

Policy on Research Misconduct: Allegations, Investigations, and Reporting

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1. Purpose

This policy sets forth Stanford University's standards and procedural requirements for addressing allegations of research misconduct and constitutes Stanford's policies and procedures for purposes of 42 C.F.R. § 93.75. It defines the types of research conduct covered by this policy, establishes the standards and requirements applicable to research misconduct proceedings, and identifies the responsibilities of individuals and University offices involved in those proceedings.

This policy ensures that Stanford complies with applicable federal and non-federal requirements, including the U.S. Public Health Service Policies on Research Misconduct at 42 C.F.R. Part 93 (2024 Final Rule, effective January 1, 2026 for allegations received on or after that date), while providing a fair, consistent, and thorough framework for evaluating concerns related to the integrity of Stanford's research activities.¹

For allegations received before January 1, 2026, Stanford follows 42 C.F.R. Part 93 as published in the 2005 edition of the Code of Federal Regulations. Stanford may apply this policy to such allegations to the extent it does not conflict with 42 C.F.R. § 93.75.

Notwithstanding the foregoing, Stanford applies the definition of plagiarism set forth in 42 C.F.R. § 93.227 under the 2024 Final Rule (effective January 1, 2026) to all allegations regardless of when received, consistent with ORI's longstanding guidance that self-plagiarism and authorship disputes do not constitute research misconduct. See [ORI Policy on Plagiarism](#) (Dec. 1994) and the definition in section 4 below.

Stanford maintains an assurance with the U.S. Department of Health and Human Services (HHS), Office of Research Integrity (ORI) that it will comply with 42 C.F.R. Part 93. Stanford affirms that this policy and its implementing procedures govern the handling of allegations of research misconduct involving research supported by federal sponsors (e.g., PHS/NIH, NSF, DOE, DoD) and non-federal sponsors, and that Stanford is committed to cooperating with ORI and other relevant federal agencies.

This policy is publicly available, including to all members of the Stanford community in accordance with 42 C.F.R. § 93.302.

2. Introduction

Each member of the University community has a responsibility to foster an environment that promotes intellectual honesty and integrity, and which does not tolerate misconduct in any aspect of research or scholarly endeavor. All members of the Stanford community who conduct research are expected to do so with honesty, rigor, and transparency, and to contribute to an organizational culture that establishes, maintains, and promotes research integrity and the responsible conduct of research.

When it occurs, research misconduct is extremely troubling because it undermines the norms and values we attempt to instill in students, public trust in academic scholarship, and the financial support of the government and other sponsors for academic research. The importance of integrity to Stanford's research mission cannot be overemphasized.

¹ This policy is drafted primarily with reference to 42 C.F.R. Part 93. Requirements applicable to other federal agencies are addressed in Section 9. Parallel citations to non-PHS agency-specific regulations are not included throughout this document.

Stanford strives to reduce risks of research misconduct occurring; support all good-faith efforts to report suspected misconduct; promptly and thoroughly address allegations of research misconduct; and when necessary, rectify the scientific record and restore researchers' reputations.

3. Scope and Applicability

Stanford's definition of research misconduct and its standards for addressing allegations of misconduct conform to the requirements of applicable federal sponsors.

This policy applies to all stages of a research misconduct proceeding, and the scope of a proceeding may expand at any stage if additional allegations, issues, or evidence of potential research misconduct are identified.

3.1 Time Limitation

Six-Year Rule. Research misconduct must have occurred within six (6) years of the date Stanford or a federal agency received the allegation. Allegations older than six years will not ordinarily be considered, subject to the following exceptions: [42 C.F.R. § 93.104]

- **Subsequent Use Exception.** The six-year limitation does not apply if the respondent has used, republished, or cited the specific portion(s) of the research record alleged to have been fabricated, falsified, or plagiarized. [42 C.F.R. § 93.104(b)(1)]
- **Public Health and Safety Exception.** The six-year limitation also does not apply if ORI or Stanford, following consultation with ORI, determines that the alleged research misconduct, if it occurred, would possibly have a substantial adverse effect on the health or safety of the public. [42 C.F.R. § 93.104(b)(2)]

3.2 Personnel and Research Covered

Stanford's policy is applicable to:

- Research proposed, conducted, or reported at Stanford by Stanford University-related individuals (for example, those with an appointment or affiliation with Stanford University, including faculty, academic staff, students, postdoctoral scholars, visiting scholars who make significant use of university research resources, including participation in any sponsored project awarded to Stanford University), and those with any other Stanford University teaching and/or research titles such as adjunct or clinical.
- Research proposed, conducted, or reported elsewhere by such Stanford University-related individuals as part of their Stanford University-related duties or activities.
- At the discretion of the University, research proposed, conducted, or reported where such research is claimed, cited, or implied to have been done at Stanford, or where a Stanford appointment or official affiliation is claimed, cited, or implied in connection with the research.

3.3 Subawardees and Subcontractors

Where Stanford is a prime recipient of a federal award and has issued subawards or subcontracts, subawardees and subcontractors are responsible for addressing research misconduct in accordance with their own institutional policies and applicable regulatory requirements unless the subaward or subcontract expressly requires otherwise.

Where Stanford is a subawardee under a prime award to another institution, Stanford will comply with research misconduct requirements flowed down through the subaward (in addition to its own policies), and will cooperate with the prime recipient's research misconduct proceedings as required by the award.

4. Definitions

For purposes of this policy, the following definitions apply. Definitions marked with a regulatory citation conform to 42 C.F.R. Part 93 (2024 Final Rule, effective January 1, 2026), unless otherwise specified, and definitions used by other applicable federal research sponsors, including NSF, DOE, and DoD, are generally consistent with these definitions. This list is not exhaustive; additional definitions are set forth in 42 C.F.R. Part 93, Subpart B.

4.1 Accepted Practices of the Relevant Research Community

Practices established by 42 C.F.R. Part 93 and by PHS funding components, as well as commonly accepted professional codes or norms within the overarching community of researchers and institutions that apply for and receive PHS awards. [42 C.F.R. § 93.200]

4.2 Administrative Record

Comprises the institutional record; any information provided by the respondent to ORI or other applicable government agencies; any additional information provided to ORI or other applicable government agencies while the case is pending; and any analysis or additional information generated or obtained by ORI or other applicable government agencies. Any analysis or additional information generated or obtained by ORI or other applicable government agencies will also be made available to the respondent. [42 C.F.R. § 93.202]

4.3 Allegation

A disclosure of possible research misconduct through any means of communication brought directly to the attention of an institutional or HHS official. [42 C.F.R. § 93.203]

4.4 Assessment

A consideration of whether an allegation of research misconduct appears to fall within the definition of research misconduct and is sufficiently credible and specific so that potential evidence of research misconduct may be identified. The assessment involves only the review of readily accessible information relevant to the allegation. [42 C.F.R. § 93.204]

4.5 Complainant

A person who in good faith makes an allegation of research misconduct. [42 C.F.R. § 93.206]

