



UNIVERSITY OF CALIFORNIA

Ahmet Palazoglu
Chair, Assembly of the
Academic Senate
Faculty Representative,
UC Board of Regents
Academic Senate

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December 19, 2025

Theresa Maldonado
Vice President, Research & Innovation

Re: Systemwide Review of Presidential Policy on Responding to Allegations of Research Misconduct

Dear Vice President Maldonado:

As requested, I distributed for systemwide Academic Senate review the proposed revisions to the Presidential Policy on Responding to Allegations of Research Misconduct. All 10 Academic Senate divisions and three systemwide Senate committees ([UCAP](#), [UCORP](#), and [UCFW](#)) submitted comments. These were discussed at Academic Council's December 17, 2025 meeting, and the compiled feedback is attached for your reference.

The revisions replace the former University Policy on Integrity in Research and align UC's 1990 policy with updated research misconduct regulations issued by the Department of Health and Human Services (HHS) Office of Research Integrity (ORI). The policy adopts the federal definitions of research misconduct, reaffirms UC's commitment to responding to allegations and fostering an ethical research environment, and directs campuses to implement local procedures, including appropriate sanctions when allegations are substantiated. It also permits campuses to establish different procedures for cases involving federally funded versus non-federally funded research.

Overall, reviewers agree that the revisions appropriately align the policy with federal regulations and modernize UC's approach to research integrity. They acknowledge the policy's stated commitment to confidentiality and whistleblower protection, while recommending that these protections be strengthened and more explicitly articulated. Reviewers also identify several areas where the policy would benefit from clearer definitions, stronger systemwide guidance, and additional safeguards for researchers and complainants.

Clarification of Definitions

Many reviewers note that the draft would benefit from fuller and more

precise definitions. Recommendations include the following:

- Explicitly include digital materials such as electronic lab notebooks, shared drives, datasets, code, and computational workflows in the definition of “research records.”
- Clarify the definition of “plagiarism” to include misappropriation of data, figures, images, code, and other research outputs, as well as the exclusion of contributors, consistent with federal standards.
- Define terms such as “objectivity,” “rigor,” and “research standards” to avoid subjective interpretation.
- Revise or rename Section III to avoid conflating general expectations for good research practice with conduct that constitutes research misconduct.
- Clarify the definition of “lab director,” which is carried forward from the prior policy and may be overly broad in the absence of a clearer definition.

Concerns About the Policy’s Scope and Structure

UCSB raises a concern that the revised policy removes the explicit definition of “research integrity” found in the original policy, which risks creating a gap in UC’s broader framework for ethical research conduct. As remedies, UCSB recommends either expanding the preamble to define research integrity explicitly or developing two related policies: one articulating research integrity principles and one describing misconduct procedures. UCB’s Committee on Research similarly emphasizes the need for fuller context, definitions, and examples to preserve UC’s broader articulation of ethical research expectations and to avoid narrowing the practical understanding of federal standards.

UCORP emphasizes that the revised policy is intended to implement the federal regulations and should therefore remain narrowly focused on conduct falling within the definitions of research misconduct in Section II. References to broader standards not tied to those definitions could create confusion about the policy’s purpose and scope. The policy should be simplified accordingly.

Local Implementation Guidance

Many divisions observe that the policy assigns substantial responsibility to campuses without specifying minimum expectations for local implementation. Reviewers recommend clarifying required elements of the assessment, inquiry, and investigation stages, including committee training, documentation standards, timelines, and conflict-of-interest safeguards.

Several divisions also request clearer guidance on when campuses may develop different procedures for federally versus non-federally funded research, particularly for projects with mixed or evolving funding sources. Reviewers further request clearer descriptions of the responsibilities of

Research Integrity Officers and Deciding Officials, clarification regarding appeal rights, and stronger requirements that campuses specify how sanctions will be imposed once misconduct is substantiated. UCSC also notes ambiguity regarding whether the duty to report applies to suspected misconduct or only known misconduct and recommends clarifying reporting obligations.

Due process, Confidentiality, and Fairness Considerations

Reviewers emphasize the importance of clear due process protections for respondents and request clearer expectations regarding confidentiality and fairness in the handling of allegations. They recommend establishing clearer timelines for each stage of the process and ensuring that respondents receive timely access to relevant information. Several committees also recommend reinstating language describing what is *not* research misconduct and explicitly referencing applicable UC whistleblower and anti-retaliation policies to clarify how individuals who raise concerns are protected outside this policy. UCB additionally recommends including a concise, standalone section summarizing the rights and protections afforded to respondents.

Resource Concerns

Multiple divisions raise concerns about the resources required to implement the updated policy. They note that Research Integrity Offices may lack sufficient staffing or technical expertise to manage, preserve, and review large and complex digital research records during investigations of complex digital records, and recommend systemwide support for training, education, and infrastructure.

Timelines, Multi-Campus Coordination, and Reporting

Reviewers request greater clarity about expected timelines, particularly regarding extensions beyond those permitted under federal regulations. They note that prolonged investigations burden both respondents and complainants and recommend that extensions require justification. Committees also request clearer guidance on federal reporting obligations, including responsibilities for notifications to agencies beyond ORI, such as NIH and NSF.

Generative AI and Emerging Forms of Misconduct

Many divisions note that the draft policy does not address challenges posed by generative AI. They recommend acknowledging that AI-generated data, images, and text may be used to fabricate or falsify research outputs or raise plagiarism concerns, and they urge UCOP to provide explicit guidance on AI-related misconduct risks.

