconduct. It merely permits the investigation committee to use the absence or destruction of the research record as evidence of research misconduct.

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## SENIOR FACULTY

- (12) Senior Faculty: is a faculty member who has either (i) achieved tenure in a tenure track position or (ii) has achieved the rank of associate or full professor in a tenure track eligible position or (iii) has a minimum of 5 years' of professional experience in a clinical position with a demonstrated record of research/scholarly activities.

These changes will increase the number of faculty members eligible to serve and clarify who is eligible to serve.

- (31) Senior Faculty: A senior faculty member is a person who:
- (a) achieved or is recommended for tenure,
  - (b) has attained the rank of associate or full professor in a tenure track position,
  - (c) has a minimum of 5 years of professional experience in a clinical or equivalent position, including as a lecturer, with a demonstrated record of research or scholarly activities,
  - (d) has an appointment to the Research Council, or is recommended by the Research Council,
  - (e) holds the rank of emeritus or retired from a position that otherwise constitutes senior faculty,
  - (f) is a full or associate member of the graduate faculty, or
  - (g) holds or held an equivalent rank as described in (a)-(f) at another institution.

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## NEW-SEQUESTRATION

- (32) Sequestration: Sequestration is the taking possession or control of records and materials, including the research record, potentially related to the research misconduct allegation. The RIO must sequester the relevant research records or other evidence to the extent possible before notifying the Respondent of the allegation. The RIO shall maintain custody of the sequestered materials. Only individuals necessary to investigate the allegation or preserve the sequestered materials will have access. The RIO will attempt to minimize the impact of sequestration on the Respondent or other researchers by taking reasonable steps to make the originals or copies of sequestered materials or equipment available to the Respondent or other researchers.

New obligation on RIO to minimize impact on on-going research.

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## NEW PROVISION REGARDING COSTS

- (5) The Office of Research and Sponsored Programs shall provide appropriate expertise and reasonable administrative support to the RIO and the inquiry panel or investigation committee. The Office of Research and Sponsored Programs will charge additional expenses incurred due to the inquiry or investigation to the

college, department, or program of the Respondent's primary appointment.

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## NEW SPONSORED RESEARCH

- (a) The National Science Foundation, the Public Health Service, and other federal agencies have formal regulations or policies regarding the investigation of allegations of research misconduct involving activities supported by those agencies (See appendix A). Each of these regulations contains a definition of research misconduct, prescribes certain time limits for inquiries and investigations, and requires reporting to the agencies under certain conditions and at specified stages in the process. The University will comply with these regulations or policies.
- (b) State, local, or private funding sources (sponsors) may have their policies governing research misconduct proceedings. The University may also have memorandums of agreement, cooperation agreements, or other understandings with other institutions regarding how to process allegations of research misconduct. The RIO, in consultation with the Office of the General Counsel, will determine the applicability of external regulations or agreements in each particular case. The University will comply with the requirements of the sponsor policies or University agreements. If an agreement, policy, or regulation other than or in addition to this Policy may

In case of a conflict between UT policy and sponsor policy, UT will follow sponsor's policy.

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## PROCEDURAL CHANGES

- (i) The purpose of the assessment is to determine if an inquiry is warranted. An inquiry is warranted if the allegation falls within the definition of research misconduct under this policy and is sufficiently credible and specific so that potential evidence of research misconduct may be identified.
- (ii) The RIO will assess the allegation in consultation with at least three impartial senior faculty members (with a faculty appointment below the Dean level) identified by the RIO. The RIO will provide a description of allegations to the faculty members participating in assessment via electronic mail. Assessment will be initiated within 5 business days of receipt of the allegation.

### (a) General Comments

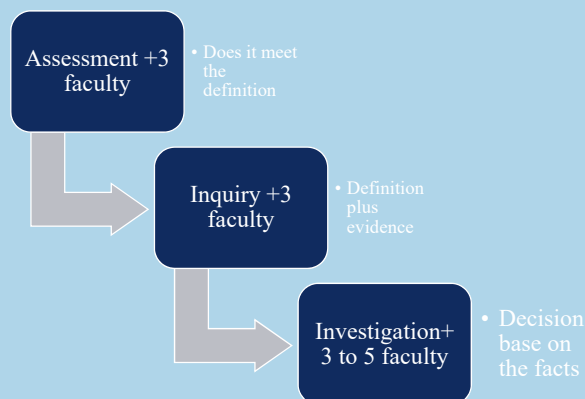
- (i) All assessments, inquiries and investigations will be reviewed and generally will be carried through to completion, and all significant issues will be pursued diligently.
- (ii) The RIO may close an allegation of research misconduct with the approval of the DO at the inquiry or investigation stage on the basis that the Respondent has admitted responsibility, if the applicable federal agency or sponsoring organization's requirements regarding early termination of the research misconduct proceeding are met.