4.6 Evidence

Anything offered or obtained during a research misconduct proceeding that tends to prove or disprove the existence of an alleged fact. Evidence includes documents (hard copy or electronic), information, tangible items, and testimony. [42 C.F.R. § 93.210]

4.7 Fabrication

Making up data or results and recording or reporting them. [42 C.F.R. § 93.211]

4.8 Falsification

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. [42 C.F.R. § 93.212]

4.9 Good Faith

As applied to a complainant or witness, having a reasonable belief in the truth of one's allegation or testimony, based on the information known at the time. An allegation is not in good faith if made with knowledge of, or reckless disregard for, information that would negate the allegation. As applied to an institutional or committee member, cooperating with the proceeding by impartially carrying out assigned duties, whereas lack of good faith includes acts or omissions that are dishonest or influenced by conflicts of interest. [42 C.F.R. § 93.214]

4.10 Inquiry

Preliminary information-gathering and preliminary fact-finding to determine whether an allegation warrants a formal investigation. An inquiry does not require a full review of all related evidence. [42 C.F.R. § 93.215]

4.11 Institutional Deciding Official

The Institutional Deciding Official (IDO) makes final determinations regarding allegations of research misconduct and any institutional actions. At Stanford, the IDO is the Vice Provost and Dean of Research (VPDoR). [42 C.F.R. § 93.218]

4.12 Institutional Certifying Official

The Institutional Certifying Official (ICO) is responsible for assuring on behalf of an institution that the institution has written policies and procedures for addressing allegations of research misconduct, in compliance with this part. The ICO is also responsible for certifying the content of the institution's annual report, which contains information specified by ORI on the institution's compliance with this part, and ensuring the report is submitted to ORI, as required. At Stanford, the University Research Integrity Officer (RIO) serves as the ICO. The same individual cannot serve as both the ICO and the IDO. [42 C.F.R. § 93.217]

4.13 School Dean or Designated Institutional Leader

A School Dean or Designated Institutional Leader (SDDIL) is an individual who bears primary operational responsibility and accountability for research misconduct matters within their school, laboratory, institute, center, or other academic unit. A SDDIL may delegate specific functions within their unit or to the University RIO but retains accountability for compliance with this policy regardless of how functions are delegated.

4.14 Institutional Record

The records compiled or generated during the research misconduct proceeding (except records not considered or relied on), including documentation of the assessment, inquiry report, investigation report, IDO's written decision, records of any institutional appeal, and a single index of all research records and evidence. [42 C.F.R. § 93.220]

4.15 Intentionally

To act with the aim of carrying out the act. [42 C.F.R. § 93.221]

4.16 Investigation

The formal development of a factual record and the examination of that record to develop findings and recommendations for a final determination by the Institutional Deciding Official. [42 C.F.R. § 93.222]

4.17 Knowingly

To act with awareness of the act. [42 C.F.R. § 93.223]

4.18 PHS Support

PHS funding, or applications or proposals for PHS funding, for biomedical or behavioral research, research training, or activities related to that research or training. [42 C.F.R. § 93.230]

4.19 Plagiarism

The appropriation of another person's ideas, processes, results, or words without giving appropriate credit. Plagiarism includes the unattributed verbatim or nearly verbatim copying of sentences and paragraphs from another's work that materially misleads the reader regarding the contributions of the author. Plagiarism does not include authorship or credit disputes, self-plagiarism, or the limited use of identical or nearly identical phrases that describe a commonly used methodology. [42 C.F.R. § 93.227 (effective January 1, 2026)]

(Note: The 2024 Final Rule codified into regulation what had previously been the Office of Research Integrity's longstanding guidance, that plagiarism does not include self-plagiarism or authorship and credit disputes. See ORI, Policy on Plagiarism (Dec. 1994), available at <https://ori.hhs.gov/ori-policy-plagiarism>. Stanford applies this definition to all allegations regardless of when received.

4.20 Preponderance of the Evidence

Proof by evidence that, compared with evidence opposing it, leads to the conclusion that the fact at issue is more likely true than not. [42 C.F.R. § 93.228]

4.21 Recklessly

To propose, perform, or review research, or report research results, with indifference to a known risk of fabrication, falsification, or plagiarism. [42 C.F.R. § 93.231]

4.22 Research Integrity Officer (RIO)

The institutional official responsible for administering Stanford's written policies and procedures for addressing allegations of research misconduct in compliance with 42 C.F.R. Part 93. [42 C.F.R. § 93.233]

4.23 Research Misconduct

Fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results. Research misconduct does not include honest error or differences of opinion. [42 C.F.R. § 93.234]

A finding of research misconduct requires that: (1) there be a significant departure from accepted practices of the relevant research community; (2) the misconduct be committed intentionally, knowingly, or recklessly; and (3) the allegation be proven by a preponderance of the evidence. [42 C.F.R. § 93.103]

Stanford University's disciplinary procedures may establish a different standard of proof for disciplinary actions.

4.24 Research Record

The record of data or results that embody the facts resulting from scientific inquiry. Examples include research proposals, raw data, processed data, clinical research records, laboratory records, laboratory notebooks, progress reports, manuscripts, abstracts, theses, records of oral presentations, online content, and journal articles. [42 C.F.R. § 93.236]

4.25 Respondent

The person against whom an allegation of research misconduct is directed, or who is the subject of a misconduct proceeding. [42 C.F.R. § 93.237]

4.26 Retaliation

An adverse action taken against a complainant, witness, or committee member by an institution or one of its members in response to a good faith allegation of research misconduct or good faith cooperation with a research misconduct proceeding. Stanford strictly prohibits retaliation. [42 C.F.R. § 93.238]

5. Research Misconduct: Exclusions and Finding Standard

This policy governs only allegations of research misconduct as defined in Section 4. Other forms of questionable research practice that do not meet this definition, such as reckless disregard for accuracy, failure to supervise adequately, or other lapses from professional conduct or neglect of academic duties are not covered by this policy but may be addressed through other applicable [Stanford policies](#). Similarly, research involving authorship or collaboration disputes are outside the scope of this policy except to the extent that they constitute plagiarism as defined in Section 4 above.

Allegations, suspicions, or findings of misconduct outside the scope of this policy should be referred for investigation to the cognizant dean, vice provost, or vice president; the process of investigation and reporting obligations may differ from those required for research misconduct cases.

Because this policy is designed primarily to protect the integrity of the public research record, instances of alleged research misconduct by students in practicum-type courses, and in coursework and classroom activities, may in many cases be better addressed through [The Honor Code](#) or [The Fundamental Standard](#) procedures administered by the Stanford Office of Community Standards rather than through this policy.

6. Roles and Responsibilities

Stanford University includes seven schools and a number of independent laboratories, centers, and institutes, each with significant autonomy in administering research activities. This policy respects that autonomy while establishing minimum University-wide standards and clear lines of accountability. SDDILs bear primary operational responsibility for research misconduct matters within their academic units, serve as the primary officials for receiving allegations, and operate under the oversight of the University RIO. Additional responsibilities and arrangements applicable to independent laboratories, institutes, and centers, including SLAC National Accelerator Laboratory, are set forth in Sections 6.4 and 16.5 of this policy.