Responsibilities of Principal Investigators and Supervisors

Several reviewers express concern that the revised language may broaden the responsibilities of principal investigators or imply PI accountability for

the independent actions of students or research staff. They recommend clarifying that supervisory responsibility should not be interpreted as strict liability and that institutional accountability remains essential.

Additional Issues Raised by Reviewers

Some divisions emphasize the need to protect against politically motivated or targeted inquiries and recommend defining terms such as “objectivity” and “rigor” to prevent misuse. Several also stress the importance of alignment with related UC policies, including Academic Personnel Manual (APM) - 015 and the UC Research Data Policy, to avoid duplicative or conflicting requirements. UCR recommends removing references to the “Gold Standard Science” documents as external federal materials rather than UC policy, and UCSD similarly cautions against basing UC policy on external federal frameworks that may change over time. Reviewers also request practical examples aligned with federal standards to distinguish honest error from misconduct and clarify when selective reporting or analytical manipulation may constitute falsification, as well as a flowchart illustrating procedural stages.

Overall, Senate reviewers support bringing UC policy into compliance with updated federal regulations and agree that a strong policy on research integrity is essential. They request clearer definitions, stronger due process protections, more detailed implementation guidance, and greater attention to emerging issues such as digital research environments and AI-generated content. Many also emphasize that additional training and resources will be needed to implement the policy effectively.

Sincerely,



Ahmet Palazoglu
Chair, Academic Council

cc: Academic Council
Research Policy Analyst Miller
Senate Division Executive Directors
Senate Executive Director Lin



December 5, 2025

AHMET PALAZOGLU
Systemwide Academic Senate/Council Chair

Subject: Berkeley Division – Proposed Presidential Policy on Responding to Allegations of Research Misconduct

Dear Chair Palazoglu,

On December 1, 2025, the Berkeley Division of the Academic Senate's Divisional Council (DIVCO) endorsed the committee comments from the Committee on Research (COR) on the proposed *Presidential Policy on Responding to Allegations of Research Misconduct* under the Consent Calendar. COR's comments include eight recommendations to address their concern that the proposed policy is too vague. I encourage you to evaluate the enclosed committee comments for more details.

Sincerely,

Mark Stacey
Chair, Berkeley Division of the Academic Senate

Enclosure

cc: Thomas Philip, Vice Chair, Berkeley Division of the Academic Senate
Monica Lin, Executive Director, UC Systemwide Academic Senate
Jocelyn Surla Banaria, Executive Director, Berkeley Division of the Academic Senate
Abby Dernburg, Chair, Committee on Research
Patrick Allen, Senate Analyst, Committee on Research



320 STEPHENS HALL
UNIVERSITY OF CALIFORNIA

November 24, 2025

CHAIR MARK STACEY
Academic Senate

Re: Proposed Presidential Policy on Responding to Allegations of Research Misconduct

Dear Chair Stacey,

At our meeting on November 13, the Committee on Research (COR) discussed the proposed Presidential Policy on Responding to Allegations of Research Misconduct and heard a thoughtful presentation from AVCR Lok Siu (*invited guest of COR*) on Berkeley's implementation of UCOP policy. Our comments focus on the implications for researchers at UC Berkeley, the clarity and completeness of the proposed definitions, and the practical consequences for campus procedures.

1. Plagiarism should explicitly include misappropriation of data, figures, and results

The draft Policy adopts federal definitions of research misconduct, including plagiarism. However, the language in some cases appears narrower than federal guidance in a way that could mislead researchers or other parties if left unclarified.

The [Federal Register](#) defines plagiarism as "...the appropriation of another person's ideas, processes, results, or words without giving appropriate credit." This definition unambiguously includes research data (raw or processed), images, blots, graphs, quantitative results, methods, software, analyses, and unpublished findings. As written, the draft UC policy risks giving the impression that plagiarism is limited to "verbatim or nearly verbatim copying of language," which contradicts both federal intent and accepted practice across research communities.

Recommendation:

The policy should explicitly state that plagiarism includes misappropriation of data, figures, images, graphical elements, datasets, software, or other research results, whether published or unpublished. This aligns UC policy with [Public Health Services 42 CFR 93](#) and the [Federal Policy on Research Misconduct](#).

2. Authorship misconduct: Exclusion of contributors should be recognized as research misconduct when it constitutes plagiarism

COR recognizes that authorship disputes per se are not "research misconduct" under federal rules. However, when an authorship decision knowingly excludes contributors of ideas, processes, or results, this is substantively indistinguishable from plagiarism. The VCRO office

receives many authorship-related complaints each year, and the revised policy provides an opportunity for clearer guidance.

Recommendation:

While authorship disputes remain outside the scope of research misconduct, the knowing exclusion of an individual who contributed ideas, processes, or results constitutes plagiarism and should fall within the definition of research misconduct. This distinction mirrors federal intent and will assist researchers and adjudicators in evaluating such cases.

3. The definition of “research records” should be broadened to reflect contemporary research practice

Federal regulations emphasize sequestration and review of the “research record,” and the VCRO presentation outlines expanded sequestration and reporting requirements under the revised regulations. The definition of research records should explicitly include:

- electronic laboratory notebooks
- shared drives and collaborative tools (e.g., Google Docs, Slack)
- computational workflows, scripts, code, and version-control repositories
- training and evaluation datasets
- intermediate data products generated by software tools

Because many research areas rely heavily on digital artifacts, the policy should state clearly that these materials are considered part of the research record and may be subject to sequestration and review.