The RIO can now CLOSE an allegation without bringing the allegation to a faculty assessment committee--the Assessment Committee has been eliminated. This is in keeping with what most schools do. This frees three potential faculty members to serve on the inquiry panel or investigation committee.

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## UT Existing Process-9 To 11 Faculty Members



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## ALLEGATIONS-NEW

### Allegations<sup>27</sup>

- (i) In conducting the initial assessment, the RIO may rely solely on the information contained in the allegation to determine whether to constitute an inquiry panel.
- (ii) Within five days of receipt of the allegation, the RIO will initiate the allegation's initial assessment.
- (iii) The RIO shall determine whether the allegation falls within the definition of research misconduct under this Policy, is sufficiently credible, contains sufficient information so that potential evidence of research misconduct may be identified and whether to constitute an inquiry panel.
- (iv) If the RIO determines that the allegation warrants an inquiry panel, the RIO shall prepare an initial assessment referral, which explains the basis for the determination. The RIO shall transmit copies of the initial assessment referral to the Respondent. The RIO shall also notify the complainant of the initial assessment outcome and may provide the complainant with a summary of the initial assessment referral.
- (v) If the allegation does not warrant an inquiry, the RIO shall prepare an initial assessment report that states the basis for the RIO's determination. The RIO shall inform the complainant and provide the Research Council information regarding the general nature of the allegation and the basis for the RIO's initial assessment not to proceed to an inquiry panel. If the Research Council disagrees, the RIO will refer the allegation to an inquiry panel.

If the allegation meets the definition of research misconduct the RIO constitutes an inquiry panel, if not RIO reports the allegation in summary form to RC, if RC disagrees RIO refers to inquiry panel.

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## INQUIRY PANEL PROCESS

- (xiv) In the case of the inquiry into an allegation of research misconduct where the University is cooperating or collaborating with another institution, the RIO may appoint one or more members of the other institution as inquiry panel members or observers. The RIO, when constituting an inquiry panel, shall state the scope of the involvement of the other institution's representative(s).

Utoledo is doing more collaborative work with other institutions. This provides a method for collaboration between the two institutions.





## INQUIRY PANEL (NEW)

- (xx) New allegations by the inquiry panel against someone other than the Respondent will require that the RIO notify the new Respondent of the allegations and provide the new Respondent with an opportunity to object to the current inquiry panel members on the basis of a conflict of interest in sufficient and specific detail to allow the RIO to decide the committee member's service on the inquiry panel.<sup>29</sup>
- (xxi) The RIO has the discretion to permit the current inquiry panel to proceed in evaluating the allegation against the new Respondent or to constitute a new inquiry panel, in whole or in part, on the grounds of a conflict of interest of a member of the existing inquiry panel.

This is to avoid creating a new inquiry panel or delaying the proceeding.

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## INVESTIGATION

- (i) The formal investigation into an allegation of research misconduct is the responsibility of the investigation committee. The investigation committee is responsible for developing the factual record, weighing of the evidence, making credibility and factual findings, and submitting a report with its findings and recommendations to the RIO and DO.

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## COLLABORATION WITH OTHER INSTITUTIONS

- (4) In the case of the investigation into an allegation of research misconduct where the University is cooperating or collaborating with another institution, the RIO may appoint one or more members of the other institution as

investigation committee members or observers. However, the majority of voting members must be University of Toledo senior faculty. The RIO shall state in the appointment letter the scope of authority of the other institution's representative. The Respondent must be informed as to the nature and extent of the collaboration with the other institution regarding the investigation into the allegation of research misconduct.

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## COLLABORATION . . .

- (5) The Respondent may object to a non-University of Toledo member's service as an investigation committee member on the same basis as an objection to University of Toledo investigation committee member.

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## NEW REPLACE COMMITTEE MEMBERS

- (7) The RIO may excuse investigation committee members at any time because of a conflict of interest or for other good cause. The RIO will then notify the Respondent of a proposed replacement, and the Respondent will have five days to object to the proposed replacement on the grounds of a conflict of interest. Once appointed, the replacement must review the recordings, transcripts, and other evidence at the earliest opportunity.

The goal is to be able to replace committee members because of illness, subsequent discovery of conflicts of interest, etc.

