Tri-Agency Update

Marie Emond, NSERC
Karen Wallace, CIHR

CCAC National Workshop
Ottawa, Ontario
May 13, 2010

Overview

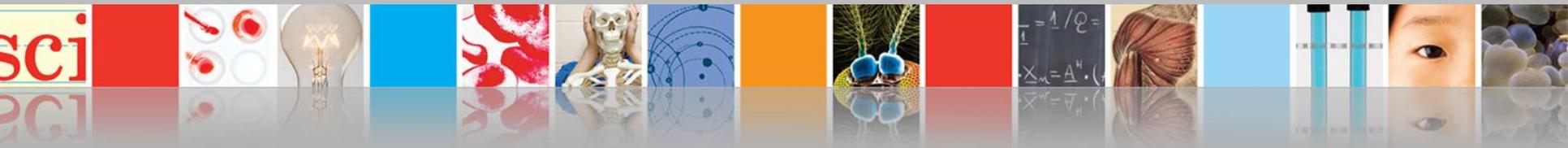**1. Tri-Agency Research Integrity Policy Framework**

2. Agencies' Roles (Limitations/Tri-Agency Process)

3. Integrity Policy Review

- Actions Taken to date to Strengthen Research Integrity
- Complementary research integrity initiatives
- Next Steps

4. Memorandum of Understanding (MOU)

- What is the MOU?
- What are the goals of the MOU?
- Schedule 3 of the MOU

1. *Tri-Agency Research Integrity Policy Framework*

As the major federal sources of funds for research and scholarship in academic institutions, CIHR, NSERC and SSHRC are committed to the highest standards of integrity in research and scholarship.

Current suite of key integrity policies include:

➤ *Tri-Council Policy Statement: Integrity in Research and Scholarship ('94)*

➤ *Framework for Tri-Council Review of University Policies Dealing with Integrity in Research (1996)*

➤ *Tri-Agency Financial Administration Guide (updated annually)*

➤ *Memorandum of Understanding on the Roles and Responsibilities in the Management of Federal Grants and Awards (2002, 2007)*

➤ *Other (e.g. instructions to applicants, Award Holder's Guide, ethics policies)*

2. *The Agencies' Roles*

➢ Review ethics and integrity policies from institutions.

➢ Require that researchers and institutions use grant and award funds with a high degree of integrity, accountability and responsibility.

➢ Conduct financial monitoring visits.

➢ Review institutional reports on confirmed cases of misconduct and advise institutions and researchers of any actions or decisions taken on specific cases where misconduct occurred.

➢ Refer any cases where there is possible criminal activity to the appropriate authorities.

Limitations of Agencies' Roles

➢ Do not have investigative powers, rely on institutions' investigations

➢ Not regulatory bodies

➢ Cannot substitute our own conclusion for the institution's

➢ Subject to *Privacy* and *Access to Information Acts* (with appropriate redactions)

➢ Cases that involve agency-funded research only

➢ 'Paper review' of cases that do not involve institutions (e.g., direct scholarship applicants)

Tri-Agency Process

1. Institution has policy and procedures in place that adhere to TCPS-I and Framework

2. Institution receives allegation and does inquiry and investigation

3. Institution provides agency with a detailed report on its process, substantiation of findings and outcome

4. If misconduct is confirmed, agency may decide to take certain actions, based on recommendations of its integrity committee

5. Agencies also receive allegations, which are referred back to the institution for investigation

3. *Integrity Policy Review*

Report to Minister of Industry

➢ At request of Minister, NSERC, SSHRC and AUCC reviewed existing policy and practices and identified possible improvements in terms of policy, implementation, and transparency
➢ Report submitted October 2008 to Minister

Action Plan

➢ CIHR agreed to participate with the other agencies in development and implementation of action plan
➢ Coordinated by committee of agency Executive Vice-Presidents and Vice-President of AUCC (Chaired by NSERC)
➢ Short and long term action plans developed and highlights posted on website along with report to Minister
➢ Agencies to strengthen overall policy framework (definition, timelines, education, whistleblower protection and duty to report)

Consultations

➢ Will include consultation with the research community and key stakeholders, building on advice from CRIC and CCA reports. AUCC will help facilitate consultations.