4. Generative AI has created novel opportunities for research misconduct that should be addressed in this Policy or in future policies

The current draft does not address issues surrounding generative AI systems that can produce scholarly text, analysis pipelines, figures, or pseudo-data. These tools accelerate research but also introduce new sources of risk:

- AI tools are often trained on large corpora of published work without attribution, and AI-generated text may include unattributed derivatives of prior scholarship.
- AI-generated figures can reproduce or approximate existing scientific images without watermarking.
- Large language models can fabricate references, data, or methods that may appear credible.
- The boundary between “assistance” and “generation of substantive contributions” is becoming increasingly blurred.

These concerns intersect directly with plagiarism, falsification, and fabrication. Although a comprehensive policy that addresses the use of AI in research may be beyond the scope of the Policy under review, the rising importance of these issues should be acknowledged.

Recommendation:

The Presidential Policy should include a subsection stating that use of generative AI must comply with all research-misconduct provisions. At minimum:

- Researchers remain responsible for verifying the accuracy and provenance of AI-generated text or figures.
- Incorporation of AI-generated material that reproduces or derives from others' work without attribution constitutes plagiarism.
- Use of AI systems to produce fabricated data or results constitutes research misconduct.
- UC locations may develop additional discipline-specific guidance or restrictions.

Addressing these issues now will reduce ambiguity as these tools become ubiquitous.

5. Clarification of what is not research misconduct should not narrow the scope of federal standards

The draft Presidential Policy correctly notes that plagiarism does not include self-plagiarism or authorship disputes. However, without additional clarification, this language may give researchers an unduly narrow view of what can constitute research misconduct under federal definitions. Certain practices—such as intentionally omitting contradictory data, manipulating statistical analyses (e.g., p-value hacking), or selectively excluding relevant prior work to misrepresent novelty—can meet the federal definition of **falsification** when they distort the research record.

At the same time, other questionable practices (e.g., excessive self-citation or general bias) do not meet the federal threshold unless they involve intentional misrepresentation. The draft Policy would benefit from distinguishing these categories more clearly.

Recommendation:

The Presidential Policy should provide concise examples aligned with federal standards to clarify that some forms of selective reporting or analytical manipulation may constitute falsification, while other poor practices do not. This will help ensure shared understanding of the boundaries of research misconduct.

6. Due process and protection of complainants

COR strongly supports the policy's commitment to confidentiality and whistleblower protection, as emphasized in both the VCRO presentation and the systemwide review letter. Berkeley's experience suggests:

- complainants often fear retaliation from supervisors or departments;
- respondents frequently need clearer assurances of procedural fairness and transparency;
- both parties would benefit from explicit statements about rights, access to records, and timelines.

Recommendation:

The policy should include a concise section summarizing the rights and protections of complainants and respondents, reflecting the expanded transcript-access rules and the clarified limitations on confidentiality in the federal regulations.

7. Local implementation must address variation across disciplines

The AVCR explained how the campus Research Integrity Office coordinates with multiple units and the complexity of cases involving multiple institutions. Because research practices differ

widely across disciplines, the systemwide policy should explicitly allow UC locations to supplement the policy with discipline-specific guidance—particularly regarding data management, image integrity, computational reproducibility, and the use of AI.

8. Timeline extensions should not become routine

The revised federal regulations lengthen the inquiry (90 days) and investigation (180 days) periods. COR recognizes the value of these extensions but notes that prolonged processes place substantial burdens on complainants, respondents, and research groups.

Recommendation:

The policy should state that extensions beyond federal limits require documented justification and should be minimized. UC should aim to resolve inquiries and investigations as expeditiously as feasible.

Summary

COR appreciates the effort to modernize UC's research misconduct policy and align it with updated federal regulations. Clearer guidance on the scope of plagiarism, explicit consideration of AI-related risks, and stronger treatment of authorship-related plagiarism will better protect the rights of researchers, strengthen research integrity, and reduce ambiguity in policy implementation across the UC system.

We appreciate the opportunity to weigh in on these matters.

Regards,



Abby F. Dernburg, Chair
Committee on Research

AD/pga

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December 10, 2025

Ahmet Palazoglu
Chair, Academic Council

RE: Proposed Presidential Policy on Responding to Allegations of Research Misconduct

Dear Ahmet,

The proposed Presidential Policy on Responding to Allegations of Research Misconduct was forwarded to all standing committees of the Davis Division of the Academic Senate. Five committees responded: Research (COR), and the Faculty Executive Committees of the College of Agricultural and Environmental Sciences (CAES), the College of Biological Sciences (CBS), the College of Letters and Science (L&S), and the School of Medicine (SOM).

COR, L&S, SOM, and CBS express no objections to the proposed Presidential Policy. CAES, however, expresses concern regarding the lack of clarity within the policy, noting that it lacks a clear definition for the term “objectivity” which creates uncertainty and risk. CAES adds that it is unclear what revisions were required for alignment with federal rules, leaving faculty to “parse an overwhelming number of edits without context.”

The Davis Division appreciates the opportunity to comment.

Sincerely,

Katheryn Niles Russ, Ph.D.
Chair, Davis Division of the Academic Senate
Professor of Economics
University of California, Davis

Enclosed: Davis Division Committee Responses

c: Monica Lin, Executive Director, Systemwide Academic Senate
Michael LaBriola, Assistant Director, Systemwide Academic Senate
Edwin M. Arevalo, Executive Director, Davis Division of the Academic Senate

December 3, 2025

Kadee Russ

Chair, Davis Division of the Academic Senate

RE: Request for Consultation on the Proposed Presidential Policy on Responding to Allegations of Research Misconduct

Dear Kadee:

The Committee on Research (COR) has reviewed the RFC on the Proposed Presidential Policy on Responding to Allegations of Research Misconduct.

The COR supports the proposed changes and does not have any additional feedback at this time.