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## NEW ALLEGATIONS AGAINST NEW RESPONDENT

- (xvi) The investigation committee may discover information leading to a new allegation against someone who is not the Respondent. A new allegation against someone other than the Respondent will require that the RIO notify the new Respondent of the allegation and provide the new Respondent with an opportunity to object to the members of the current investigation committee within five days on the grounds of a conflict of interest. The RIO has the discretion to add a new charge to the investigation committee then permit the current investigation committee to proceed to investigate the allegation against the new respondent or refer the new allegation to an inquiry panel or a new investigation committee.<sup>31</sup>

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## NEW--

- (iv) The Respondent has the burden of proving by a preponderance of the evidence any affirmative defenses raised, including honest error or a difference of opinion. The Respondent has the burden of proving by the preponderance of the evidence that the alleged conduct that constituted misconduct was in good faith, inadvertent, accidental, or that the alleged misconduct was not a significant deviation from the research norms of the relevant area or discipline of research.<sup>32</sup> Because the relevant area of research of the allegation is not necessarily the same as the discipline of the Respondent's primary appointment, the committee shall determine the relevant area of research.<sup>33</sup>

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## NEW INVESTIGATION COMMITTEE GUIDANCE ON “RECOMMEND ACTIONS”

- (12) Future administrative actions by the DO (including sanctions, if any), recommended by the Investigation Committee are committed to its sound discretion. However, an Investigation Committee finding that misconduct has occurred should also include recommended disposition by the DO. The recommendation may include:
- (a) limitations on future research, grant applications or grants,
  - (b) limitations on supervising or employing research personnel or students,
  - (c) informal oral or formal written reprimands,

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- demotion, or discharge,
- (d) remedial actions appropriate for the resolution of the matter, such as correction of the public research record, including publications, conference presentations, grants or grant applications or
  - (e) an explanation why sanctions are inappropriate (e.g. de minimis research misconduct or sufficient other remedial actions have already been taken or will be taken).

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- (13) In making its recommendation regarding the resolution, the Investigation Committee should consider:
- (a) Whether the misconduct was an isolated event or part of a pattern of misconduct,
  - (b) Whether it had a significant impact on the research record, human or animal research subjects, other researchers, institutions, or the public welfare,
  - (c) Whether the Respondent accepted or refused to accept responsibility,
  - (d) Whether the Respondent retaliated against other involved individuals,
  - (e) Whether the Respondent is or could be ready to participate in future research as a responsible member of the research community,
  - (f) Whether measures or conditions, such as medical treatment for an illness or continuing to research under the supervision of a senior faculty member could be taken to restore the Respondent to the status of a responsible member of the research community and
  - (g) Any other relevant factors in mitigation or aggravation that, in the Investigation Committee's opinion would result in a just and fair resolution of the allegation of research misconduct.<sup>34</sup>

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- (15) The Respondent may, without conceding a finding of research misconduct submit evidence or arguments in mitigation of the proposed recommendation as part of the response to the draft investigation committee report.
- (16) The Investigating Committee may look to federal or state regulations, e.g., 42 CFR 93.408, 48 CFR 1252.355-70(f), or published determinations of research misconduct cases, e.g., <https://www.nsf.gov/oig/case-closeout/>, [https://ori.hhs.gov/content/case\\_summary](https://ori.hhs.gov/content/case_summary), or sources involving analogous conduct for guidance in making its recommendation.
- (17) If requested by the Investigation Committee, the RIO may, consistent with obligations of confidentiality, inform the investigation committee of the past recommendations at the University under similar circumstances.
- (18) The Investigation Committee should cite the sources, if any, that it relied upon in making its recommendation and explain the recommended sanction to the DO.

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- (v) The Investigation Committee will submit its draft and final report and comments to the RIO. The RIO will transmit the Investigation Committee report along with an independent recommendation to the DO with a copy to the Vice President for Research. Within 30 days after receiving the final report, the DO, after consultation with the RIO and Investigation Committee, will decide whether to accept the finding of misconduct and the investigation committee's recommendation as to possible administrative action. If the DO disagrees with the findings or recommendation of the investigation committee,
  - (1) the DO will explain in detail the basis for rejecting the findings or recommendation of the investigation committee (and provide the Investigation Committee a reasonable period to respond before making a final decision) or
  - (2) the DO may refer the report back to the Investigation

More opportunity for feedback to the committee and for the committee to address the DO's concerns.

