Scientific Integrity

The Policy Forum “Government and quality in science” by Bernard D. Davis (10 Nov., p. 736) expresses concern that the newly established offices in the Public Health Service (The Office of Scientific Integrity and the Office of Scientific Integrity Review) will “become involved in increasingly detailed management of the practice of science.” In Davis’ view, such a concern arises from the stated role of these offices to promote high standards of scientific conduct, which he interprets to mean that the offices will be dictating on matters of scientific judgment or quality, rather than limiting their activities to scientific misconduct.

The promotion of responsible scientific conduct is a responsibility shared by the scientific community at large, grantee and applicant institutions, professional and academic associations, and all Public Health Service (PHS) components supporting research. It is entirely appropriate that the PHS offices will play a catalytic role in fostering the development of standards for research conduct. A successful collaboration between the federal and the scientific-academic communities in developing such standards is the best protection against regulatory or legislative remedies.

There are no immediate plans to implement the Institute of Medicine proposal for requiring institutions receiving PHS research grants to have policies and procedures to encourage responsible research practices (1). It should be noted however that the recently issued “Final Rule” (2) requiring institutions to have policies and procedures for inquiring into and investigating scientific misconduct concludes with a statement that institutions “shall foster a research environment that discourages misconduct . . . .” It is the response of institutions that will demonstrate whether there is a need for more formalized requirements for prevention and education activities.

The existing peer-review process is the forum for judgments about the quality of research. However, it is important for the Office of Science Integrity and the Office of Scientific Integrity Review, in collaboration with the scientific community, to do a better job of spelling out what is unacceptable scientific behavior. The limitation of the definition of scientific misconduct to only falsification and plagiarism, as proposed by Davis, would miss a range of unacceptable behaviors that have already been judged by scientific investigative panels to constitute misconduct. Standards for the responsible conduct of science should include the clearest possible statements of what is unacceptable behavior, which requires a further elaboration, not limitation, of the definition of scientific misconduct. A refined definition of scientific misconduct would not “casually fold in questions of quality or of error,” as Davis fears, but would in fact serve to more clearly separate differences in scientific judgment or honest error from misconduct.

The establishment of the Office of Scientific Integrity Review within the Office of the Assistant Secretary for Health provides a vital PHS-wide oversight role for scientific integrity activities and indicates the importance placed by the Department of Health and Human Services on dealing with scientific misconduct. We fully intend to continue working with the scientific and institutional communities in discussing such im-

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The comments by Mason and Bivens further underscore the danger of excessive governmental involvement by describing the role of the new offices as promoting “high standards of scientific conduct”—a phrase that would seem to contrast proper conduct with misconduct. But the charter for these offices assigns them a rather different responsibility: promoting “high standards of laboratory and clinical investigations in science through a prevention and education program.” This phrase, which clearly gets beyond misconduct into the area of quality, was the main cause of my concern, and it still is. While it is gratifying that the current officials in charge evidently have no intention to delve into this area, a later official might feel obligated to follow the letter of the law. This charge to the offices therefore deserves reevaluation.

We are dealing here with a gray area—and the lighter the shade of gray, the more difficult it is for the government, however laudable its intention to serve as a catalyst, to avoid imposing a rigidity that would do more harm than good. I certainly agree with Mason and Bivens that government as well as scientists and their organizations share responsibility for promoting responsible conduct; but it does not follow that all these groups share the whole range of responsibilities implied by this broad term. Mason and

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