6.1 Provost

The University Provost is the policy authority for research misconduct at Stanford. While the day-to-day administration of this policy is delegated to the VPDoR, the University RIO, and SDDILs, the Provost retains authority to issue this policy under University authority, decide whether and when to disclose information about research misconduct proceedings to external parties other than sponsors, and receive reports from the VPDoR on matters of institutional significance.

6.2 Vice Provost and Dean of Research

The Vice Provost and Dean of Research (VPDoR) serves as Stanford's Institutional Official (IO) for research and, for purposes of 42 C.F.R. Part 93, as Stanford's Institutional Deciding Official (IDO). The VPDoR makes the University's final determination in research

misconduct proceedings. The same individual cannot serve as both the IDO and the RIO. [42 C.F.R. § 93.218] For academic units whose cognizant dean is the VPDoR, the Provost will designate an individual to perform the SDDIL functions under this policy, in order to preserve the IDO's independence.

Responsibilities include:

1. Ensuring Stanford complies with federal and sponsor requirements under 42 C.F.R. Part 93 and other applicable regulations;
2. Designating an associate dean, deputy director, department chair, or other individual to perform the responsibilities of a SDDIL who has an actual or perceived conflict of interest in a particular matter;
3. Receiving final investigation reports and making a final written determination of whether research misconduct occurred, who committed it, and what institutional actions are taken or to be taken;
4. Imposing or authorizing sanctions when warranted, in coordination with the faculty disciplinary process and other applicable procedures;
5. Making or overseeing all required notifications and reports to ORI, sponsors, and other authorities;
6. Appointing and overseeing the University RIO;
7. Approving requests for extensions of the investigation period;
8. Receiving and acting on reports from SDDILs of emergency or special circumstances;
9. Coordinating with the Provost on matters of institutional significance or public disclosure.

6.3 University Research Integrity Officer

The University Research Integrity Officer (University RIO) sits within the Office of the Vice Provost and Dean of Research and is appointed by and reports to the VPDoR, or the VPDoR's designee. The University RIO has oversight authority for Stanford's research misconduct policy and provides guidance and support to SDDILs who bear operational responsibility for research misconduct proceedings within their academic units unless otherwise delegated to the University RIO. The University RIO also serves as Stanford's Institutional Certifying Official (ICO). The same individual cannot serve as both the ICO and the IDO.

Responsibilities include:

1. Consulting confidentially with persons uncertain about whether to submit an allegation of research misconduct, including on an anonymous or hypothetical basis;
2. Receiving allegations made directly to the University RIO and referring them to the relevant school dean or designated institutional leader, unless the nature of the allegation or the circumstances make central handling by the University RIO more appropriate;
3. Overseeing and advising SDDILs on assessment, inquiry, and investigation procedures throughout the proceeding;
4. Ensuring proper sequestration of, and maintaining custody of or full access to, all research records and evidence pertinent to the proceeding, including originals or substantially equivalent copies, whether received by transfer, shared secure repository, or other means. (The University RIO maintains oversight of all sequestration and custody arrangements, regardless of which unit retains physical custody of the records); [42 C.F.R. §§ 93.307(d), 93.310(d)]
5. Overseeing the appointment of investigation committees;

6. Ensuring confidentiality and protection of complainants, respondents, and witnesses, and research subjects, and limiting disclosure of their identities to those who need to know;
7. Ensuring all required notifications to ORI and sponsors are made within applicable time frames;
8. Advising the VPDoR on findings and recommended institutional actions;
9. Maintaining the complete institutional research misconduct record and all sequestered evidence, as defined in 42 C.F.R. § 93.220, for the period required under 42 C.F.R. § 93.318;
10. Coordinating transmittal of the institutional record to ORI following a final determination by the VPDoR and ensuring completeness and accuracy of the institutional record transmitted following a final determination; [42 C.F.R. § 93.316]
11. Certifying the annual compliance report to ORI; [42 C.F.R. § 93.217]
12. Ensuring compliance with award-specific notification requirements, in coordination with applicable research administration offices and SDDILs.

6.4 School Dean and Designated Institutional Leader

School Deans and Designated Institutional Leaders (SDDILs) serve as the primary officials for receiving allegations of research misconduct within their academic unit and have primary operational responsibility for research misconduct matters and proceedings, including conducting or overseeing assessments, inquiries, and investigations, unless specific functions are delegated to the University RIO. They operate with substantial autonomy within the framework established by this policy and under the oversight of the University RIO. Each academic unit should designate a standing point of contact for research integrity matters who will work with the University RIO on a routine basis.

If a SDDIL has an actual or perceived conflict of interest in a particular matter, they will disclose it to the University RIO or the VPDoR promptly upon becoming aware of it. If there is an actual conflict or a perceived conflict that would undermine the integrity of the research misconduct process, the VPDoR will designate another individual to perform these functions.

For academic units whose cognizant dean is the VPDoR, the Provost will designate another individual to perform these functions in order to preserve the IDO's independence.

Responsibilities include:

1. Receiving allegations of research misconduct through any means of communication;
2. Conducting or overseeing the Assessment to determine whether the allegation falls within the definition of research misconduct, involves PHS-supported or other applicable research within the scope of this policy, and is sufficiently credible and specific so that potential evidence of research misconduct may be identified; [42 C.F.R. § 93.306]
3. Promptly notifying the University RIO of any allegations received, including those allegations that do not proceed to inquiry, and coordinating with the RIO throughout the process;
4. Conducting or overseeing the Inquiry, including convening any inquiry committee and preparing the inquiry report under the oversight or with the assistance of the University RIO; [42 C.F.R. § 93.307]
5. Identifying, collecting, and securing all research records and evidence within their academic unit relevant to the proceeding at each stage, including assessment, inquiry, investigation, and any appeal, and ensuring the University RIO has full and prompt access to all such records, whether through transfer, shared secure repository, or other means approved by the RIO; [42 C.F.R. §§ 93.307(d), 93.310(d), 93.318]

6. Identifying all outside funding sources for the research that is the subject of the proceeding and coordinating with the University RIO on applicable sponsor notification requirements;
7. Completing the final inquiry report, with recommendation as to whether an investigation is warranted, within 90 days of initiation of the inquiry, unless the inquiry takes longer than 90 days to complete, in which case the inquiry report will document the reasons for exceeding the 90-day period; [42 C.F.R. § 93.307(h)]
8. If an investigation is warranted, conducting or overseeing the Investigation, including convening the investigation committee unless these functions are specifically delegated to the RIO, and ensuring the investigation report is prepared in accordance with applicable requirements; [42 C.F.R. §§ 93.310–93.313]
9. Taking interim administrative actions when necessary to protect research subjects, animals, funds, or the research record, in consultation with the VPDoR or University RIO (or independently in emergencies), and documenting and reporting such actions to the VPDoR;
10. Reporting to the VPDoR and the University RIO immediately any emergency, special circumstance, or potential regulatory violation identified during a proceeding, to enable the institution to notify ORI as required; [42 C.F.R. § 93.305(g)]
11. Ensuring that applicable responsible conduct of research (RCR) training requirements are communicated and completed within their academic unit, consistent with federal requirements and the institution's obligation to foster a research environment that promotes research integrity and the responsible conduct of research. [42 C.F.R. § 93.300(c)]

6.5 Complainants

Complainants are expected to make allegations in good faith, provide relevant information and evidence to the extent possible, and cooperate with the research misconduct process. Stanford prohibits retaliation of any kind against any person who, acting in good faith, reports or provides information about suspected or alleged research misconduct. [42 C.F.R. § 93.238] Complainants who believe they have experienced retaliation should report it promptly through available University reporting channels such as the [University Compliance Helpline](#), the University RIO or the VPDoR.

