

UNITED STATES DEPARTMENT OF AGRICULTURE
OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20250

August 5, 2011

SECRETARY'S MEMORANDUM 1074-001
USDA Scientific Integrity Policy

1. BACKGROUND AND PURPOSE

This Memorandum establishes the USDA Scientific Integrity Policy to provide guidance to Departmental leadership and scientists to ensure the highest level of integrity in all aspects of the executive branch's involvement with scientific and technological processes. This policy includes guidance to decision makers as we develop public policies based on sound science relevant to food, agriculture, natural resources, and related issues. This information will ensure public confidence by articulating the principles of scientific integrity and roles and responsibilities of all USDA employees, including career staff and political appointees, in maintaining these principles within the Department of Agriculture.

The policy directs employees, political and career, on both the proper use of scientific findings and the principles of conducting scientific activities and is consistent with the Presidential Memorandum on Scientific Integrity, dated March 9, 2009, the Office of Science and Technology Policy's 2010 guidance on scientific integrity, the Office of Management and Budget (OMB) Information Quality Guidelines¹, and the 2005 OMB Final Information Quality Bulletin for Peer Review.²

2. REFERENCES

- a. 5 USC 301, Departmental Regulations
- b. PL 106-554, The Information Quality Act
- c. 65 FR 76260-76264, Federal Policy of Research Misconduct
- d. 5 CFR 735, Employee Responsibilities and Conduct
- e. 5 CFR 2635, Standards of Ethical Conduct for Employees of the Executive Branch
- f. DR 2401-001, USDA Intramural Research Misconduct Policies and Guidelines
- g. DR 4070-735-001, Employee Responsibilities and Conduct
- h. 7 CFR 2.69, Establishment of the Office of the Chief Scientist
- i. DR 1041-001, Advisory Committee Management
- j. 5 USC 1221, Whistleblower Protection Act of 1989

¹ Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies, 2002;

<http://www.whitehouse.gov/sites/default/files/omb/assets/omb/fedreg/reproducible2.pdf>

² On December 16, 2004, OMB, in consultation with the Office of Science and Technology Policy (OSTP), issued its Final Information Quality Bulletin for Peer Review to the heads of departments and agencies (available at <http://www.whitehouse.gov/omb/memoranda/fy2005/m05-03.html>).

- k. Statistical Policy Directive No. 3, Compilation, Relevance, and Evaluation of Principal Federal Economic Indicators
- l. Statistical Policy Directive No. 4, Release and Dissemination of Statistical Products Produced by Federal Statistical Agencies

3. POLICY

Pursuant to the Presidential Memorandum on Scientific Integrity dated March 9, 2009, and complying with applicable statutes, regulations, trade agreements and/or international protocols, Executive Orders, or Presidential Memoranda, the policy of the Department is to:

- a. Promote a culture of scientific integrity. Scientific progress depends upon honest investigation, open discussion, refined understanding, and a firm commitment to evidence. Science, and public trust in science, thrives in an environment that shields scientific data and analyses from inappropriate influence. Scientific and technological findings should not be suppressed or altered;
- b. Select and retain candidates for science and technology positions at USDA, based on the candidate's scientific and technological knowledge, credentials, experience, and integrity;
- c. Utilize information based on well-established scientific processes, including peer review where appropriate, when considering scientific or technological information in policy decisions;
- d. Reflect scientific information appropriately and accurately when complying with and applying relevant statutory and regulatory standards and procedures;
- e. Make publicly available, to the extent practicable and in accordance with the Freedom of Information Act or other applicable statutes, regulations or document handling procedures and policies, the scientific or technological findings or conclusions considered or relied on in policy decisions, and provide information on the specific approach and data used to develop such scientific information;
- f. Ensure that mechanisms are in place to resolve disputes that arise from instances in which the scientific process or the integrity of scientific and technological information may be compromised;
- g. USDA shall continue to comply with the requirements of the Whistleblower Protection Act of 1989 and adopt additional procedures as are necessary to ensure the integrity of scientific and technological information and processes on which the agency relies in its decision making;
- h. USDA will continue to develop policies, in coordination with the General Services Administration and consistent with the Administration's guidance on lobbyists

serving on Federal advisory committees (FACs), for convening FACs tasked with giving scientific advice, consistent with the following:

- (1) The recruitment process for new FAC members should be as transparent as practicable. When practicable and appropriate, FAC member vacancies will be announced widely, including notification in the Federal Register with an invitation for the public to recommend individuals for consideration and for self-nominations;
 - (2) Professional biographical information (including current and past affiliations) will be made widely available to the public (e.g., via a Web site) subject to Privacy Act and other statutory/regulatory considerations;
 - (3) The selection of members to serve on a scientific or technical FAC will be based on expertise, knowledge, and contribution to the relevant subject area. Additional factors for consideration will include the availability of the member to serve, diversity among members of the FAC, and the ability to work effectively on advisory committees. Committee membership should be fairly balanced in terms of points of view represented with respect to the functions to be performed by the FAC;
 - (4) Except when prohibited by law, USDA will make all Conflict of Interest waivers granted to the committee members publicly available; and
 - (5) Except when explicitly stated in a prior agreement between USDA and a FAC, all reports, recommendations, and products produced by FACs will be treated as solely the findings of such committees rather than of the U.S. Government, and thus will not be subjected to intra- or inter-agency revision.
- i. USDA scientists are encouraged but not required to participate in communications with the media regarding their research with appropriate coordination with their immediate supervisor and public affairs office. The role of the public affairs office is to assist with presentation, style, and logistics of the communication, not to alter its substance; and
 - j. Promote and facilitate, as permitted by law, the professional development of USDA scientists and engineers, and analysts in a manner that is consistent with Federal rules of ethics, job responsibilities, and existing agency policies. Promotion and facilitation of professional development include:
 - (1) Encouraging publication of research findings in peer-reviewed, professional, or scholarly journals;
 - (2) Encouraging presentation of research findings at professional meetings;
 - (3) Allowing USDA scientists and engineers to become editors or editorial board members of professional or scholarly journals;

- (4) Allowing participation in professional societies, committees, task forces and other specialized bodies of professional societies, including removing barriers for serving as officers or on governing boards of such societies; and
- (5) Allowing Government scientists and engineers to receive honors and awards for their research and discoveries with the goal of minimizing, to the extent practicable, disparities in the potential for private-sector and public sector scientists and engineers to accrue the professional benefits of such honors or awards.

4. RESPONSIBILITIES

This Memorandum establishes the USDA's scientific integrity policy to direct the conduct of scientific investigation, management of scientific activities, and use of scientific information.

a. This policy applies to:

- (1) All USDA Mission Areas, Agencies, and Offices;
- (2) All USDA employees, political and career, who engage in, supervise, or manage scientific activities, analyze and/or publicly communicate information resulting from scientific activities, or who utilize the information in decision making; and
- (3) All contractors who assist with developing or applying the results of scientific and technical activities.

b. The USDA Chief Scientist is directed to implement all aspects of this directive. Specific responsibilities, which may be delegated as appropriate, include:

- (1) Seek consultation with the USDA Science Council in regard to implementation of this policy;
- (2) Review Mission Area, Agency, and Office compliance with this policy;
- (3) Develop training to ensure that employees understand the policy and are adequately prepared to comply; and
- (4) Issue and update as appropriate, a Departmental Regulation.

c. The USDA Agencies and Offices will:

- (1) Adhere to the Departmental policy on scientific integrity;
- (2) Develop an implementation plan that addresses communications education, training, and fiscal resources to support scientific integrity as appropriate; and

(3) Monitor and report compliance with the USDA Scientific Integrity Policy.

5. IMPLEMENTATION

This policy is effective immediately and will remain in effect for one year. Prior delegations of authority, administrative regulations, and other directives not inconsistent with the provisions of this Memorandum shall remain in full force and effect.

/s/Thomas J. Vilsack
Secretary of Agriculture