Sincerely,



Eliza Bliss-Moreau
Chair, Committee on Research

Proposed Presidential Policy on Responding to Allegations of Research Misconduct

FEC: College of Agricultural and Environmental Sciences Committee Response

December 3, 2025

Across the comments received from FEC members, several concerns surface repeatedly. The first involves the introduction of the term “objectivity” into the expectations for research conduct. Members note that the policy offers no definition, no criteria for assessing objectivity, and no indication of who bears the burden of demonstrating it in the context of a misconduct allegation. Given the potential consequences of such proceedings, adding an undefined epistemic standard—one that varies widely across disciplines—creates uncertainty and risk. It also opens the door to interpretive disputes about scholarly practice that extend well beyond the federal definition of research misconduct, which focuses strictly on fabrication, falsification, and plagiarism.

A second concern is the scale and opacity of the revisions. Members observe that the draft appears to be a substantial rewrite rather than a limited update to ensure compliance with the revised federal regulations. Without a clear explanation of which changes are required for alignment with ORI and PHS rules—and which represent broader policy shifts—faculty are left to parse an overwhelming number of edits without context. This creates avoidable skepticism about the intent and implications of the revisions.

A third and more structural issue involves the operational burden placed on departments and units. The draft relies heavily on local implementation: each unit is expected to identify a Research Integrity Officer and a Deciding Official, and to manage inquiries and investigations under procedures they devise themselves. FEC members point out that many units lack the personnel depth, administrative infrastructure, or conflict-free supervisory structure to take on these responsibilities. Small departments, core facilities, and interdisciplinary centers are particularly ill-equipped. In addition, asking units to investigate their own faculty or supervisors introduces significant conflict-of-interest risks and threatens procedural consistency across campus.

Taken together, these observations highlight a core governance concern: the policy appears to decentralize responsibilities that, in most institutions, are centralized precisely because of the legal, ethical, and procedural expertise required. The lack of a clear rationale for this decentralization, combined with the introduction of ambiguous language and extensive undocumented revisions, suggests that further clarification and possible restructuring are warranted before the policy can be implemented effectively or fairly.

Published work in the domain of responsible innovation and research provides easily accessible framings for what is intended from this policy.

Proposed Presidential Policy on Responding to Allegations of Research Misconduct

FEC: School of Medicine Committee Response

December 3, 2025

FEC requested consultation from the Committee on Research Affairs (CRA) for this document; the CRA comments are: The policy simply directs campuses to implement their own procedures, and nothing in the presidential policy itself raises concerns.

November 10, 2025

AHMET PALAZOGLU
CHAIR, ACADEMIC COUNCIL

Re: Proposed Presidential Policy on Responding to Allegations of Research Misconduct

The Irvine Division Cabinet discussed the proposed Presidential Policy on Responding to Allegations of Research Misconduct at its meeting on November 4, 2025. The Council on Research, Computing, and Libraries (CORCL) and the Committee on Privilege and Tenure (CPT) also reviewed the proposal. The committees' feedback is attached for your review.

Some Cabinet members expressed concern with the updated policy text (page two, section III. Policy Text) that reads, "all those engaged in research are expected to pursue the advancement of knowledge while meeting the highest standards of honesty, accuracy, and objectivity." They suggested that a definition of the word "objectivity" should be included, making it clear how objectivity is measured and determined. Without such a definition, it could be misinterpreted and used inappropriately. For example, it could be weaponized against research areas that may have fallen out of favor with the federal government or federal funding agencies. Finally, if "objectivity" is intended to mean the absence of financial conflicts, this could be stated directly.

The Irvine Division appreciates the opportunity to comment.

Sincerely,



Jane Stoever, Chair
Academic Senate, Irvine Division

Cc: Lisa Grant Ludwig, Chair Elect
Jisoo Kim, Executive Director
Gina Anzivino, Associate Director

October 23, 2025

**JANE STOEVER, CHAIR
ACADEMIC SENATE, IRVINE DIVISION**

RE: Proposed Presidential Policy on Responding to Allegations of Research Misconduct

At its October 16, 2025 meeting, the Council on Research, Computing, and Libraries (CORCL) discussed the proposed Presidential Policy on Responding to Allegations of Research Misconduct.

The proposed policy applies solely to federally-funded research and is explicitly written to satisfy new Public Health Service Regulations and federal policy on research misconduct.

Key changes include the following:

- Adoption of the federal policy definition of research misconduct
- Designation of two distinct, non-overlapping officials at each location and separation of processes; one official makes the final determination of research misconduct, and a separate official handles imposing sanctions or discipline
- Inclusion of the Vice President of Agriculture and Natural Resources alongside Chancellors and Laboratory Directors as responsible for policy implementation.
- Campuses are allowed to develop different policies and procedures to address allegations of research misconduct that arise in the context of non-federally-funded research.
- Campuses should provide researchers access to education and training on integrity in research to promote an ethical environment and encourage reporting of potential misconduct.

Overall, CORCL observed that the proposed policy is reasonable. The Council offers the following specific comments:

- The establishment of two distinct, non-overlapping officials is a sensible separation of powers for determining misconduct, as is separating the processes.
- Regarding the provision that campuses may develop different policies and procedures to address allegations of research misconduct that arise in the context of non-federally-funded research, the Council recommended that such policies must be coordinated and disambiguated. There should be clear guidelines for which set of policies should be implemented if there are both federal and non-federal sources involved (and if there is a conflict).
- Training on research integrity should be streamlined. Current online modules should be updated as opposed to burdening faculty with an additional new module.

The Council appreciates the opportunity to comment.