6.6 Respondents

Respondents are entitled to a fair, impartial, and appropriately confidential process. They must receive timely written notice of the allegations, access to the evidence considered or relied upon, and an opportunity to respond. Respondents are required to cooperate with proceedings, including providing information, research records, and other evidence. Respondents have the right to respond to the findings of any inquiry or investigation report and, where a finding of research misconduct is made, comment on the report, and to request any institutional appeal process.

Respondents are required to preserve research records and provide them upon request. Failure to comply with evidentiary obligations may have consequences under federal regulation. The respondent's destruction of research records documenting the questioned research may be used as evidence of research misconduct where a preponderance of the evidence establishes that the respondent intentionally or knowingly destroyed records after being informed of the allegations. [42 C.F.R. § 93.105(b)(1)] Additionally, the respondent's failure to provide research records may be used as evidence of misconduct where the respondent claims to possess the records but refuses to provide them upon request. [42 C.F.R. § 93.105(b)(1)]

6.7 Stanford Community

All members of the Stanford community share responsibility for fostering a culture of research integrity. Any member who suspects misconduct should report it to their school dean or designated institutional leader, the University RIO, the VPDoR, or through University reporting mechanisms such as the [University Compliance Helpline](#).

6.8 Committee Members

Committee members are experts who act in good faith to cooperate with research misconduct proceedings by impartially carrying out their assigned duties. Committee members must have relevant expertise and be free of real or perceived conflicts of interest with any of the involved parties. [42 C.F.R. § 93.305(f)(1)]

A single qualified individual or a committee may conduct inquiry proceedings. Investigation committees typically consist of three or more members. Where the respondent is a faculty member, at least one committee member should generally be a faculty member. Committee members are expected to maintain confidentiality throughout and after the proceeding.

6.9 Witnesses

Witnesses are individuals whom Stanford has identified as reasonably having information regarding relevant aspects of a research misconduct proceeding. Witnesses are expected to cooperate with research misconduct proceedings in good faith. Testimony is considered in good faith when the witness has a reasonable belief in its truth based on the information known to them at the time. Witnesses are protected from retaliation for good-faith participation in a proceeding. [42 C.F.R. § 93.238]

7. Individual Reporting Responsibility of Allegations

Any individual who believes an act of research misconduct has occurred or is occurring should notify the University RIO or the SDDIL of the appropriate school, institute, or center through any means of communication (written, oral, or other). An individual who is unsure whether an incident falls within the definition of research misconduct may confidentially and informally consult with the University RIO or other appropriate officials and may discuss the matter anonymously and/or hypothetically.

If the circumstances described are problematic but do not meet the definition of research misconduct, the University RIO or SDDIL, as appropriate, will refer the individual or allegation to other offices or officials with responsibility for resolving the problem. An allegation may also be made directly to ORI or another federal agency, and Stanford will cooperate fully with any such federal inquiry or investigation involving Stanford-affiliated research.

Reporting such concerns in good faith is a service to the University and to the larger academic community and will not jeopardize anyone's employment. Stanford University prohibits retaliation of any kind against a person who, acting in good faith, reports or provides information about suspected or alleged misconduct. [42 C.F.R. § 93.238]

8. Research Misconduct Proceedings: Assessment, Inquiry, and Investigation

The SDDIL conducts or oversees the Assessment, Inquiry, and, if warranted, Investigation, under the oversight of the University RIO. Specific functions may also be delegated to the University RIO consistent with Section 6.4.

These proceedings will be carried out in a manner that is thorough, competent, objective, fair, and appropriately protective of the confidentiality and reputations of all participants. Such assessments,

inquiries, and investigations should be coordinated with the University RIO to assure conformance with applicable regulations and award requirements.

At any stage of a research misconduct proceeding, Stanford may engage a committee, an expert outside of Stanford, or other persons to assist with or conduct proceedings on Stanford's behalf. Any committee, consortium, or person acting on Stanford's behalf will conduct proceedings in compliance with this policy and applicable federal requirements. [42 C.F.R. § 93.305(f)(1)] Stanford retains full institutional responsibility for ensuring compliance with this policy and applicable federal requirements regardless of any outside assistance retained. [42 C.F.R. § 93.305(f)(2)]

8.1 Assessment

The purpose of the assessment is to conduct a limited, preliminary review of readily available information to determine whether an allegation warrants an inquiry. The assessment does not involve a full review of the evidence and does not require interviewing witnesses or collecting research records. [42 C.F.R. § 93.306]

Upon receiving an allegation, the University RIO, the SDDIL, or designee will promptly assess whether the allegation: (a) falls within the definition of research misconduct; (b) involves research within the scope of this policy; and (c) is sufficiently credible and specific so that potential evidence of research misconduct may be identified. [42 C.F.R. §§ 93.204, 93.306(b)] The assessment involves only a review of readily accessible information, and the respondent need not be notified during the assessment unless circumstances require it.

If the allegation meets all three criteria, the assessment will be documented, all research records and other evidence promptly sequestered consistent with § 93.305(a), and the inquiry promptly initiated. Where the assessment was conducted by the SDDIL or designee, the University RIO should be notified. [42 C.F.R. § 93.306(b)]

If the allegation does not meet all three criteria, the assessment will be documented in sufficient detail to permit a later review by the University or applicable third parties such as ORI of the reasons why an inquiry was not conducted. Such documentation will be retained in accordance with 42 C.F.R. § 93.318. Where the assessment was conducted by the SDDIL or designee, the University RIO should be notified that the allegation did not proceed to inquiry. [42 C.F.R. § 93.306(c)(3)]

As part of the assessment, or as soon as practicable upon receiving an allegation, the SDDIL should identify any outside funding source(s) for the research that is the subject of the allegation and promptly notify the University RIO. The University RIO, in coordination with the relevant SDDIL and research administration offices, should determine whether any award-specific notification obligations require immediate action, including under any applicable sponsor policies or contract terms.

