

Research Misconduct Policy Comparison: Executive Summary

1. Definition and Scope

Area	Current Policy	Revised Policy	Significance
Definition	FFP + other deviations	FFP only	Narrows scope
Exclusions	Less explicit	Explicit exclusions	Clarifies boundaries
Scope	Broad	Clarified + 6-year limit	Aligns with federal rules

2. Federal Alignment

Area	Current	Revised	Significance
Regulations	Older CFR	2024 CFR update	Ensures compliance
Proof Standard	Implied	Explicit	Improves defensibility

3. Investigation Standards

Area	Current	Revised	Significance
Elements	Less defined	3-part test	Standardized decisions
Scope	General	All leads pursued	Expanded obligation

4. Documentation

Area	Current	Revised	Significance
Documentation	General	Highly detailed	More admin work
Records	Less defined	Formalized	Audit-ready

5. Roles

Area	Current	Revised	Significance
RIO	Defined	Expanded duties	Centralized authority
Committees	Standard	More requirements	Improved integrity

6. Rights

Area	Current	Revised	Significance
Respondent	Basic rights	Expanded rights	Stronger due process
Retaliation	Present	Operationalized	Reduced liability

7. Evidence & Timelines

Area	Current	Revised	Significance
Evidence	General	Detailed handling	Stronger defensibility
Timelines	90/180 days	Same + stricter	More accountability

Key Takeaways

The revised policy aligns with updated federal regulations, narrows the definition of misconduct to FFP only, adds significant procedural and documentation requirements, strengthens due process protections, and increases administrative burden while improving compliance and risk management.