On behalf of the Council,

A handwritten signature in black ink, appearing to read "Mike Fortun". The signature is fluid and cursive, with a rectangular border around the text area.

Mike Fortun, Chair



October 20, 2025

**Jane Stoever, Chair
Academic Senate, Irvine Division**

Re: Proposed Presidential Policy on Responding to Allegations of Research Misconduct

The Committee on Privilege and Tenure (CPT) discussed the proposed Presidential Policy on Responding to Allegations of Research Misconduct to replace the current University Policy on Integrity in Research (UIPR) at its meeting on September 30, 2025.

Overall, members felt the proposed policy was reasonable. However, some members noted the removal of language from UIPR that addressed what does *not* constitute research misconduct as well as a statement of principles about the rights to due process and confidentiality afforded to researchers accused of research misconduct and those who report it. While the committee understands that the proposed policy avoids duplicating the [Federal Policy](#), which includes definitions of research misconduct and clarification regarding honest error or differences of opinion, as well as safeguards for subjects of allegations and confidentiality, members felt it may be important for the university to reaffirm them in its own policy.

Members also reiterated that any local guidelines and procedures for implementing the proposed policy must be clearly described and available to faculty.

The committee appreciates the opportunity to comment.

Sincerely,



Alexander Ihler, Chair
Committee on Privilege and Tenure

Cc: Lisa Grant Ludwig, Chair Elect-Secretary
Jisoo Kim, Executive Director
Gina Anzivino, Associate Director & CPT Analyst



UCLA Academic Senate

Executive Board

December 8, 2025

Ahmet Palazoglu
Chair, UC Systemwide Academic Senate

Re: (Systemwide Senate Review) Proposed Presidential Policy on Responding to Allegations of Research Misconduct

Dear Chair Palazoglu,

The UCLA divisional Executive Board (EB) reviewed the proposed presidential policy on responding to allegations of research misconduct and the committee/council feedback at their meeting on December 4, 2025. EB members agreed to share the comments from the divisional councils and committees for systemwide consideration.

A couple of EB members disagreed with the concern in the Committee on Academic Freedom letter that the proposed policy adds to faculty research supervision duties. Instead, they found it was a good clarification of those duties.

Sincerely,



Megan McEvoy
Chair, UCLA Academic Senate

Encl.

Cc: Kathy Bawn, Immediate Past Chair, UCLA Academic Senate
April de Stefano, Executive Director, UCLA Academic Senate
Tim Groeling, Vice Chair/Chair Elect, UCLA Academic Senate

UCLA Academic Senate

Committee on Academic Freedom

November 26, 2025

To: Megan McEvoy, Chair
UCLA Academic Senate

Re: (Systemwide Senate Review) Proposed Presidential Policy on Responding to Allegations of Research Misconduct

Dear Chair McEvoy,

The Committee on Academic Freedom (CAF) discussed the proposed Presidential Policy on Responding to Allegations of Research Misconduct at its meeting on November 14, 2025. Members shared the following comments.

Members noted that revisions to the policy do not clarify the appointment process for the positions of the Research Integrity Officer and Deciding Officials. They recommend that the new role of Deciding Officials be filled by Senate faculty members who have expertise and direct experience with research and not by administrators who may not hold this same expertise.

One member pointed out a revision to the policy that appears to substantially add to the responsibilities of faculty researchers and research supervisors. Previously, the policy stated that faculty and those who supervise research have a “responsibility to create an environment which encourages those high standards and integrity in research” (pg. 3). The previously mentioned high standards were those of “intellectual honesty.” The proposed revision moves the sentence about research supervisors’ responsibilities to the end of this section (“Those who supervise research have a responsibility to maintain an environment that encourages these high standards,” pg. 3-4). With the new placement of the sentence, the “high standards” that are referred to encompass new, expanded responsibilities. These duties include:

Open publication and discussion, emphasis on quality of research, appropriate supervision, maintenance of accurate and detailed research procedures and results, and suitable assignment of credit and responsibility for research and publications are essential for fostering intellectual honesty and integrity in research (pg. 3).

Members recommend that this proposed revision be reconsidered. It not only changes the responsibilities of research supervisors but appears to expand potential avenues for research misconduct allegations.

The committee appreciates the opportunity to comment on this policy. If you have any questions, please contact me at haselton@ucla.edu or via the Committee’s analyst, Tara Hottman at thottman@senate.ucla.edu.

Sincerely,

Martie Haselton, Chair
Committee on Academic Freedom

cc: April de Stefano, Executive Director, Academic Senate
Tara Hottman, Senior Policy Analyst, Academic Senate
Kathy Bawn, Immediate Past Chair, Academic Senate
Tim Groeling, Vice Chair/Chair-Elect, Academic Senate
Committee on Academic Freedom Members

November 24, 2025

Megan McEvoy, Chair
Academic Senate

Re: Systemwide Senate Review: Proposed Presidential Policy on Responding to Allegations of Research Misconduct

Dear Chair McEvoy,

The Council on Research (COR) reviewed and discussed the Proposed Presidential Policy on Responding to Allegations of Research Misconduct. COR members shared the following comments.

Members expressed unanimous agreement with the revisions to the policy. Additionally, members offered a comment about confidentiality and the need for there to be no retribution toward any person bringing a complaint.

Thank you for the opportunity to review and comment. If you have any questions for us, please do not hesitate to contact me at shlyakht@ipam.ucla.edu or via the Council's analyst, Elizabeth Feller, at efeller@senate.ucla.edu.