8.2 Inquiry

The purpose of the inquiry is to conduct an initial review of the evidence to determine whether an allegation warrants a formal investigation. An inquiry does not require a full review of all evidence related to the allegation. [42 C.F.R. § 93.307(b)]

Upon initiating the inquiry, the SDDIL will conduct the inquiry consistent with 42 C.F.R. § 93.307, including the following:

1. The SDDIL should confirm the funding source(s) at the outset of the inquiry and promptly notify the University RIO.

2. The SDDIL or designee as appropriate, will promptly take all reasonable and practical steps to identify, collect, and secure all research records and evidence needed to conduct the proceeding. The University RIO will be notified promptly and provided access to all such records. Records will be inventoried and sequestered in a manner consistent with § 93.305(a). Sequestration will continue whenever new relevant records become known during the inquiry, including where the scope of the inquiry expands to encompass additional allegations or respondents. [42 C.F.R. § 93.307(d)]
3. At the time of, or before the beginning of, an inquiry, the institution will make a good faith effort to notify the respondent of the allegations specific to that respondent. If the inquiry subsequently identifies additional respondents, they will also be notified in writing. If additional allegations are raised during the inquiry, the respondent(s) will be notified in writing of those additional allegations. Where an inquiry involves multiple respondents, the inquiry may be conducted as a single proceeding, with each respondent notified only of the allegations specific to that respondent. The inquiry report will address each respondent's alleged conduct separately to the extent necessary to determine whether an investigation is warranted as to each. [42 C.F.R. § 93.307(c)]
4. Institutions may convene a committee of one or more experts to conduct the inquiry review, or the inquiry may be conducted by the RIO or another designated institutional official with the assistance of one or more subject matter experts as needed.
5. Where the allegation involves research conducted at multiple institutions, the inquiry will be conducted consistent with the joint proceeding requirements of this policy. [42 C.F.R. §§ 93.307(e)(1)–(2), 93.305(e)] See Section 16.1.
6. Other relevant individuals, including witnesses or respondents, may be interviewed to provide additional information for the institution's review. [42 C.F.R. § 93.307(e)(3)]
7. The inquiry will be completed within 90 days of its initiation unless circumstances warrant a longer period. If the inquiry takes longer than 90 days to complete, the inquiry report will document the reasons for exceeding the 90-day period. [42 C.F.R. § 93.307(h)]
8. An investigation is warranted if: (i) there is a reasonable basis for concluding that the allegation falls within the definition of research misconduct under this policy; and (ii) preliminary information-gathering and fact-finding from the inquiry indicates that the allegation may have substance. Absent an admission by the respondent, findings of research misconduct, including any determination of whether the alleged misconduct was intentional, knowing, or reckless, cannot be made at the inquiry stage. [42 C.F.R. § 93.307(f), 93.117] However, if the inquiry finds credible evidence that the respondent's actions constitute honest error or a difference of opinion rather than research misconduct, the institution may close the proceeding at the inquiry stage. Any such evidence must be noted in the inquiry report. [42 C.F.R. § 93.307(g)(2)]
9. The institution will prepare a written inquiry report meeting the requirements of this section and applicable federal requirements. The respondent will be provided an opportunity to review and comment on the draft inquiry report; any comments received will be attached to the report. If there is potential evidence of honest error or difference of opinion, this will be noted in the report. [42 C.F.R. § 93.307(g); see also [ORI Sample Policies and Procedures for Addressing Allegations of Research Misconduct](#)]. The

required contents of the inquiry report, including the elements required for ORI reporting, are set forth in the Procedures. [42 C.F.R. § 93.309(a)]

10. Following completion of the inquiry, the respondent will be notified in writing whether the inquiry found that an investigation is warranted. The notice will include a copy of the inquiry report and either a copy of or reference to 42 C.F.R. Part 93 and Stanford's research misconduct policies and procedures. [42 C.F.R. § 93.308(a)] The institution is not required to notify the complainant of the inquiry results. However, Stanford may provide relevant portions of the inquiry report to the complainant for comment. If Stanford provides such notice to one complainant in a case, it will provide notice to all complainants in the case to the extent possible. [42 C.F.R. § 93.308(b)]
11. Where the inquiry concludes that an investigation is not warranted, detailed documentation will be maintained to permit a later review by the University and applicable third parties such as ORI of the reasons for that determination. Such documentation will describe the information reviewed, summarize any interviews conducted, state the conclusions reached, and indicate the basis for the determination that an investigation was not warranted. Such documentation will be retained in accordance with § 93.318. [42 C.F.R. § 93.309(c)] Unless the VPDoR has further concerns, a recommendation that an investigation is not warranted will be final. The final report of the inquiry and a copy of the documentation shall be maintained as part of the institutional record in accordance with Section 15 of this policy.
12. If the inquiry determines that an investigation is warranted, Stanford may have reporting obligations to sponsors. For example, for PHS-sponsored research, Stanford will provide ORI with a copy of the inquiry report within 30 days of that determination. [42 C.F.R. § 93.309(a)] Stanford will also provide ORI upon request with the institutional policies and procedures under which the inquiry was conducted and all research records and other evidence reviewed. [42 C.F.R. § 93.309(b)] At any time during the inquiry, Stanford will notify ORI of any special circumstances that may exist. [42 C.F.R. §§ 93.309(d), 93.305(g)] All such notifications are coordinated by the VPDoR and the University RIO consistent with Sections 9 and 10 of this policy.

8.3 Investigation

The purpose of the investigation is to determine whether there is a finding of research misconduct for each allegation.

If the inquiry leads to the conclusion that an investigation is warranted, the SDDIL (or designee), will conduct the investigation unless the investigation has been delegated to the University RIO. The investigation will address the following consistent with 42 C.F.R. § 93.310:

1. Within 30 days of determining that an investigation is warranted, Stanford will notify ORI of the decision to investigate and begin the investigation. [42 C.F.R. § 93.310(a)–(b)]
2. Before the investigation begins, the respondent will be notified in writing of the allegation(s) to be investigated, including any allegations not addressed during the inquiry.
3. If additional respondents are identified during the investigation, they will be notified of the allegation(s) and provided an opportunity to respond. If additional allegations

are raised during the investigation, the respondent(s) will be notified in writing. [42 C.F.R. § 93.310(c)] Prior to notifying any new respondents, the SDDIL or designee as appropriate, will take all reasonable steps to identify and secure any research records and evidence not previously sequestered. Records will be inventoried and sequestered consistent with § 93.305(a). Sequestration will continue whenever new relevant records become known during the investigation, for example, in response to new allegations. [42 C.F.R. § 93.310(d)]

