

THE CITY UNIVERSITY OF NEW YORK
POLICY REGARDING THE DISPOSITION
OF ALLEGATIONS OF MISCONDUCT
IN RESEARCH AND SIMILAR EDUCATIONAL ACTIVITIES

12-12-06 Draft

1. GENERAL STATEMENT OF POLICY

A fundamental purpose of the University is to foster an environment that promotes the responsible conduct of research and similar educational activities (collectively, “research”), discourages Research Misconduct, and deals promptly with any allegations or evidence of possible Research Misconduct. (Definitions of “Research Misconduct” and other terms in this Policy that appear with initial capital letters are set forth in Section 8 below.) It is the University’s basic expectation that all research conducted by members of the University community will adhere to the highest ethical and moral standards. This Policy describes the procedures to be followed by the University in connection with any allegation that University faculty, staff, and/or students may have engaged in Research Misconduct.

This Policy is based primarily on the regulations codified in the Final Rule regarding Public Health Service Policies on Research Misconduct issued by the U.S. Department of Health and Human Services, effective on June 16, 2005. This Policy applies to all research conducted by University faculty, staff, and/or students, regardless of the academic discipline of the researcher or the sponsorship or source of support for the research. This Policy does not supersede or establish an alternative to any existing University or governmental regulations, procedures, or policies regarding fiscal improprieties, conflicts of interest, ethical treatment of human or animal subjects, or criminal matters, all of which remain in effect.

Sections 2, 3, and 4 of this Policy establish the procedures for the initial evaluation, Inquiry, and Investigation of allegations of Research Misconduct involving University faculty, staff, and/or students. Section 5 sets forth the University’s responsibility to notify federal agencies and other sponsors of research, if any, of certain circumstances that may arise during a Research Misconduct Proceeding, and Section 6 sets forth certain general considerations in connection with the implementation of this Policy. Section 7 sets forth the obligation of each University faculty or staff member to report to the University any inquiry or investigation by a federal agency or other sponsor of research concerning allegations of Research Misconduct involving him or her. This Policy replaces the University’s Interim Policy and Procedure Statement regarding the Disposition of Allegations of Misconduct in Research in Science, adopted on January 29, 1990.

2. INITIAL EVALUATION

- 2.1. The President of each College within the University will designate a Research Integrity Officer to receive allegations of Research Misconduct involving faculty, other University employees, and/or students at the

College. The Research Integrity Officer will notify the subject of the allegations, the President, the University Dean for Research, and (if the research involved in the allegations is supported by a grant from a federal agency or other sponsor) the President of the Research Foundation, of the allegations that have been filed and will conduct an evaluation of the allegations in order to determine whether an Inquiry is warranted. All efforts should be made to complete the evaluation as expeditiously as possible.

- 2.2. An Inquiry is warranted if: (1) there is a reasonable basis for concluding that any of the allegations falls within the definition of Research Misconduct in Section 8.15; and (2) such allegation is sufficiently credible and specific so that potential evidence of Research Misconduct may be identified.
- 2.3. The evaluation of allegations against a faculty member or other employee of the University will be conducted by the Research Integrity Officer of the College where the faculty member or other employee has an appointment. In cases where the subject of the allegations is a faculty member with joint appointments, the evaluation will be conducted by the Research Integrity Officer of the “home College”, as determined in accordance with the University’s Joint Appointment Guidelines. If the subject of the allegations is a student, the Research Integrity Officer of the College where the student is matriculated will conduct the evaluation.
- 2.4. After the evaluation, the Research Integrity Officer will make a recommendation to the President of the College as to whether an Inquiry is warranted. The President, in consultation with the Research Integrity Officer, will make the final decision as to whether to begin an Inquiry; provided, however, that the President’s decision not to begin an Inquiry will be subject to approval by the University Dean for Research and (if the research involved in the allegations is supported by a grant from a federal agency or other sponsor) the President of the Research Foundation. If the President of the College decides that no Inquiry is warranted, the Research Integrity Officer will notify the subject of the allegations of this decision in writing.
- 2.5. If the President decides that an Inquiry is warranted, the Research Integrity Officer will notify the subject of the allegations, the University Dean for Research, and (if the research involved in the allegations is supported by a grant from a federal agency or other sponsor) the President of the Research Foundation, in writing at the time of or before the beginning of the Inquiry. The Research Integrity Officer will prepare a summary of the results of the evaluation for use in the Inquiry and provide a copy of the summary to the subject of the allegations, the President, the University Dean for Research, the President of the Research Foundation (if applicable), and the Inquiry Staff, as appointed pursuant to Section 3.1.