Sincerely,

Dimitri Shlyakhtenko, Chair
Council on Research

cc: Tim Groeling, Vice Chair/Chair-Elect, Academic Senate
Kathleen Bawn, Immediate Past Chair, Academic Senate
April de Stefano, Executive Director, Academic Senate
Elizabeth Feller, Associate Director, Academic Senate
Members of the Council on Research

3125 Murphy Hall
410 Charles E. Young Drive East
Los Angeles, California 90095

November 19, 2025

To: Megan McEvoy, Chair, Academic Senate

From: Dorota Dabrowska, Chair, Graduate Council

Re: (Systemwide Senate Review) Proposed Presidential Policy on Responding to Allegations of Research Misconduct

At its meeting on November 14, 2025, the Graduate Council discussed the proposed *Presidential Policy on Responding to Allegations of Research Misconduct*. Members offered the following comments for consideration.

Some members shared similar concerns with the College Faculty Executive Committee about the term "allegations" in the revised policy name and suggested reverting to the previous title or adopting a more general name such as "policy on research misconduct."

We appreciate the opportunity to express our views on this matter. If you have any questions, please contact us via Graduate Council Analyst, Emily Le, at ele@senate.ucla.edu.

UCLA MEMORANDUM

FACULTY EXECUTIVE COMMITTEE
College of Letters and Science

A265 Murphy Hall
Box 951571
Los Angeles, California 90095

To: Megan McEvoy, Chair, Academic Senate, UCLA
Fr: Erin Debenport, Chair, College Faculty Executive Committee
Date: November 3, 2025
Re: **Response to the (Systemwide Senate Review) Proposed Presidential Policy on Responding to Allegations of Research Misconduct**

The College Faculty Executive Committee (FEC) at UCLA appreciates the opportunity to comment on the Proposed Presidential Policy on Responding to Allegations of Research Misconduct. After a review of the report by committee members, we offer the following comments.

The committee agrees with the substance of the policy changes and the necessity of updating the out-of-date policy. Members appreciated the efforts to align the policy with federal regulations and the addition of necessary specificity and definitions.

The committee did have some concern around the new title, *Responding to Allegations of Research Misconduct*. At first glance, the title is jarring as it draws negative connotations from “misconduct” and “allegations.” The previous title, Policy on Integrity in Research, sent a proactive, positive message about values, while the proposed title seems reactive and focused on enforcement.

As always, our membership appreciates the consultative process and welcomes the opportunity to participate in the discussion of important matters like this. You are welcome to contact us with questions.

The College Faculty Executive Committee



ACADEMIC SENATE, MERCED DIVISION
Kevin Mitchell, Chair, Merced Division of the Academic Senate

UNIVERSITY OF CALIFORNIA, MERCED

November 25, 2025

To: Ahmet Palazoglu, Chair, Academic Council

From: Kevin Mitchell, Chair, Divisional Council (DivCo)

Re: Presidential Policy on Responding to Allegations of Research Misconduct

The proposed revisions to the Presidential Policy on Responding to Allegations of Research Misconduct were circulated to the Merced Division Senate Committees and School Executive Committees for review. The committees listed below provided thoughtful feedback and raised points for consideration. Their comments are appended to this memo.

- Committee on Academic Freedom (CAF)
- Committee on Research (CoR)
- Committee on Rules and Elections (CRE)
- Committee for Equity, Diversity and Inclusion (EDI)
- Privilege and Tenure (P&T)
- School of Natural Sciences Executive Committee (NSEC)

On November 19, DivCo members discussed both the proposed policy and the committees' feedback. The summary below reflects the key themes that emerged from DivCo's deliberations as well as major perspectives offered by the committees.

DivCo members observed that the revised policy introduces language assigning principal investigators (PIs) primary responsibility for scientific integrity and project management – an addition not present in the previous policy. While this expectation was generally viewed as reasonable, concerns remain that the language could expose PIs to unwarranted liability in cases involving unintentional errors or misconduct by students or staff acting independently or without the PI's knowledge. Members emphasized the need to distinguish clearly between inadequate oversight, which falls within a PI's control, and misconduct committed by others, for which the PI should not bear full responsibility.

Members further underscored that the institution must also retain responsibility when systematic issues create compliance challenges beyond a PI's control, such as insufficient waste-disposal infrastructure or shifts in regulatory burden like the transition to PI-held DEA licenses. They also noted that individuals bear responsibility for their own actions and that PIs often must rely on extensive documentation of expectations and training to demonstrate adequate oversight. Ensuring alignment with related policies, such as APM-015 and whistleblower procedures, was also identified as important.

Committee Comments

Across committees, there is broad agreement that the proposed revisions represent an important and largely positive modernization of UC's framework for addressing research integrity issues. Committees commend the policy's improved clarity, alignment with updated federal standards, and structural coherence. While overall support is strong, several overarching concerns were raised.

Committees stress the importance of protecting academic freedom and maintaining political neutrality (CAF, NSEC), cautioning against mechanisms that could inadvertently expose UC researchers to politically motivated inquiries. They also emphasize UC's responsibility to sustain a broader culture of research integrity (CoR, CAF, NSEC), warning against a narrow focus on misconduct response at the expense of proactive institutional support.

Committees additionally call for greater clarity, consistency, and fairness in local implementation and enforcement (EDI, P&T, CoR), urging the development of transparent procedures and safeguards to ensure consistent application across locations.

Finally, CRE highlights a forward-looking concern: the absence of any reference to the use of artificial intelligence (AI). Given AI's growing role in research and its potential implications for research ethics and misconduct, CRE recommends that the University of California clarify whether AI-related issues are addressed in another policy or under active systemwide review.

Collectively, the committees urge that the final policy should balance federal compliance requirements with UC's long-standing commitments to academic freedom, institutional accountability, and research excellence.