4. Reasonable steps will be taken to ensure an impartial and unbiased investigation, including participation of persons with appropriate scientific expertise who do not have unresolved personal, professional, or financial conflicts of interest relevant to the investigation. [42 C.F.R. § 93.310(f)]
5. During the investigation, each respondent, complainant, and any other available person who has been reasonably identified as having relevant information, including witnesses identified by the respondent, will be interviewed. Interviews will be recorded and transcribed. Any exhibits shown to the interviewee will be numbered and referred to by that number in the interview. Transcripts will be made available to the interviewee for correction, and the transcript with any corrections and numbered exhibits will be included in the institutional record. The respondent will not be present during witness interviews but will be provided a transcript of each witness interview. [42 C.F.R. § 93.310(g)]
6. Where the allegation involves multiple respondents, the institution may but is not required to conduct a separate inquiry for each additional respondent identified during the investigation. Additional respondents will be notified of the allegation(s) and provided an opportunity to respond. The respondent will also be notified in writing of any allegation(s) not addressed during the inquiry within a reasonable time of the decision to pursue such allegation(s). Separate investigation reports and research misconduct determinations are required for each respondent. [42 C.F.R. § 93.310(c)(1)–(3)]
7. Where the allegation involves research conducted at multiple institutions, the investigation will be conducted consistent with the joint proceeding requirements of this policy. [42 C.F.R. § 93.310(i)] See Section 16.1.
8. All significant issues and leads discovered that are relevant to the investigation will be pursued diligently, including any evidence of additional instances of possible research misconduct. [42 C.F.R. § 93.310(j)]
9. The formal investigation will be completed within 180 days of its commencement, including preparing the draft investigation report, providing the respondents with an opportunity to comment, and transmitting the institutional record to ORI. [42 C.F.R. § 93.311(a)] If the investigation cannot be completed within 180 days, Stanford will request an extension from ORI in writing, providing the reasons for the delay and an estimated completion date. If an extension is granted, ORI may direct Stanford to file periodic progress reports. If the investigation exceeds 180 days, the investigation report will document the reasons. [42 C.F.R. § 93.311(b)–(d)]
10. The respondent will be given a copy of the draft investigation report and, concurrently, a copy of or supervised access to the research records and other evidence the investigation committee considered or relied on. The respondent will

submit any comments within 30 days of receiving the draft report. Stanford may provide the complainant a copy of the draft report or relevant portions; if so, complainant comments will be submitted within 30 days of receipt. Any comments received from the respondent or complainant will be appended to the final report. [42 C.F.R. § 93.312]

11. The final written investigation report will be prepared for each respondent and meet the requirements of applicable federal regulations. The required contents of the investigation report are set forth in the Procedures. [42 C.F.R. § 93.313]
12. If either the SDDIL or the VPDoR considers that sanctions may be warranted, the VPDoR will refer the final report to the appropriate University official for determination of discipline as appropriate (See Section 13.) If any sanctions result, the VPDoR will be informed and will append that information to the final report.

8.4 VPDoR (as IDO) Final Determination

The VPDoR will review the investigation report and make a final written determination of whether research misconduct occurred and, if so, who committed the misconduct, and include a description of relevant institutional actions taken or to be taken. [42 C.F.R. §§ 93.314(a)–(b)] After the VPDoR has made a final determination, and any institutional appeal is complete, Stanford will transmit the institutional record to ORI. [42 C.F.R. § 93.316] The VPDoR written determination will be provided to the respondent, and the date of receipt begins the period for an appeal under Section 8.5.

8.5 Institutional Appeal

Respondents may request an appeal of a finding of research misconduct or of institutional actions taken as a result of such a finding. The appeal will be limited to identifying any material errors of fact or significant procedural deficiency in the proceedings. The appeal authority will be an individual or body not involved in the investigation or the VPDoR's determination. The appeal must be submitted in writing within 30 days of the respondent receiving the VPDoR's written determination. The existence of an appeal does not suspend the VPDoR's authority to impose interim protective actions pending conclusion of the appeal.

If a respondent files an appeal, the University RIO will promptly notify ORI. [42 C.F.R. § 93.315(a)] The institutional record will be transmitted to ORI only after the conclusion of any institutional appeal, and the complete record of the appeal shall be included in the institutional record. [42 C.F.R. §§ 93.315(b), 93.316]

If the institution has already transmitted the institutional record to ORI before the appeal is filed, the University RIO will provide ORI with the complete record of the appeal once the appeal is concluded. [42 C.F.R. § 93.315(c)]

9. Research Sponsors: Federal and Non-Federal Requirements

Several research sponsors (federal and non-federal) have established policies and notification requirements regarding research misconduct. Funding associated with a particular act or acts of alleged research misconduct should be identified at the Assessment stage and reconfirmed at the Inquiry stage consistent with Section 8 of this policy in order to determine which sponsor-specific policies apply, ensure required notifications are made, and coordinate any interim administrative actions with sponsor requirements.

9.1 Public Health Service (PHS) / Office of Research Integrity (ORI)

For research supported by any PHS component (including NIH, FDA, SAMHSA, HRSA, CDC, and AHRQ) Stanford's research misconduct proceedings are governed by 42 C.F.R. Part 93. For allegations received on or after January 1, 2026, the 2024 Final Rule applies. For allegations received before January 1, 2026, the prior version of 42 C.F.R. Part 93 as published in the 2005 edition of the Code of Federal Regulations continues to apply, unless the respondent and institution both elect in writing to follow this policy. [42 C.F.R. § 93.75] ORI has oversight authority and may conduct its own review, impose additional requirements, or take independent action.

Required notifications include:

1. Written notice to ORI within 30 calendar days of the determination that an investigation is warranted, including a copy of the inquiry report. [42 C.F.R. § 93.309(a)]
2. Notification to ORI on or before the date the investigation begins. [42 C.F.R. § 93.310(b)]
3. A written request to ORI for an extension if the investigation cannot be completed within 180 days. [42 C.F.R. § 93.311(b)]
4. Transmittal of the complete institutional record to ORI after the VPDoR's final determination and conclusion of any institutional appeal. [42 C.F.R. § 93.316]
5. Immediate notification to ORI if any special circumstances arise during the proceeding, including: a health or safety risk to the public, including an immediate need to protect human or animal research subjects; HHS resources or interests are threatened; research activities should be suspended; there is reasonable indication of possible civil or criminal law violations; federal action is required to protect the interests of those involved in the proceeding; or HHS may need to take steps to safeguard evidence and protect the rights of those involved. [42 C.F.R. § 93.305(g)]
6. Prompt notification to ORI if a respondent appeals a finding of research misconduct or institutional actions, and transmittal of the complete record of any institutional appeal as part of the institutional record. [42 C.F.R. § 93.315(a)–(b)]
7. Prompt notification to ORI in advance if Stanford plans to close a case based on a respondent admission or settlement, together with the respondent's signed written admission where applicable. [42 C.F.R. § 93.317]
8. In connection with any ORI oversight review, Stanford will cooperate fully and provide ORI with all research records and evidence under Stanford's control, custody, or possession, or accessible to persons within Stanford's authority, as necessary to develop a complete record of relevant evidence. [42 C.F.R. § 93.300(g)]

9.2 National Science Foundation (NSF)

For research funded by NSF, research misconduct is governed by NSF's regulations at 45 C.F.R. Part 689. Stanford bears primary responsibility for prevention and detection of research misconduct and for the inquiry, investigation, and adjudication of alleged research misconduct involving NSF-funded research. [45 C.F.R. § 689.4(a)]

To obtain NSF deferral of independent inquiry or investigation, Stanford will: complete any inquiry and decide whether an investigation is warranted within 90 days; inform NSF's Office of Inspector General (OIG) immediately if an inquiry supports a formal investigation; keep OIG informed during the investigation; complete any investigation and reach a disposition within 180 days; and provide OIG with the final report from any investigation. If completion of an inquiry or investigation is delayed but Stanford wishes NSF deferral to continue, NSF may require submission of periodic status reports. [45 C.F.R. § 689.4(b)] All required NSF OIG notifications are coordinated by the VPDoR and the University RIO.

