**NIH CASE STUDIES**

**INTEGRITY IN RESEARCH**

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Integrity in research includes not just the avoidance of wrongdoing but also the rigor, carefullness, and accountability that are hallmarks of good scholarship.

The National Institutes of Health (NIH) is closely monitoring situations where the Principal Investigator has intentionally:

- Received duplicate funding
- Failed to disclose conflicts of interest
- Misrepresented the facts
- Overcommitted and misrepresented other time commitments

The following vignettes are from actual case studies which resulted in funds returned to NIH, employment actions and, in two cases, criminal conviction.

**NIH CONCERNS**

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**CASE STUDY 1 - DUPLICATE FUNDING**

**OUTCOME: EMPLOYMENT ACTION AND FUNDS RETURNED TO NIH**

- NIH-funded scientist is employed by an American medical school on a 12-month schedule, and a foreign university on a six-month contract.
- The foreign university contract includes >$500,000 per year of funding support, lab space, equipment, and trained staff.
- On internal disclosure documents, PI checks “no” when asked about outside research activities.
- After receiving NIH support for a project proposal through a grant award, the PI has the same proposal translated to a foreign language and submitted to a foreign government funding agency.
- PI is asked on a standard NIH progress report, “Has there been any change in other research support for your individual research endeavors?”. PI answers, “No, nothing to report” - a false statement.

**CASE STUDY 2 - UNDISCLOSED CONFLICT OF INTEREST**

**OUTCOME: EMPLOYMENT ACTION**

- NIH-funded scientist is employed by an American medical school.
- Scientist owns majority equity interest in a foreign company valued at $20 million. The company is receiving patents and selling products derived from scientist’s American NIH-funded research. The American medical school is unaware of the scientist’s equity interest in the foreign company.
- On annual internal disclosure form, scientist checks “no” when asked about significant financial interests – a false statement.
- On NIH grants, the institution declares scientist has no financial conflicts of interest to disclose or manage.

**CASE STUDY 3 - MISREPRESENTATION**

**OUTCOME: EMPLOYMENT ACTION**

- NIH-funded scientist is employed 100% by an American medical school; and a foreign university on a full-time “Talents” contract.
- NIH learns of the Talents award and asks the American medical school for information to assess possible scientific, budgetary, or commitment overlap.
- The American medical school asks the scientist about these activities, and scientist denies any foreign employment. Scientist says that the Talents award is “just an honor, nothing more.”
- The American medical school discovers signed Talents application and contract, which includes financial support for research; signed foreign university contract; and funded foreign grants. The Talents award includes start-up funds, annual research funds, lab space, equipment, trained staff, annual salary, a housing allowance, and covered travel.
- The scientist continued to deny any foreign activities other than the “honor.”

**CASE STUDY 4 - OVERCOMMITMENT AND MISREPRESENTATION**

**OUTCOME: EMPLOYMENT ACTION AND FUNDS RETURNED TO NIH**

- NIH-funded scientist maintains full-time employment at both an American medical school and a foreign university simultaneously.
- In addition to NIH grants, the scientist received five foreign grants over seven years through this foreign affiliation; two of which are still active. The foreign employment and grants are not disclosed to NIH on Federal grant applications nor to the American school.
- When approached with this information, the scientist denies the foreign employment or being PI on the grants.
- The American medical school determined the scientist played a major role in writing and overseeing the foreign grants, and spent an inordinate amount of time at the foreign university.

*The University of California mandates compliance with all research sponsor policies, federal laws, and UC Policies related to research. See University Policy on Integrity in Research. These case studies were summarized and published by NIH. For more details, click [here](#).

Questions? Contact your campus Research Compliance team or Marci Copeland, Associate Director Research Security and Export Control.