3. INQUIRY

- 3.1. If the President decides that an Inquiry of the allegations of Research Misconduct is warranted, the Research Integrity Officer and one or more other individuals whom the President may appoint at his or her discretion (collectively, the “Inquiry Staff”) will conduct the Inquiry.
- 3.2. The purpose of the Inquiry is to conduct an initial review of the evidence to determine whether any of the allegations warrants an Investigation. An Investigation is warranted if there is: (1) a reasonable basis for concluding that any of the allegations falls within the definition of Research Misconduct in Section 8.15; and (2) preliminary information-gathering and preliminary fact-finding from the Inquiry indicate that such allegation may have substance.
- 3.3. Upon completion of the Inquiry, the Inquiry Staff will prepare and submit a preliminary Inquiry report to the President, the University Dean for Research, and (if the research involved in the allegations is supported by a grant from a federal agency or other sponsor) the President of the Research Foundation, including a recommendation by the Inquiry Staff as to whether the President should find that an Investigation is warranted. The President will then make the decision whether an Investigation is warranted; provided, however, that the President’s decision that an Investigation is not warranted will be subject to approval by the University Dean for Research and (if applicable) the President of the Research Foundation. The President will notify the Inquiry Staff, the University Dean for Research, and (if applicable) the President of the Research Foundation, of the decision in writing.
- 3.4. The Inquiry Staff will complete the preliminary Inquiry report described in Section 3.3 within 45 calendar days of the first meeting of the Inquiry Staff unless circumstances warrant a longer period. The President will make a decision whether to proceed to an Investigation within 15 calendar days of receipt of the preliminary Inquiry report from the Inquiry Staff unless circumstances warrant a longer period. If the Inquiry takes longer than a total of 60 calendar days to complete, the record of the Inquiry will include documentation of the reasons for exceeding the 60-day period.
- 3.5. If the President decides that an Investigation is not warranted, the matter will be closed and all records of the proceedings treated as confidential pursuant to Section 6.4 to respect the rights and protect the reputations of all parties involved. All reasonable and practical efforts, if requested and as appropriate, will be undertaken to protect or restore the reputation of a subject alleged to have engaged in Research Misconduct when it is determined that an Investigation of the allegations against the subject is not warranted.

- 3.6. If the President decides that an Investigation is warranted, the Inquiry Staff will prepare a final Inquiry report that includes the following information: (1) the name and position of the subject of the allegations; (2) a description of the allegations of Research Misconduct; (3) the federal agency or other sponsor support, if any, including, for example, grant numbers, grant applications, contracts, and publications listing the support; and (4) the basis for recommending that the alleged actions warrant an Investigation.
- 3.7. The Research Integrity Officer will notify the subject of the allegations in writing whether the President has decided that an Investigation is warranted. If the President has decided that an Investigation is warranted, the notice will include a copy of the final Inquiry report and a copy of or reference to this Policy and, if applicable, the Final Rule. The Inquiry Staff will also provide the subject of the allegations an opportunity to review and comment on the final Inquiry report and will attach any comments received from the subject to the final Inquiry report.
- 3.8. The Inquiry Staff may notify the individual who made the allegations whether the President has decided that an Investigation is warranted and, if the President has decided that an Investigation is warranted, may provide relevant portions of the final Inquiry report to such individual for comment. Any comments received from such individual will be attached to the final Inquiry report
- 3.9. If the research involved in the allegation is supported by a grant from a federal agency or other sponsor, within 30 calendar days of the President's decision that an Investigation is warranted (but before the date the Investigation begins), the University Dean for Research will provide the applicable federal agency or other sponsor and the President of the Research Foundation with the written decision by the President and a copy of the final Inquiry report with any comments on the report from the subject of the allegations and the individual making the allegations attached.