Stanford will also promptly notify NSF OIG during an inquiry or investigation if it becomes aware that: public health or safety is at risk; NSF's resources, reputation, or other interests need protecting; there is reasonable indication of possible violations of civil or criminal law; research activities should be suspended; federal action may be needed to protect the interests of a subject of the investigation or others potentially affected; or the scientific community or public should be informed. [45 C.F.R. § 689.4(c)]

Following completion of Stanford's institutional proceedings, OIG will assess the investigation report and either recommend adoption of the findings or initiate its own investigation. [45 C.F.R. § 689.9(a)] Before NSF makes any final finding or takes any final action, NSF will afford the respondent notice, an opportunity to provide comments and rebuttal, and an opportunity to appeal. The NSF Deputy Director adjudicates research misconduct proceedings and issues a written disposition; an affected individual or institution may appeal that decision to the NSF Director in writing within 30 days of receipt. [45 C.F.R. §§ 689.2(d), 689.9(c), 689.10(a)]

9.3 Department of Energy (DOE)

For research funded by DOE through contracts, grants, or cooperative agreements, this research misconduct policy is governed by 10 C.F.R. Part 733 and applicable award terms. DOE implements its research misconduct policy primarily through contract and financial assistance award requirements, making Stanford as contractor or recipient primarily responsible for addressing allegations of research misconduct in connection with DOE-funded research. [10 C.F.R. § 733.4]

Stanford's specific obligations with respect to any DOE-funded research misconduct matter are determined by the research misconduct requirements contained in the relevant contract or financial assistance award. [10 C.F.R. § 733.8(a)] In general, Stanford will conduct an Inquiry, Investigation, and adjudication consistent with this policy and the applicable award terms, and will cooperate fully with the DOE Contracting Officer responsible for the relevant award. Where a financial assistance agreement is involved, Stanford provides assurance that it has established an administrative process for addressing research misconduct consistent with applicable DOE requirements, and will flow down that assurance to subawards at all tiers involving research. [2 C.F.R. § 910.132]

All notifications and coordination required under DOE award terms will be handled by the VPDOR and the University RIO in consultation with the relevant DOE Contracting Officer. Stanford will use best efforts to complete any DOE-related investigation within 180 days of initiation and will provide the DOE Contracting Officer with a final written report upon completion, consistent with applicable award requirements.

9.4 Department of Defense (DoD)

For research funded by DoD components, research misconduct is governed by DoD Instruction 3210.07. After completing an inquiry that finds sufficient evidence to proceed to an investigation, Stanford will notify the individual specified in the relevant DoD award. [DoDI 3210.07, Encl. 4 § E4.1.5] The VPDOR and the University RIO coordinate all DoD notifications, given that each DoD component may have its own implementing procedures with specific notification requirements and contacts.

Note that DoD component implementing procedures may impose investigation completion deadlines shorter than the 180-day period applicable to PHS and most other federal agencies. Stanford will comply with any deadline specified in the relevant DoD component's procedures or award terms. Stanford will provide the relevant DoD component with a final

written report upon completion of any investigation, consistent with applicable award requirements.

9.5 Other Federal Agencies

For research funded by other federal agencies, including EPA, USDA, Department of Education, Department of Veterans Affairs, DOT, NASA, and others, Stanford will comply with applicable agency-specific research misconduct regulations and award terms. Most federal agencies follow the government-wide Federal Policy on Research Misconduct (65 Fed. Reg. 76260 (Dec. 6, 2000)) and have issued their own implementing regulations or policies consistent with that framework. The VPDoR and the University RIO are responsible for identifying and ensuring compliance with the specific requirements of each applicable agency, in coordination with relevant research administration offices.

9.6 Non-Federal Sponsors

For research funded by non-federal sponsors that have research misconduct provisions in their awards, Stanford will comply with the specific notification requirements set forth in those awards. The University RIO, in coordination with the SDDIL and relevant research administration offices, is responsible for identifying and ensuring compliance with any non-federal sponsor notification obligations before closing any proceeding involving a non-federal sponsor.

Many research awards also contain specific contractual provisions that may impose notification requirements beyond those set forth in general federal regulations. Stanford's obligation to comply with award terms is independent of and in addition to the regulatory requirements described in this policy. The University RIO, in consultation with the relevant SDDIL and relevant research administration offices, is responsible for ensuring that all award-specific notification obligations are identified and met.

Federal contracts subject to FAR clause 52.203-13 (Contractor Code of Business Ethics and Conduct) may require timely disclosure to the relevant agency Office of Inspector General. Where applicable, this obligation may be triggered independently of and on a shorter timeline than the inquiry and investigation windows described in this policy.

Some awards, particularly federal contracts and certain industry-sponsored research agreements, may require notification to the sponsor upon receipt of an allegation or upon commencement of an inquiry, before any determination of whether an investigation is warranted. Early identification of contracts subject to this clause by the SDDIL and prompt notification to the University RIO is therefore essential.

9.7 Coordinating Multi-Sponsor and Multi-Agency Cases

Where research involves multiple sponsors or funding sources, Stanford will coordinate its notifications and processes to ensure compliance with all applicable requirements. The University RIO, in coordination with the relevant SDDIL and relevant research administration offices, will identify all applicable sponsor requirements at the outset of any proceeding.

10. Internal Coordination / Reports to the VPDoR and University RIO

In order to assure compliance with external notification requirements and ensure appropriate oversight, SDDIL's or designees conducting proceedings on their behalf, will promptly notify the University RIO of the following: receipt of an Allegation; outcome of the Assessment, whether or not it proceeds to Inquiry; commencement of an Inquiry; conclusion of an Inquiry; commencement of an Investigation; any situation where an Investigation will take more than 180 days to complete; and

conclusion of an Investigation. The University RIO is responsible for keeping the VPDoR informed of the status of all active proceedings.