Actions Taken to date to Strengthen Research Integrity

➢ Report on the Review of the Policy Framework for Research Integrity and Overview of action plan made public October 2009

➢ Statistical reports made public October 2009

➢ Update in February 2010 included:

- Harmonized Tri-Agency Process for Addressing Allegations of Non-Compliance with Tri-Agency Policies

- Clarification of institutional reporting requirements for research integrity cases

- Case summaries

- Clarification of Agencies' role and how we address cases of confirmed misconduct

- Clarification of process for dealing with cases of misuse of funds.

➢ Presentations to CAURA, CRIC, NCEHR, CCA

Complementary Initiatives

➢ Canadian Research Integrity Committee (CRIC)
- Report on *The State of Research Integrity and Misconduct Policies in Canada* (October 2009)
- Health Canada – new scientific integrity policy and training plan

➢ Council of Canadian Academies (CCA)
- Definition of research integrity
- Key research integrity principles, procedural mechanisms, and practices, appropriate in the Canadian context
- Public report by September 2010

➢Some Universities
- Updating policies and procedures
- Improved quality of investigations
- Education and awareness efforts
- Whistleblower protection

Next Steps

➢ June 2010: Establish a Tri-Agency Research Integrity Advisory Group

➢ September 2010: Council of Canadian Academies' Report due

➢ Fall 2010: Develop new integrity policy, building on CCA Report

➢ 2011: Consult on new draft policy, finalize policy

➢ 2011/2012: Implement policy (Institutions will have one year from launch date to revise their policies)

4. Tri-Agency MOU

What is the MOU?

- Memorandum of Understanding on the Roles and Responsibilities in the Management of Federal Grants and Awards

- For more information and the full text:

  http://www.nserc-crsng.gc.ca/NSERC-CRSNG/Policies-Politiques/MOURoles-ProtocolRoles/index_eng.asp

What are the goals of the MOU?

- Demonstrate and explain the respective accountabilities of granting agencies and institutions in support of research, in accordance with the highest legal, ethical and financial standards.

- Describe the basic requirements for obtaining and maintaining institutional eligibility to administer agency funds.

- Harmonize agencies' policies, whenever possible.

- Clarify expectations regarding roles and responsibilities.

MOU: A Brief History

- *Phase I* (June 2002): MOU first released, included 8 Schedules

- *Phase II* (February 2007): Updated MOU released with additional 7 Schedules

- *Phase III* (Planning Stages): Tri-Agencies are currently developing a work plan for MOU Phase IIIto finalize the objectives and timeline for the project. CIHR is the lead agency for MOU Phase III.

MOU Schedule 3: Ethical Review of Research Involving Animals

➢ Research funded by the institutions involving the use of animals must be approved in accordance with animal care standards

➢ Institutes agree to:
  - participate in CCAC's Program
  - provide its IACC members with training opportunities and financial and administrative independence
  - release research funds only after IACC approval
  - inform the agencies if approval is not obtained within six months
  - suspend funding of project already underway if in contravention of CCAC, or infringe any provincial laws

➢ Agencies have a responsibility to:
  - ensure their funds are used only to support research that complies with CCAC guidelines and policies
  - transmit any ethical concerns raised during peer review
  - transmit to CCAC any allegations of non-compliance with CCAC guidelines and policies

Questions?

NSERC: Marie Émond
Research Ethics and Environmental Assessment Coordinator
Corporate Secretariat
Marie.emond@nserc-crsng.gc.ca

CIHR: Karen Wallace
Ethics Policy Advisor
Ethics Office
karen.wallace@cihr-irsc.g.ca