Research Misconduct & Compliance

Michelle Stalilonis
Senior Compliance Specialist
Office for Research Integrity
m-stalilonis@northwestern.edu
What is Research Misconduct?

- Fabrication
- Falsification
- Plagiarism

http://www.research.northwestern.edu/ori/misconduct/index.html
Research Misconduct

**Fabrication** is making up data or results and recording or reporting them.

**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.

**Plagiarism** is the appropriation of another person’s ideas, processes, results, or words without giving appropriate credit.
Reporting Research Misconduct

If you have concerns regarding potential research misconduct.

- Contact the Office for Research Integrity at nu-ori@northwestern.edu or 312.503.0054;
- Contact your supervisor, department chair or dean; or
- Contact Ethics Point. Northwestern University has contracted with EthicsPoint, a third party vendor, that will allow you to report concerns online or by dialing 866.294.3545.

Northwestern policy prohibits the taking of retaliatory action against anyone for reporting or inquiring about potential breaches of University policy or for seeking guidance on how to handle suspected breaches. The identity of confidential sources will be protected to the extent consistent with the needs of an inquiry or investigation. Those individuals who provide information in good faith about questionable conduct will be protected against reprisals.

Dealing with any compliance issue is difficult.

The University has resources to help you deal with challenging situations.

http://www.researchintegrity.northwestern.edu/research-misconduct/
To ask a question, receive guidance, or report a violation, contact a representative from the list below. All are trained and ready to help.

**Falsification of Research Effort**
Controller’s Office
Mike Daniels, Director
Call: 847-491-4710  Email: m-daniels2@northwestern.edu

**Grant Management**
Office of Sponsored Research
Lynda Wolter, Executive Director
Call: 312-503-7955  Email: lynda.wolter@northwestern.edu
Controller’s Office
Mike Daniels, Director
Call: 847-491-4710  Email: m-daniels2@northwestern.edu

**Research Misconduct**
Office for Research Integrity
Lauran Qualkenbush, Director
Call: 312-503-0054  Email: nu-ori@northwestern.edu

**Research on Animals**
Institutional Animal Care and Use Committee
Mandy Kozlowski, Director of IACUC
Call: 312-503-0109  Email: m-kozlowski@northwestern.edu

**Research on Human Subjects**
Institutional Review Board
Eileen Yates, MS, CIP, IRB Compliance Manager
Call: (312) 503-6011  Email: eyates@northwestern.edu
Compliance, Audit & Advisory Services

Compliance

The Compliance Office helps the university promote a culture of honest and ethical behavior as well as to identify and manage risk. The Office’s responsibilities include coordinating, encouraging and monitoring the operational compliance activities that occur throughout the University and advising senior administration and the Board of Trustees on the effectiveness of the University’s compliance efforts. The Compliance Office works with operational compliance owners to strategically build and improve their compliance programs and ensure they are responsive to evolving regulatory environments. The Compliance Office also manages the University’s EthicsPoint hotline and coordinates the University’s development and review of policies.
EthicsPoint: A Compliance Hotline

- Report potential misconduct or violations of policy:
  - (866)294-3545
  - www.northwestern.edu/ethics

- Any suspected problems will be reviewed according to University procedures

- Policy prohibits retaliatory action against those reporting

- Anonymous
Penalties for Non-compliance

Institutional:
- Fines and penalties
- Exceptional status
- Funding reduction

Personal:
- Termination
- Disciplinary action
- Criminal/civil sanctions
- Suspension and debarment
- Professional integrity compromised
## Recent Examples of the Impact of Noncompliance

<table>
<thead>
<tr>
<th>Institution</th>
<th>Settlement Time Frame</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northwestern University</td>
<td>February 2003</td>
<td>$5.5 million penalty for overstating effort reporting on federal sponsored projects</td>
</tr>
<tr>
<td>University of Connecticut</td>
<td>January 2006</td>
<td>$2.5 million penalty for overstating anticipated expenses, overcharging the government, and billing for items not covered by grants, Cost sharing issues</td>
</tr>
<tr>
<td>Cornell University’s Weill Medical College</td>
<td>Fall 2007</td>
<td>$2.6 million settlement for a PI failing to disclose on grant applications to the NIH the full extent of various active research projects</td>
</tr>
<tr>
<td>Yale University</td>
<td>December 2008</td>
<td>$7.6 million settlement for inadequate documentation of cost transfers and summer salary charges wrongly charged to federal grants</td>
</tr>
<tr>
<td>Dartmouth College</td>
<td>October 2010</td>
<td>$275,000 settlement and $604,000 in contract funds returned to the government for contract pricing and cost recovery issues, lack of compliance with Federal Acquisition Regulation (FAR), and Conflict of Interest issues.</td>
</tr>
</tbody>
</table>
Communicating Northwestern's values and expectations.

What is the role of University Policies?

Our University policies are meant to guide and enable our community members to uphold Northwestern's values and expectations.

DEVELOP A POLICY

Any Northwestern school, department, or unit may initiate a new policy.

- Policy Development Guidelines
- New Policy Proposal Template
- Standard Policy Template
- Guidelines for Reviewing Policies
- Policy Development Process Flowchart
- Policy Development FAQs

FIND A POLICY

University Policies on this site include existing policies (searchable by title); newly added policies (adopted within the past year); and policies under review (posted for comment from the Northwestern community).

- University Policies
- Newly Added Policies
- Policies Under Review
- School and Unit Policies
- Conduct

http://policies.northwestern.edu/
Research Data: Ownership, Retention and Access

- University Policy:
  http://research.northwestern.edu/sites/research/files/policies/Research_Data.pdf

- Defines “research data”
- Defines University and PI responsibilities
- Transfer to data when researcher leaves institution

- Data retained for minimum of 3 years after the last financial report for the project has been submitted unless longer periods are required
How can you ensure compliance?

- We are all responsible
- Understand complex regulations
- Identify resources
- Know when and where to ask for help
- When in doubt, ask
Questions?

WOW... DOES THIS HAPPEN OFTEN?