If termination of an Inquiry or Investigation before its completion is contemplated for any reason, this will be reported to the University RIO, who will consult with the VPDoR before any action is taken. If the respondent admits to research misconduct or a settlement is reached, the University RIO, in consultation with the VPDoR, will notify ORI in advance of closing the case. [42 C.F.R. § 93.317(a)]

In addition, the University RIO or the VPDoR will be notified immediately if any of the following circumstances are discovered:

- a risk to the health or safety of the public, including an immediate need to protect human or animal subjects;
- an immediate need to protect federal, non-federal, or University funds, equipment, or other interests; an immediate need to protect the integrity of the research and/or the research misconduct proceeding;
- likelihood that an alleged incident will be reported publicly; or
- a reasonable indication of a possible violation of civil or criminal law.

If the VPDoR receives such notification directly, the VPDoR will immediately notify the University RIO. The University RIO, in consultation with the VPDoR, will notify ORI as required. [42 C.F.R. § 93.305(g)]

11. Interim Administrative Actions

During the pendency of any research misconduct proceeding, the VPDoR, University RIO, or SDDIL may take interim administrative actions to protect the integrity of the research record, prevent further potential misconduct, safeguard research subjects, animals, or funds, or protect the interests of the University or any federal or non-federal sponsor. Interim actions are administrative (not disciplinary) and do not constitute a finding of misconduct.

Interim actions may include, but are not limited to: restrictions on access to research funds, equipment, laboratory space, or research records; requirements for additional oversight, supervision, or co-authorization; suspension or restrictions on the respondent's ability to apply for new grants or contracts; removal or reassignment from certain research activities or projects; and notification to journals or other parties where the integrity of the research record is at immediate risk.

Any such interim action will be documented. Where the action is taken by the SDDIL or designee, it will be promptly reported to the University RIO or VPDoR. Where the action is taken by the University RIO, it will be promptly reported to the VPDoR. The respondent will be notified and given an opportunity to respond before the action becomes effective, unless immediate action is necessary to prevent harm, in which case notification and reporting will occur as soon as practicable thereafter.

12. Notification to External Entities

Stanford will comply with the applicable requirements and regulations of its funding agencies and will cooperate with those agencies in their own procedures regarding research misconduct. All notifications to federal agencies are coordinated by the VPDoR and/or the University RIO, on the basis of information provided by the SDDIL consistent with the requirements of Sections 9 and 10 of this policy.

Where published work is found to contain fabricated, falsified, or plagiarized material, or where the integrity of published research cannot be assured, Stanford will take reasonable steps to notify the relevant journal, publisher, or other publication venue as appropriate. Stanford will cooperate with journals and publishers in any correction, retraction, or other remedial action that may be warranted as appropriate.

In the event that requests for information are received from external entities other than research sponsors, the VPDoR in consultation with the Provost will make the decision whether information about the allegations and their disposition will be disclosed publicly or to specific parties.

13. Determination of Discipline

The determination as to whether discipline is to be imposed is governed by existing University policies.

In cases involving faculty, disciplinary sanctions may be imposed through the faculty disciplinary process. Cases involving student misconduct are generally referred to a Student Judicial Officer. See, <https://share.stanford.edu/office-community-standards>. Cases involving staff members typically will be referred to the appropriate administrator.

Federal funding agencies have retained the right to impose additional sanctions beyond those applied by the institution. ORI findings are not required for institutional decisions regarding research misconduct to be considered final or to warrant discipline or remediation under this policy. [42 C.F.R. § 93.319]

14. Confidentiality and Protection from Retaliation

Stanford will, to the extent possible, limit disclosure of the identities of respondents, complainants, and witnesses to those who need to know in order to carry out a thorough, competent, objective, and fair research misconduct proceeding. [42 C.F.R. § 93.106] Except as otherwise required by law, Stanford will also limit the disclosure of any records or evidence from which research subjects might be identified to those who need to know in order to carry out a research misconduct proceeding. This limitation on disclosure no longer applies once the institution has made a final determination of research misconduct findings.

Stanford University strictly prohibits retaliation of any kind against a person who, acting in good faith, reports or provides information about suspected or alleged misconduct, or who cooperates with or participates in a research misconduct proceeding. [42 C.F.R. § 93.238; Cal. Lab. Code § 1102.5]

15. Records Retention

The University RIO will ensure that the institutional record is maintained and that all sequestered evidence, including physical objects, in a secure manner for seven (7) years after the completion of the proceeding or the completion of any HHS or other applicable federal agency proceeding, whichever is later, unless custody has been transferred to HHS or another applicable federal agency. [42 C.F.R. § 93.318]

Records of assessments that do not proceed to inquiry, and inquiry records that do not proceed to investigation, will be maintained for at least seven years after termination of those proceedings and provided to ORI upon request.

16. Special Circumstances

16.1 Multiple Institutions

If the alleged research misconduct involves multiple institutions, Stanford may work closely with the other affected institutions to determine whether a joint research misconduct proceeding will be conducted. [42 C.F.R. § 93.305(e)] The cooperating institutions will choose a lead institution to obtain research records and other evidence from the relevant institutions.

16.2 Respondent Admissions and Settlements

Stanford will promptly notify ORI in advance if at any point during the proceedings it plans to close a research misconduct case because the respondent has admitted to committing research misconduct or a settlement with the respondent has been reached. [42 C.F.R. § 93.317(a)] If the respondent admits to research misconduct, Stanford will not close the case until providing ORI with the respondent's signed, written admission. [42 C.F.R. § 93.317(b)]

16.3 Cautions and Assistance

Expert assistance should be sought as necessary to conduct a thorough and authoritative evaluation of all evidence. Precautions should be taken to avoid unresolved personal, professional, or financial conflicts of interest on the part of those involved in the inquiry or investigation. Stanford may retain outside counsel or other qualified external experts to assist with any stage of a research misconduct proceeding. Any outside party acting on Stanford's behalf will conduct proceedings in compliance with this policy and applicable federal requirements. [42 C.F.R. § 93.305(f)] Stanford retains full institutional responsibility for ensuring compliance with this policy and applicable federal requirements regardless of any outside assistance retained. [42 C.F.R. § 93.305(f)(2)]

16.4 Protections and Respondent Reputation

Where appropriate, Stanford will make all reasonable and practical efforts to protect and restore the reputation of any respondent against whom no finding of research misconduct is made. [42 C.F.R. § 93.304(c)] For protections afforded to complainants, witnesses, and committee members, including against retaliation, see Section 14.

16.5 Independent Laboratories, Institutes, and Centers

For research conducted within Stanford's independent laboratories, institutes, and centers, all provisions of this policy apply.

For academic units whose cognizant dean is the VPDoR, the Provost will designate another individual to perform these functions in order to preserve the IDO's independence under 42 C.F.R. § 93.218.

For research conducted at SLAC National Accelerator Laboratory, this policy applies to all SLAC personnel consistent with RPH 19.1. Because the SLAC Laboratory Director serves as Dean of SLAC, the Director serves as the SDDIL for research misconduct matters involving SLAC personnel or funding. Where a research misconduct matter involves both Stanford and SLAC personnel or funding, or where SLAC research is subject to DOE under 10 C.F.R. Part 733 and other applicable requirements, the University RIO will coordinate with the SLAC Director or their designee consistent with this policy.