4. INVESTIGATION

- 4.1. If the President decides that an Investigation of the allegations of Research Misconduct is warranted, he or she will notify the University Dean for Research, who will then appoint at least three individuals to an Investigation Committee to conduct the Investigation. In making the appointments, the University Dean for Research will consult with the President of the College and (if the research involved in the allegations is supported by a grant from a federal agency or other sponsor) the President of the Research Foundation.
- 4.2. The Investigation will begin within 30 calendar days after the President's decision that an Investigation is warranted. The Investigation Committee will notify the subject of the allegations in writing of the allegations of

Research Misconduct within a reasonable amount of time after the President's decision that an Investigation is warranted, but before the date the Investigation begins. The Investigation Committee will give the subject of the allegations written notice of any new allegations of Research Misconduct not addressed during the Inquiry or in the initial notice of the Investigation within a reasonable amount of time after a determination to pursue such new allegations.

- 4.3. The Investigation Committee will use diligent efforts to ensure that the Investigation is thorough and sufficiently documented and that it includes an examination of all research records and evidence relevant to reaching a decision on the merits of the allegations.
- 4.4. The University will take reasonable steps to ensure an impartial and unbiased Investigation to the maximum extent practicable, including participation of persons with appropriate academic expertise who do not have unresolved personal, professional, or financial conflicts of interest with those involved with the Inquiry or Investigation.
- 4.5. Upon completion of the Investigation, the Investigation Committee will prepare a draft Investigation report and provide the subject of the allegations an opportunity to review and comment on the draft Investigation report and, concurrently, a copy of, or supervised access to, the evidence on which the draft Investigation report is based. The comments of the subject of the allegations on the draft Investigation report, if any, must be submitted within 30 calendar days of the date on which the subject received the draft report. The Investigation Committee may also provide the individual who made the allegations a copy of the draft Investigation report or relevant portions of the draft report, and the comments of such individual, if any, must be submitted within 30 calendar days of the date on which he or she received the draft report or relevant portions of it.
- 4.6. The Investigation Committee will promptly review any comments on the draft Investigation report by the subject of the allegations and the individual who made the allegations and either decide not to make a finding of Research Misconduct or recommend that the Chancellor make a finding of Research Misconduct. If the Investigation Committee decides not to make a finding of Research Misconduct, it will promptly notify the President, the Research Integrity Officer, the University Dean for Research, the President of the Research Foundation (if the research involved in the allegations is supported by a grant from a federal agency or other sponsor), the subject of the allegations, and the individual who made the allegations.
- 4.7. If the Investigation Committee recommends a finding of Research Misconduct, it will submit to the Chancellor a copy of the draft Investigation report and any comments on it by the subject of the allegations and the individual who made the allegations, and the Chancellor will decide whether

to accept the Investigation Committee’s recommendation. The Chancellor will notify the Investigation Committee of the decision, and the Investigation Committee will promptly notify the President, the Research Integrity Officer, the University Dean for Research, the President of the Research Foundation (if the research involved in the allegations is supported by a grant from a federal agency or other sponsor), the subject of the allegations, and the individual who made the allegations.

- 4.8. Promptly following the Investigation Committee’s decision not to make a finding of Research Misconduct, or the decision by the Chancellor as to whether to accept the Investigation Committee’s recommendation of a finding of Research Misconduct, the Investigation Committee will prepare a final Investigation report. The final Investigation report will be in writing and will:
- (1) describe the nature of the allegations of Research Misconduct;
 - (2) describe and document the federal agency or other sponsor support, if any, including, for example, any grant numbers, grant applications, contracts, and publications listing the support;
 - (3) describe the specific allegations of Research Misconduct for consideration in the Investigation;
 - (4) if not already provided to the federal agency or other sponsor with the Inquiry report, include the University policies and procedures under which the Investigation was conducted;
 - (5) identify and summarize the research records and evidence reviewed, and identify any evidence taken into custody but not reviewed;
 - (6) for each separate allegation of Research Misconduct identified during the Investigation, provide a finding as to whether Research Misconduct did or did not occur, and if so:
 - (a) identify whether the Research Misconduct was Falsification, Fabrication, or Plagiarism, and if it was intentional, knowing, or in reckless disregard, as such terms are used in the Final Rule;
 - (b) summarize the facts and the analysis that support the conclusion and consider the merits of any reasonable explanation by the subject of the allegations;
 - (c) identify the specific federal agency or other sponsor support, if any;

