Research Integrity Officer and Committee

The Dean will appoint the Research Integrity Officer (RIO) who will have primary responsibility for implementation of the institution’s policies and procedures on unethical practices in research. The RIO has general responsibility for overseeing the investigation of all allegations of unethical conduct in research and shall be available to:

- Consult confidentially with persons uncertain about whether to submit an allegation of unethical research practices and if the allegations do not involve unethical practices in research, refer the individual to other offices with responsibility for resolving the issue.
- Receive allegations of suspected unethical research practices and work with the RIC to determine and pursue the appropriate method for investigating and resolving these allegations.

Research Integrity Officer (RIO) Responsibilities

For research misconduct proceedings, the RIO also has specific responsibilities including but not limited to:

- Consulting confidentially with persons uncertain about whether to submit an allegation of research misconduct;
- Receiving allegations of suspected research misconduct;
- As necessary, taking interim action and notifying the ORI of special circumstances, in accordance with this policy;
- Directing and organizing the sequestration of research data and evidence pertinent to the allegation of research misconduct in accordance with this policy.
- Providing confidentiality to those involved in the research misconduct proceeding as required by 42 CFR § 93.108, other applicable law, and institutional policy;
- Overseeing the processes for notifying the respondent and providing opportunities for him/her to review/comment/respond to allegations, evidence, and committee reports;
- Overseeing the processes for informing respondents, complainants, and witnesses of the procedural steps in the research misconduct proceeding;
- In cooperation with other institutional officials, taking all reasonable and practical steps to protect or restore the positions and reputations of good faith complainants, witnesses, and committee members and counter potential or actual retaliation against them by respondents or other institutional members;
- Keeping the Research Integrity Committee and Deciding Official and others who need to know apprised of the progress of the review of the a allegation of research misconduct;
- Ensuring that ORI receives necessary notifications and reports as required by 42 CFR Part 93;
- Taking appropriate action to notify other involved parties, such as sponsors, law enforcement agencies, professional societies, and licensing boards of those actions; and
- Overseeing the maintenance of records of the research misconduct proceeding and making them available to ORI.

Research Integrity Committee (RIC) Responsibilities

The RIC will be appointed by the Dean. The committee will consist of at least three members and may include 1) Dean for Translational Biomedical Research, 2) Dean of Basic Sciences and the Graduate School of Biological Sciences, 3) the Research Integrity Officer, and 4) a representative from the Compliance Office. A representative from the Office of the General Counsel will serve as counsel to the Committee. The committee will be chaired by the Dean for Translational Biomedical Research and have the following duties:

- Receive and review reports from the RIO and other committee members regarding alleged unethical practices in research, misconduct evaluations and conclusions. The RIC retains the option of requesting additional information or pursuing additional courses of action with regard to the status of any investigation or corresponding action.
- The RIC may direct the RIO to pursue one of the following three methods of investigation detailed below.

Inquiries and Investigations

Based on the nature of the allegations and the review by the RIC, alleged unethical practices in research will be classified as either:
Allegations of Substantive Noncompliance with Regulations and Institutional Policies

Often, unethical practices in research involve noncompliance with regulatory policies including but not limited to human subject research, animal research or biosafety. These allegations should be reviewed with the RIC for confirmation that the alleged failure to comply with federal, state or institutional regulations may be assessed and managed by the primary regulatory entity within MSSM (Program for the Protection of Human Subjects, the Institutional Animal Care and Use Committee, the Institutional Biosafety Committee or the HIPAA Oversight Committee) according to the standard policies and procedures. The RIC and RIO are available for consultation regarding proper management and resolution of specific cases.

All findings that appear to require reporting to regulatory bodies must be communicated to the RIC through the RIO prior to submission. All cases in which the internal auditors are requested to perform an audit for cause will be reported to the RIC.

Findings that fall within grounds for disciplinary action as defined in the Faculty Handbook will be reported to the RIC and the Dean. The findings shall constitute prima-facie evidence of the facts contained therein in any subsequent adjudicatory proceeding held under the Medical Staff By-laws, the Faculty Handbook or the Mount Sinai Personnel Policy.

If an allegation is not substantiated, the RIO shall oversee diligent efforts by the institution to restore fully the reputation of the researcher and any others whose reputation may have been injured. The RIO will consult with the Dean regarding taking appropriate action against any complainant or witness who did not act in good faith when making unfounded allegations and/or refused to cooperate with the Investigation.

Allegations of Financial Misappropriation

Unethical practices in research may involve misuse of research funds. At the discretion of the Chief Financial Officer of MSSM, failure to comply with federal, state or institutional financial controls may be assessed and managed by the CFO with the assistance of the Compliance, Grants and Contracts and Legal offices as appropriate. The RIC and RIO are available for consultation as regarding proper management and resolution of specific cases.

All findings that appear to require reporting to regulatory bodies must be communicated to the RIC through the RIO prior to submission. All cases in which the internal auditors are requested to perform an audit for cause will be reported to the RIC.

Findings that fall within grounds for disciplinary action as defined in the Faculty Handbook will be reported to the RIC and the Dean. The findings shall constitute prima-facie evidence of the facts contained therein in any subsequent adjudicatory proceeding held under the Medical Staff By-laws, the Faculty Handbook or the Mount Sinai Personnel Policy.

If an allegation is not substantiated, the RIO shall oversee diligent efforts by the institution to restore fully the reputation of the researcher and any others whose reputation may have been injured. The RIO will consult with the Dean regarding taking appropriate action against any complainant or witness who did not act in good faith when making unfounded allegations and/or refused to cooperate with the Investigation.

Research Misconduct as Defined by 42 CFR Part 93

Allegations of research misconduct that are reported to the RIO or referred to the RIC within the MSSM will be managed by the process set forth below. This process is intended to comply with the regulatory requirements set forth in 42 CFR Part 93. Learn more about Research Misconduct as Defined by 42 CFR Part 93 (about facult y-resource s/handbook/research/ethical-practices/misconduct).