

Category	Difference	What changed (old → revised)	Practical impact
Substantive	Regulatory alignment	Adds explicit applicability of revised 42 CFR Part 93 (2024 Final Rule) for proceedings initiated on/after Jan 1, 2026	Drives which federal procedural requirements govern cases going forward
Substantive	Timelines extended	Inquiry: 60 → 90 days; Investigation: 120 → 180 days	More time to complete stages; slower resolution, potentially more thorough record-building
Substantive	Institutional record requirement	Adds defined “ Institutional Record ” with detailed contents + index and description of sequestered-but-not-relied-up on materials	Increases documentation burden; improves auditability/ORI review readiness
Substantive	Sequestration scope expanded	Sequester/obtain custody of evidence including items ultimately not relied upon ; requires inventory + indexing	Stronger evidence preservation; reduces spoliation challenges
Substantive	Inquiry report requirements expanded	Adds required elements: aliases, committee expertise, sequestration inventory/method, transcripts, timeline/procedural history, forensic analyses, institutional actions/communications	Much more detailed inquiry report; higher compliance workload
Substantive	Interview requirement softened at inquiry	Inquiry interviews described as “ not required ” (though “normally” conducted)	Gives discretion to omit inquiry interviews; may shift fact development to investigation stage

Substantive	Plagiarism carve-outs clarified	States plagiarism excludes self-plagiarism and authorship/credit disputes ; adds “common methodology phrasing” nuance	Narrows what qualifies as misconduct; reduces misclassification risk
Substantive	Assessment role broadened	Assessment can be done by RIO or designated institutional official	Operational flexibility; changes who may perform initial triage
Substantive	Additional respondents handling	Explicit options: add respondents to existing case or run separate inquiry	Procedural clarity for multi-respondent situations
Minor	Definitions expanded/modernized	Adds explicit mens rea definitions (intentional/knowing/reckless) and expands “Evidence”	Improves clarity; little change to outcomes unless disputed intent is central
Minor	Notification/record phrasing	Respondent comments explicitly included in institutional record and addressed in final report	Clarifies handling; modest process tightening
Minor	Shared instruments evidence standard	“Copies” described as “substantially equivalent copies”	Small wording change that supports defensibility of copied data
Minor	“Shall” vs “may/when applicable”	Some protections/restoration/interim action phrasing becomes more conditional	Slightly more discretion; may affect expectations but not core structure
Editorial	CFR cross-reference cleanup	Updates CFR section numbers/refs (incl. “subsequent use” citation)	Housekeeping to match newer rule text; minimal day-to-day impact

Editorial	Terminology/consistency	Edits like “promptly,” wording consistency, minor grammar	Readability only
Editorial	Name/branding updates	Institutional naming updates already noted in header; revision continues consistent naming	No procedural impact