- (d) identify whether any publications need correction or retraction;
 - (e) identify the person(s) responsible for the Research Misconduct; and
 - (f) list any current support or known applications or proposals for support that the subject of the allegations has pending with any federal agencies or other sponsors;
- (7) include and consider any comments made by the subject of the allegations and the individual making the allegations on the draft Investigation report; and
 - (8) maintain and provide to the federal agency or other sponsor, if any, upon request, all relevant research records and records of the Research Misconduct Proceeding.
- 4.9. If the research involved in the allegation is supported by a grant from a federal agency or other sponsor, the University Dean for Research will give the federal agency or other sponsor of the research and the President of the Research Foundation: (1) a copy of the final Investigation report and all attachments; (2) a statement of whether the Investigation resulted in a finding of Research Misconduct, and if so, who committed the Research Misconduct; (3) a statement of whether the University accepts the findings of the Investigation; and (4) a description of any pending or completed administrative action by any federal agency against the subject of the allegations to the extent such action relates to the subject matter of the sponsored research.
- 4.10. All aspects of the Investigation, including conducting the Investigation, preparing the draft Investigation report and providing it for comment in accordance with Section 4.5, deciding whether or not to make a finding of Research Misconduct in accordance with Sections 4.6 and 4.7, preparing the final Investigation report in accordance with Section 4.8, and sending the final Investigation report to the federal agency or other sponsor, if any, in accordance with Section 4.9, will be completed within 120 calendar days of the beginning of the Investigation.
- 4.11. If, upon the conclusion of an Investigation, it is determined that the subject of the allegations has not committed any Research Misconduct, the matter will be closed and all records of the proceedings treated as confidential pursuant to Section 6.4 to respect the rights and protect the reputations of all parties involved. All reasonable and practical efforts, if requested and as appropriate, will be undertaken to protect or restore the reputation of a subject alleged to have engaged in Research Misconduct but against whom no finding of Research Misconduct is made.

- 4.12 If the Chancellor finds Research Misconduct as a result of the Investigation, the University may conduct a disciplinary proceeding in connection with the finding in accordance with applicable collective bargaining agreements, the University Bylaws, and/or other applicable policies of the University.

5. NOTIFYING FEDERAL AGENCIES AND OTHER SPONSORS OF SPECIAL CIRCUMSTANCES

The University Dean for Research will immediately notify any federal agency or other sponsor providing support for research that is the subject of an allegation of Research Misconduct, as well as the President of the Research Foundation, if, at any time during any related Research Misconduct Proceeding, the University has reason to believe that any of the following conditions exist:

- (1) health or safety of the public is at risk, including an immediate need to protect human or animal subjects;
- (2) federal agency or other sponsor resources or interests are threatened;
- (3) research activities should be suspended;
- (4) there is reasonable indication of possible violations of civil or criminal law;
- (5) federal action is required to protect the interests of those involved in the Research Misconduct Proceeding;
- (6) the University believes the Research Misconduct Proceeding may be made public prematurely, so that the federal agency or other sponsor may take appropriate steps to safeguard evidence and protect the rights of those involved; and
- (7) the research community or the public should be informed.

6. GENERAL CONSIDERATIONS

- 6.1. When being interviewed by the Inquiry Staff, the subject of an allegation of Research Misconduct may be accompanied by an adviser, but not by legal counsel. An adviser may also accompany the subject of the allegation of Research Misconduct before the Investigation Committee. As an alternative, if the subject of the allegation has engaged legal counsel, then counsel will be permitted to accompany the subject of the allegations before the Investigation Committee to consult with him or her as an adviser. However, the Investigation is not a trial-type proceeding, and counsel will not be permitted to direct questions or answers or offer argument on behalf of the subject of the allegations.