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- (2) the DO may refer the report back to the Investigation

Committee with specific instructions for further fact-finding, a more detailed analysis, or to reconsider its recommendations.

- (3) The DO will notify the Respondent, the Vice-President for Research, the RIO, the appropriate dean and any other applicable University official of the final decision.
- (4) In consultation with the Vice-President for Research and appropriate University official(s), the RIO will then decide whether to notify external funding agencies, publishers, or co-authors and what information to include in the notification.

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## NEW ADMISSION OF RESEARCH MISCONDUCT

- (g) A finding of research misconduct based on the admission by the Respondent may be made by the Inquiry Panel or the Investigation Committee in consultation with the RIO and confirmed by the DO when:
- (i) The Respondent has been notified of the allegations of research misconduct.
  - (ii) The Inquiry Panel or Investigation Committee must find by the preponderance of the evidence that the Respondent has:
    - (1) Responded to the allegations and findings; or waived the opportunity

- (a) The admission of research misconduct is written, recorded, or transcribed.
- (b) The admission accepting responsibility must, in the Respondent's own words, contain explicit language that includes the definition of research misconduct such as "I knowingly intentionally, or recklessly falsified or fabricated results" or "I admit to research misconduct;"
- (c) The statement does not include language of mistake, inadvertence, excuse, justification, or innocent error. However, the Respondent may after the inquiry panel or investigation committee accepts the admission of responsibility then offer a statement or other relevant evidence as explanation or in mitigation.
- (d) Describes the alleged factual conduct that constitutes research misconduct.
- (e) There is sufficient independent evidence that supports the admission and

<p>(iii) The Respondent should not be given any advance incentive to accept responsibility. Further, any promises or statements made by the RIO, inquiry panel or investigation committee members, DO, or other institutional member regarding the report or recommendation or the DO's decision should be part of the record and explicitly stated in the report.</p> <p>(iv) The Respondent's offer to accept responsibility before the creation of an Investigation Committee constitutes the Respondent's consent for the Inquiry Panel to function as an Investigation Committee, and the Inquiry Panel shall submit an investigation committee report to the RIO and DO after the proceedings accepting responsibility.</p> <p>(v) The Inquiry Panel or Investigation Committee must satisfy itself that it has completed a thorough independent investigation and there is no additional credible evidence of other research misconduct by the Respondent. Further, the committee must refer any possible allegations or evidence of research misconduct by others to the RIO along with a recommendation whether the possible allegation or evidence warrant an inquiry or</p>	<p>(vi) The inquiry panel or investigation committee must explicitly determine the sources of research funding and make an explicit determination whether there was sponsor funding involved before recommending that the DO accept the proffered acceptance of responsibility.</p> <p>(vii) Terminating a research misconduct proceeding based on an acceptance of responsibility must also comply with the regulations or policies of the research sponsor.</p> <p>(viii) The RIO should before the acceptance of responsibility is accepted by the Inquiry Panel or Investigation Committee, inform the Respondent to seek independent advice as to the University and non-University effects of accepting responsibility for research misconduct, including those that might be imposed by the sponsor or others, if any, for example, on respondent's ability to seek additional research funding, serve on committees, participate in professional programs or opportunities, professional licenses, immigration status, etc.</p>
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## STATUTE OF LIMITATIONS

- (2) Exceptions to the Six-Year Limitation: Paragraph (a) of this section does not apply in the following instances:
- (a) Subsequent Use Exception: The Respondent continues or renews any incident of alleged research misconduct that occurred before the six-year limitation through the citation, republication, or other use for the potential benefit of the Respondent of the research record that is alleged to have been fabricated, falsified, or plagiarized.
  - (b) Health or safety of the public exception. If the RIO, following consultation with the sponsor or university officials responsible for the health and safety of the public or animal subjects, determines that the alleged misconduct, if it occurred, would possibly have a continued substantial adverse effect on the health or safety of the public or animal subjects, the statute of limitations may be waived.
  - (c) "Grandfather" exception. If University received the allegation of research misconduct before the effective date of this Policy.<sup>35</sup>

R 93.105

- (d) Plagiarism limitation. In the case of an allegation of research misconduct by plagiarism, if the alleged materials that were plagiarized still exist, the inquiry panel and investigation committees will determine as part of their reports whether the statute of limitations should be waived or in their discretion decline to consider the allegation as time-barred.

There is no existing statute of limitations. This is the same period as the federal policies. However, members of the RC suggested potentially no statute of limitation in plagiarism cases.





**THANK YOU FOR YOUR PATIENCE!**

