

# Supplemental Information for the U.S. Environmental Protection Agency's Scientific Integrity Policy January, 2017

This document provides supplemental information relevant to the U.S. Environmental Protection Agency's Scientific Integrity Policy, which was published in February 2012. (The Policy is at: [https://www.epa.gov/sites/production/files/2014-02/documents/scientific\\_integrity\\_policy\\_2012.pdf](https://www.epa.gov/sites/production/files/2014-02/documents/scientific_integrity_policy_2012.pdf))

Location	Previous	Correction
Page 3, line 11	Represent his/her own work fairly and accurately.	Represent his/her own work fairly and accurately <sup>4</sup> .  [footnote] <sup>4</sup> See “Best Practices for Designating Authorship” ( <a href="https://intranet.ord.epa.gov/p2/scientific-integrity/authorship-best-practices">https://intranet.ord.epa.gov/p2/scientific-integrity/authorship-best-practices</a> )
Page 4, line 4	From suppressing, altering, or otherwise impeding the timely release	From suppressing, altering, or otherwise impeding the timely <sup>5</sup> release  [footnote] <sup>5</sup> The Agency has defined timely at: <a href="https://intranet.ord.epa.gov/p2/sites/default/files/media/scientific_integrity_timeliness_policy.pdf">https://intranet.ord.epa.gov/p2/sites/default/files/media/scientific_integrity_timeliness_policy.pdf</a>
Page 4, line 5	release of scientific findings or conclusions.	release of scientific findings or conclusions. [insert bullet point] Encourages the use of the FOIA framework to promote accountability. If a response to a FOIA request related to scientific information is overdue, the requester may continue contacting the assigned lead office or the FOIA Public Liaison or he or she may also file a timeliness allegation with the Scientific Integrity Official.
Page 4, line 10	scientific misconduct does not include honest error or differences of opinion.	scientific misconduct does not include honest error or differences of opinion. Scientific misconduct is normally adjudicated by the Office of Inspector General <sup>6</sup> . The OIG has agreed to allow the Scientific Integrity Official to evaluate allegations of plagiarism (except in the circumstances listed in EPA Order 3120.5, Section 7), including making inquiries and writing reports summarizing the findings of those inquiries.  [footnote] <sup>6</sup> Coordination Procedures between the Scientific Integrity Official and the Office of

		<p>Inspector General can be found here:  <a href="https://intranet.ord.epa.gov/p2/sites/default/files/media/oig-scio_coordination_procedures_final.pdf">https://intranet.ord.epa.gov/p2/sites/default/files/media/oig-scio_coordination_procedures_final.pdf</a></p>
Page 5, line 25	All Agency employees should be familiar with those protections and avoid the appearance of retaliatory actions.	<p>All Agency employees should be familiar with these protections and avoid the appearance of retaliatory actions. In 2012, the U.S. Congress passed the Whistleblower Protection Enhancement Act amending the Whistleblower Protection Act of 1989 and strengthening protections for federal employees and applicants for federal employment.<sup>7</sup></p> <p>[insert bullet point] Notes that, in 2002, the U.S. Congress passed the Notification and Federal Employee Antidiscrimination and Retaliation Act (“No FEAR Act”) to promote a federal work environment that is free of discrimination and retaliation.<sup>6</sup></p> <p>[footnote] <sup>7</sup> Section 110 of the Act clarifies that whistleblower protections may be available for employees or applicants for employment who disclose information that they reasonably believe is evidence of censorship related to research, analysis, or technical information. The term “censorship related to research, analysis, or technical information” is defined to mean any effort to distort, misrepresent, or suppress research, analysis or technical information. Disclosures may be protected if the individual reasonably believes that the censorship is or will cause a violation of law, rule, or regulation; gross mismanagement, a gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety. <a href="https://www.gpo.gov/fdsys/pkg/PLAW-112publ199/pdf/PLAW-112publ199.pdf">https://www.gpo.gov/fdsys/pkg/PLAW-112publ199/pdf/PLAW-112publ199.pdf</a></p> <p><sup>8</sup> <a href="https://www.epa.gov/ocr/whistleblower-protections-epa-and-how-they-relate-non-disclosure-agreements-signed-epa-employees">https://www.epa.gov/ocr/whistleblower-protections-epa-and-how-they-relate-non-disclosure-agreements-signed-epa-employees</a></p>
Page 8, line 11	The EPA posts a Peer Review Agenda [18] for its ISIs and HISAs. In addition, the 2009 Addendum to the EPA’s Peer Review Handbook entitled: “Appearance of a Lack of Impartiality in External Peer Reviews” [19] provides additional clarity for the regulatory definition of “appearance of a lack of impartiality” for individuals who serve on peer review panels, criteria for applying this definition, and illustrative examples.	<p>The EPA posts a Peer Review Agenda [18] [or its ISIs and HISAs. In addition, the Peer Review Handbook provides clarity for the regulatory definition of “appearance of a lack of impartiality” [32] for individuals who serve on peer review panels, criteria for applying this definition, and illustrative examples.</p>

Page 9, line 29	<p>the conflict of interest requirements referenced above.</p> <p>D. Professional Development of Government Scientists</p>	<p>the conflict of interest requirements referenced above.</p> <p>For technical documents designated as Influential Scientific Information (ISI) or Highly Influential Scientific Assessment (HISA) where independent peer reviews will be conducted by an independent contractor under contract with EPA, the contractor and the EPA contracting officer will adhere to the Conflict of Interest Review Process for Contractor-Managed Peer Reviews.<sup>10</sup></p> <p>D. Professional Development of Government Scientists</p> <p>[footnote] <sup>10</sup> A description of the process can be found at: <a href="https://www.epa.gov/sites/production/files/2015-01/documents/epa-process-for-contractor_0.pdf">https://www.epa.gov/sites/production/files/2015-01/documents/epa-process-for-contractor_0.pdf</a></p>
Page 11, line 23	Develop a framework for Agency clearance procedures for scientific products as a guidance for Program Offices and Regional Offices.	<p>Develop a framework for Agency clearance procedures for scientific products as a guidance for Program Offices and Regional Offices. The EPA Scientific Integrity Committee will develop Agency-wide best practices for the approval of scientific products and communications. Each Program Office and Regional Office will use these to develop and document consistent, transparent, and predictable procedures for clearance, consistent with the Scientific Integrity Committee's best practices. The procedures will include guidance for clearance elements, time frames for clearance, and a process for redress if clearance procedures are not met.</p> <p>[the above was previously footnote <sup>4</sup> from page 6]</p>
Page 11, line 17	implementation and scientific misconduct issues within their respective Offices or Regions.	implementation and scientific misconduct issues within their respective Offices or Regions. The Agency will utilize its FMFIA Management Integrity Program to collect these certifications.
Works Cited		[32] U.S. Environmental Protection Agency (2015) Peer Review Handbook,

		Fourth Edition. p. 79. <a href="https://www.epa.gov/sites/production/files/2016-03/documents/epa_peer_review_handbook_4th_edition.pdf">https://www.epa.gov/sites/production/files/2016-03/documents/epa_peer_review_handbook_4th_edition.pdf</a>
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