

EPA ANNUAL SCIENTIFIC INTEGRITY 2016 NON-GOVERNMENTAL ORGANIZATIONS AND REGULATED INDUSTRY STAKEHOLDER MEETING

Chair: Dr. Francesca Grifo, Scientific Integrity Official

May 5, 2016
Meeting Summary

Welcome and Introduction

Dr. Francesca Grifo (the Scientific Integrity Official or SciO) opened the meeting and conducted the roll call. Participants included seven members of the Scientific Integrity Community, 10 EPA employees, fellows, and contractors, and 16 representatives from stakeholders, including: Society of Environmental Journalists, American Chemistry Council, CropLife America, ExxonMobil, Society of Professional Journalists, Union of Concerned Scientists, Environmental Defense Fund, Open Government Partnership, Monsanto Company, Olin Corporation, Public Employees for Environmental Responsibility, and FMC Corporation.

Dr. Grifo welcomed the participants to EPA's Annual Scientific Integrity Stakeholder Meeting. She introduced Dr. Thomas Burke, EPA Science Advisor.

Remarks from the Science Advisor

Dr. Burke welcomed the meeting participants and expounded on the importance of scientific integrity at EPA. Dr. Burke recognized the efforts of Dr. Grifo, who chairs the Scientific Integrity Committee and has led a cross-Agency training program on EPA's Scientific Integrity Policy to ensure that scientific integrity is engrained in EPA's culture.

Policies, Resources, Training, and Updates

Dr. Grifo provided an overview of the policies and resources related to scientific integrity that have been compiled on the EPA Scientific Integrity Intranet site. She spoke about the scientific integrity whiteboard video and PowerPoint training program that was initiated in March, and she showed the introductory whiteboard video to the participants.

In response to a question about how many people the training will reach, Dr. Grifo stated that an exact estimate has not been made but they could number in the thousands. Dr. Grifo noted that, as of February 2016, the Scientific Integrity Office received 97 allegations (37 active, 42 resolved, 11 with the status of being unable to proceed, and 7 reassigned). Dr. Grifo also discussed the development of authorship best practices. The best practices will include authorship criteria, common authorship abuses, and information about plagiarism and self-plagiarism. The scientific integrity survey was returned by 5,763 respondents. Many of the questions called for responses in essay format, which require a long time to analyze.

Dr. Grifo responded to questions about developing a Differing Scientific Opinions (DSO) Policy, indicating that the process will be as transparent as possible and enjoys full support from EPA's Office of Inspector General.

Stakeholder Concerns

In response to stakeholder concerns, Dr. Grifo made the following points about the DSO Policy:

- The DSO process will serve to help resolve disagreements that are not resolved under the Action Development Process.
- Protections for individuals who might suffer retaliation for expressing a DSO are under discussion with EPA's Office of General Counsel.
- The DSO Policy will be transparent about protections against retaliation or negative consequences for those with differing views.
- Written clarification regarding the applicability of the Whistleblower Protection Act of 1989 is being sought from the U.S. Office of Special Counsel.
- The Agency will consider providing an opportunity for public comment on the policy, but possible delays this might engender are a concern. A less formal external review is another option.

With regard to the Scientific Integrity Policy, Dr. Grifo made the following points in response to stakeholder questions:

- The Scientific Integrity Policy applies to Agency science (i.e., data and the conclusions drawn from data), not policy (i.e., what the science means or how it is used).
- Whether the policy applies to social and political science is an issue that Dr. Grifo will discuss with her staff.
- The policy addresses concerns about restrictions on media contact. If specific allegations are brought about restricted access to media, they will be investigated.
- The process of reporting an allegation of loss of scientific integrity can be started in multiple ways, including in writing, via email or by telephone to Dr. Grifo or one of the Deputy Scientific Integrity Officials, as well as anonymously via the OIG hotline. Many times the issue can be resolved through meetings of the concerned parties without invoking the allegation process.
- Each year, information about adjudicated allegations is published in redacted format in the annual report. All identifying details that might result in the identification of the involved parties are removed.
- Confidentiality agreements are being developed to encourage EPA staff to come forward with allegations.
- The policy applies to full-time employees, grantees and collaborators. Language is being developed that will require all grantees to certify that they have read and will abide by EPA's Scientific Integrity Policy. It will be implemented in a phased approach. Implementing the requirement for contractors will require a regulatory change.

Dr. Grifo provided the following responses about the Agency Framework for Clearance Procedures for Scientific Products:

- The Clearance Framework is separate from the DSO Policy.
- The Agency will consider providing an opportunity for public comment on the framework, but possible delays this might engender are a concern. A less formal external review is another option.

In response to a question, Dr. Grifo indicated that the Data Access Plan will be released soon but no specific release date has been established. The Office of Research and Development is in the forefront of transparency efforts at the Agency, but developing an Agency-wide plan has proved to be a challenging task.

A question was asked about the format in which survey results will be available. Dr. Grifo replied that aggregated responses will be provided. A presentation in PowerPoint will be prepared describing the results of the survey when the analysis is complete.

A participant asked whether certain parts of the Agency have higher rates of allegations than others. Dr. Grifo answered that the only patterns observed have been that larger parts of EPA have more allegations than smaller parts.

In response to a participant's question, Dr. Grifo described the training process. Trainings have taken place across the country in almost all of EPA's laboratories and offices. Dr. Grifo typically meets with senior managers, middle managers and all hands, as well as holds office hours. The trainings have succeeded in encouraging people to come forward with their scientific integrity concerns.