We thank you for the opportunity to review this proposal.

Cc:

DivCo Members

CAF Chair

P&T Chair

School Executive Committee Chairs

UCM Senate Office

UCOP Senate Office



ACADEMIC SENATE, MERCED DIVISION
COMMITTEE ON ACADEMIC FREEDOM (CAF)

UNIVERSITY OF CALIFORNIA, MERCED
5200 NORTH LAKE ROAD
MERCED, CA 95343

November 7, 2025

To: Kevin Mitchell, Chair, Divisional Council

From: Committee on Academic Freedom (CAF)

Re: Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy)

At their October 22, 2025 meeting, members of the Committee on Academic Freedom (CAF) reviewed the *Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy)* and offer the following comments:

CAF recognizes that much of the revisions appear to reflect compliance with updated U.S. Department of Health policies as of January 1, 2025, rather than responding to policies or actions from the Trump administration. The revisions clarify procedural elements, such as designating Research Integrity Officers on each campus to handle allegations of research misconduct.

A notable addition to the policy is language emphasizing that principal investigators (PIs) hold primary responsibility for the scientific integrity and management of their research projects, including adherence to institutional and U.S. government policies on research misconduct. This raises questions regarding accountability, specifically whether responsibility for research misconduct is placed primarily on individual PIs rather than on the institution as a whole. We find this concerning and would like the policy to acknowledge that the institution bears some responsibility for research integrity, and that faculty will be supported in the case of spurious or politically-motivated accusations.

The recent revision also importantly adds language stating that “*All members of the UC research community are expected to cooperate in reporting suspected research misconduct and in responding to allegations by acting in good faith, providing research records and other relevant information to Research Integrity Officers...*” (page 3).

Given the politicization of research during the Trump administration, CAF believes that this aspect of the policy raises significant concerns. Specifically, there is a risk of spurious or politically motivated government investigations targeting UC faculty and researchers.

Overall, the changes were considered reasonable and consistent with institutional standards; however, CAF seeks clarification on the following points:

1. CAF seeks clarification on what guardrails will be established to protect UC faculty from investigations that target researchers who have criticized U.S. government leaders or

published scientific research that contradicts statements or policies promoted by government officials.

2. CAF seeks clarification on what measures will be taken to ensure that faculty are not required to assist potentially politically motivated investigations into their colleagues.
3. CAF seeks clarification on whether this policy was only recently revised on January 1, 2025. If so, what is the rationale for revising it again so shortly after the previous update?

CAF appreciates clarification on these points to ensure that the policy maintains research integrity while protecting faculty from undue risk or involvement in politically influenced investigations.

CAF thanks you for the opportunity to review and comment on the *Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy)*.

Cc: CAF Members
 Senate Office

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ACADEMIC SENATE, MERCED DIVISION
COMMITTEE ON RESEARCH (COR)
RAMEN SAHA, CHAIR
rsaha@ucmerced.edu

UNIVERSITY OF CALIFORNIA, MERCED
5200 NORTH LAKE ROAD
MERCED, CA 95343

November 7, 2025

To: Kevin Mitchell, Senate Chair

From: Ramen Saha, Chair, Committee on Research (CoR)

Re: Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy)

CoR reviewed the Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy). We offer the following comments.

In reviewing the draft policy, CoR noted that the draft policy represents an extensive revision and update of the current policy entitled University Policy on Integrity in Research, and not only updates policy content, but has also been renamed as “University of California Policy, Responding to Allegations of Research Misconduct”. Accordingly, the updates are comprehensive and represents a substantive shift from a focus on integrity itself, which covers and encompasses a broad range of issues, of which responding to allegations of research is a small, albeit important, component. This shift is illustrated by the scope of the policy stated on the draft policy title page: “This Policy applies to all research conducted under the auspices of any University of California (UC) Location by a person who, at the time of the alleged research misconduct, was affiliated with UC, including but not limited to faculty and other academic appointees.”

However, the importance of integrity more broadly is acknowledged in a key statement in the draft policy Introduction: “UC is committed to maintaining the integrity of scholarship and research, responding to allegations of research misconduct, and to fostering a climate conducive to research integrity in accordance with the UC Statement of Ethical Values. Such integrity includes not only Integrity in research includes not just the avoidance of wrongdoing, but also the rigor, carefulness, and accountability that are hallmarks of good scholarship”. But the shift in focus, label, and content toward responding to allegations of misconduct reflects our major concern with this draft. The UC seems to be unduly focused on research misconduct alone, and how to deal with members of the university accused of misconduct, and does not place sufficient emphasis on policies purposed to develop good practices related to integrity and strategies to minimize forms of misconduct, whether it is deliberate or due to negligence, among the UC research community.

As the introductory statement above indicates, the draft policy explicitly contextualizes the policy with respect to broad issues around research integrity, which, not only seems to be at loggerheads with the content of the policy, but mischaracterizes it, reduces current emphasis on good research integrity practices and developing a culture of research integrity in at the UCs. It also sends an implicit message that the UC seems to unduly focus

on allegations of research misconduct itself rather than research integrity more broadly and the aforementioned issues about developing a culture of research integrity within the University and raising awareness of, and prevention of, issues about research misconduct.

CoR suggests that the key issue is, therefore, whether the UC will no longer have a broader policy on research integrity, particularly issues around development of a research culture, and promoting and preserving research integrity at all levels, and associated policies and educational principles that should be applied in all contexts where research is conducted. Or, will there be another new accompanying policy which is focused on these broader integrity issues? This has not been made clear. This observation does not mean that research misconduct does not deserve particular focus in a separate policy, and it seems that standalone research misconduct and integrity might be appropriate as they would maximize clarity and focus on these issues and would be considered and work in tandem. Rather, it seems broader issues about research integrity are no longer reified in UC policy if omission of content making reference to broader integrity issues from the previous policy is retained in the current policy draft.