- 6.2. The subject of an allegation of Research Misconduct may be suspended or removed from work under a research grant by the University Dean for Research and the President of the Research Foundation, in consultation with the President of the College, any time following the commencement of an Inquiry regarding such allegation if, in the judgment of the University Dean for Research and the President of the Research Foundation, such suspension or removal is warranted by the circumstances. Depending on developments in the Inquiry or Investigation, the University Dean for Research and the President of the Research Foundation may, in consultation with the President, restore the subject of the allegation to the work under the research grant. If there is a disagreement between the University Dean for Research and the President of the Research Foundation as to whether the subject of the allegation should be suspended or removed from, or restored to, the work under the research grant, the Chancellor shall resolve the issue. The University Dean for Research will notify the federal agency or other sponsor of the research of any suspension, removal, or restoration decision under this section.
- 6.3. If the subject of an allegation of Research Misconduct admits the accuracy of the allegation in the course of an evaluation, Inquiry, or Investigation, the matter will be directly forwarded to the President for appropriate action, which may include disciplinary action under applicable collective bargaining agreements, the University Bylaws, or other applicable policies of the University.
- 6.4. In order to protect the privacy and reputation of innocent parties and good faith accusers, all Research Misconduct Proceedings will be conducted in a fashion designed to maintain confidentiality. Knowledge of the Research Misconduct Proceedings and the disclosure of the identity of the subjects of allegations and the individuals making them, will be limited, to the extent possible, to those who need to know, consistent with a thorough, competent, objective and fair Research Misconduct Proceeding, and as allowed by law. Except as otherwise prescribed by applicable law, confidentiality will be maintained for any records or evidence from which research subjects might be identified, and disclosure of such records or evidence will be limited to those who have a need to know to carry out a Research Misconduct Proceeding.
- 6.5. Allegations that are brought in good faith may not be the basis of any retaliation against the individual making them, even if the allegations are not substantiated upon Inquiry or Investigation. All reasonable and practical efforts will be undertaken, if requested and as appropriate, to protect or restore the position and reputation of any individual making allegations in good faith and any witness or other individual involved in a Research Misconduct Proceeding, and to counter potential or actual retaliation against such individuals.

- 6.6. The Research Integrity Officers, any other members of the Inquiry Staff, members of the Investigation Committee, all others responsible for carrying out any part of a Research Misconduct Proceeding, the University Dean for Research, and the President of the Research Foundation will take precautions to ensure that they do not have real or apparent personal, professional, or financial conflicts of interest with any subject of allegations, any individual making the allegations, or any witness in a Research Misconduct Proceeding.
- 6.7. The Research Integrity Officers, any other members of the Inquiry Staff, members of the Investigation Committee, all others responsible for carrying out any part of a Research Misconduct Proceeding, the University Dean for Research, and the President of the Research Foundation will at all times conduct their activities related to the implementation of this Policy in a fashion that is consistent with their obligations under applicable federal, state, and local laws, rules, and regulations.
- 6.8. The Research Integrity Officers, any other members of the Inquiry Staff, members of the Investigation Committee, all others responsible for carrying out any part of a Research Misconduct Proceeding, the University Dean for Research, and the President of the Research Foundation may request the assistance of legal counsel from the University's Office of the General Counsel during the course of their activities related to the implementation of this Policy.
- 6.9. The University has a continuing obligation under this Policy to ensure that it maintains adequate records of a Research Misconduct Proceeding. Therefore, the Research Integrity Officer will:
 - (1) either before or when he or she notifies the subject of the allegations of the allegations or an Inquiry or Investigation, promptly take all reasonable and practical steps to (a) obtain custody of all the research records and evidence needed to conduct the Research Misconduct Proceeding, (b) inventory the records and evidence, and (c) sequester them in a secure manner; except that where the research records or evidence encompass scientific instruments shared by a number of users, custody may be limited to copies of the data or evidence on such instruments, so long as those copies are substantially equivalent to the evidentiary value of the instruments. Whenever possible, custody of the research records and evidence will be taken before or at the time the subject is notified of the allegations, and whenever additional items become known or relevant to an Inquiry or Investigation;
 - (2) where appropriate, give the subject of the allegations copies of, or reasonable, supervised access to, the research records;

- (3) undertake all reasonable and practical efforts to take custody of additional research records or evidence discovered during the course of a Research Misconduct Proceeding; except that where the research records or evidence encompass scientific instruments shared by a number of users, custody may be limited to copies of the data or evidence on such instruments, so long as those copies are substantially equivalent to the evidentiary value of the instruments; and
- (4) maintain in a secure manner sufficiently detailed documentation of the Research Misconduct Proceeding for seven years after completion of the Research Misconduct Proceeding or the completion of any federal agency or other sponsor proceeding involving the Research Misconduct allegations, whichever is later, in order to permit a later assessment by the federal agency or other sponsor or otherwise.

7. FACULTY AND STAFF OBLIGATIONS REGARDING INQUIRIES OR INVESTIGATIONS CONDUCTED BY A FEDERAL AGENCY OR OTHER SPONSOR

If a University faculty or staff member becomes the subject of an inquiry or investigation conducted by a federal agency or other sponsor of research concerning allegations of Research Misconduct by him or her, such faculty or staff member must report such inquiry or investigation in writing to the Chief Academic Officer of his or her College in the following circumstances:

- (1) if an appointment or personnel decision (e.g., reappointment, promotion, tenure) regarding a faculty member is pending at the University, the faculty member must notify the Chief Academic Officer immediately upon learning of the inquiry or investigation; and
- (2) in all other cases, a faculty or staff member must notify the Chief Academic Officer not later than 30 calendar days after learning of the inquiry or investigation if the inquiry or investigation has not been terminated by such time.

Upon receiving such notification, the Chief Academic Officer will notify the University Dean for Research and the President of the Research Foundation.

8. DEFINITIONS

- 8.1. “Chancellor” means the Chancellor of the University or, except with respect to Section 6.2, his or her designee.

- 8.2. “College” means a senior college or community college within the University, including the Graduate School and University Center, the Sophie Davis School of Biomedical Education, the City University School of Law, and the City University Graduate School of Journalism, and the University’s Central Office.
- 8.3. “Fabrication” means making up data or results and recording or reporting them.
- 8.4. “Falsification” means 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.
- 8.5. “Final Rule” means the Final Rule regarding Public Health Service Policies on Research Misconduct issued by the U.S. Department of Health and Human Services, effective on June 16, 2005 (42 CFR Parts 50 and 93).
- 8.6. “Inquiry” means preliminary information-gathering and preliminary fact-finding to determine whether an allegation of Research Misconduct may have substance and warrants an Investigation.
- 8.7. “Inquiry Staff” means the Research Integrity Officer and one or more other individuals appointed by the President of a College to conduct an Inquiry into particular allegations of Research Misconduct.
- 8.8. “Investigation” means the formal development of a factual record and the examination of that record leading to a decision not to make a finding of Research Misconduct or to a recommendation for a finding of Research Misconduct, which may include a recommendation for other appropriate actions, including, but not limited to, administrative actions brought by the U.S. Department of Health and Human Services in response or related to the Research Misconduct Proceeding.
- 8.9. “Investigation Committee” means the committee consisting of at least three individuals appointed by the University Dean for Research that is responsible for investigating charges of Research Misconduct against faculty, staff, and/or students, as applicable.
- 8.10. “Plagiarism” means the appropriation of another person’s ideas, processes, results, or words without giving appropriate credit.
- 8.11. “Policy” means this University Policy regarding the Disposition of Allegations of Misconduct in Research and Similar Educational Activities.
- 8.12. Except for the President of the Research Foundation, “President” means the President or Dean of each College, as applicable. For purposes of this Policy, the Chancellor will be deemed to be the President of the University’s

Central Office. With respect to the Research Foundation, “President” means the President of the Research Foundation or, except with respect to Sections 2.4, 3.3, 4.1, and 6.2, his or her designee.

- 8.13. “Research Foundation” means The Research Foundation of The City University of New York.
- 8.14. “Research Integrity Officer” means the official at each College designated by the President of the College to be responsible for receiving allegations of Research Misconduct, making recommendations whether such allegations warrant Inquiries, serving on any Inquiry Staff, and assisting in Investigations at the College.
- 8.15. “Research Misconduct” means Fabrication, Falsification, or Plagiarism in proposing, performing, or reviewing research, or in reporting research results. It does not include honest error or differences of opinion. A finding of Research Misconduct made under this Policy 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, as such terms are used in the Final Rule.
- 8.16. “Research Misconduct Proceeding” means any action related to alleged Research Misconduct taken under this Policy, including but not limited to, evaluations of allegations, Inquiries, Investigations, federal oversight reviews, hearings, and administrative appeals.
- 8.17. “University” means The City University of New York.
- 8.18. “University Dean for Research” means the University Dean for Research or, except with respect to Sections 2.4, 3.3, 4.1, and 6.2, his or her designee. The University Dean for Research will be responsible for monitoring the implementation of this Policy, cooperating with and making all reports to federal agencies and other sponsors and governmental bodies as required by law, and acting as the Research Integrity Officer for employees of the University’s Central Office.