Finally, most prominent cases of research misconduct among University researchers, and those considered most serious (e.g., those relating to fabricating data, publication fraud such as citation cartels), as well as those that are less prominent regardless of level of seriousness, have been identified or flagged by whistleblowers from within the labs or research groups of those accused of, and ultimately proven to be, engaged in misconduct. The policy makes no reference to the whistleblowers as sources of identifying research integrity. Broadly, whistleblowing is central to identification of unethical conduct and the contravention of laws and regulations in multiple contexts and fields and at all levels, and many organizations have policies with respect to whistleblower identification, treatment, protection, and anonymity preservation. CoR notes that the UC has a general policy on whistleblowers (University of California – Whistleblower Policy, <https://policy.ucop.edu/doc/1100171/Whistleblower>), which is consistent and compliant with the California Whistleblower Protection Act (CA Government Code Section 8547- 8547.12). However, the draft policy misses the opportunity to make clear the important role that whistleblowers have in research conduct identification and does not make explicit that the University of California – Whistleblower Policy applies in cases of research misconduct identified by (a) whistleblower(s). So, given that whistleblowers have been central to research misconduct identification, CoR believes that it would be important that the draft policy highlight this prominent role and make clear how the UC policy on responding to accusations of misconduct treats whistleblowers, particularly in the contexts of the UC Whistleblower Policy.

Finally, CoR understands that these proposed amendments to the Presidential policy are partially in response to changes in Federal policies regarding research and therefore there is a need for the policy to have the specific focus it does. However, we strongly recommend that it would be preferable to formulate a broader research integrity policy that is part of, or is complementary to, this proposed amended Presidential policy.

We appreciate the opportunity to opine.

cc: Senate Office

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ACADEMIC SENATE, MERCED DIVISION
COMMITTEE ON RULES AND ELECTIONS (CRE)

UNIVERSITY OF CALIFORNIA, MERCED

November 4, 2025

To: Kevin Mitchell, Chair, Divisional Council
From: Committee on Rules and Elections (CRE)
Re: [Presidential Policy on Responding to Allegations of Research Misconduct \(UC Research Misconduct Policy\)](#)

The Committee on Rules and Elections (CRE) reviewed the proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy) and offers the following comments.

This proposal updates the current [University Policy on Integrity in Research](#). The key revisions include: publication in the correct format for UC Presidential Policies, adoption of definitions related to research misconduct provided in the [Federal Public Health Service Policies on Research Misconduct](#), restatement that the UC is committed to maintaining the integrity of scholarship and research, responding to allegations of research misconduct, and to fostering a climate conducive to research integrity in accordance with the UC Statement of Ethical Values, and a “Procedures” Section that directs Locations to implement local policies and procedures for responding to allegations of research misconduct, including complying with federal policies and conditions of extramural awards.

CRE sees no issues of consistency or clarity in relation to the updates; however, CRE notes that there is no mention of the use of AI, which is a prominent and increasingly important area of research ethics and research misconduct and therefore should be addressed. If the issue is handled by another policy or if changes are pending the results of a working group of some kind, then this should be noted somewhere.

We thank you for the opportunity to review and comment.

CC: CRE Members
Senate Office



ACADEMIC SENATE, MERCED DIVISION
COMMITTEE FOR EQUITY, DIVERSITY AND INCLUSION (EDI)

UNIVERSITY OF CALIFORNIA, MERCED

November 6, 2025

To: Kevin Mitchell, Chair, Divisional Council (DivCo)

From: Sean Malloy, Chair, Committee for Equity, Diversity and Inclusion (EDI)

Re: [Presidential Policy on Responding to Allegations of Research Misconduct \(UC Research Misconduct Policy\)](#)

The Committee for Equity, Diversity and Inclusion (EDI) reviewed the Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy) and offers the following comments.

The proposed policy clarifies language, adopts definitions, establishes the role of the Deciding Official, and directs Locations to comply with federal policies and conditions of extramural awards. EDI finds these to be positive additions, and we appreciate the work done to update the policy. Section V. Procedures (pages 3-4 of the policy) directs Locations to develop and establish their own local policies and procedures. While this is acceptable, a helpful addition to the text may be to highlight the important components of such local policies and procedures that should be included to ensure best practices. Such points might include:

- Procedures for assessment, inquiry, investigation, and Office of Research Integrity (ORI) cooperation
- Procedures for conflict-of-interest management and safeguards against retaliation
- Standards of proof and burden of proof
- Procedure for appointing the Deciding Official
- Timeline of investigations

We thank you for the opportunity to review and comment.

Cc: EDI Members
Senate Office

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ACADEMIC SENATE, MERCED DIVISION
Christopher Viney, Chair, Committee on Privilege and Tenure

UNIVERSITY OF CALIFORNIA, MERCED

October 29, 2025

To: Kevin Mitchell, Chair, Divisional Council

From: Christopher Viney, Chair, Committee on Privilege and Tenure (P&T)

Re: Presidential Policy on Responding to Allegations of Research Misconduct

Members of P&T have reviewed the **Presidential Policy on Responding to Allegations of Research Misconduct**. Overall, the committee finds the revisions to be substantial improvements – comprehensive, well-structured, and consistent throughout.

However, the subsection title “Other research-related University policies that may overlap with this Policy” is problematic. If a policy overlaps, it deserves a mention here. If it does not overlap, it does not deserve a mention here. By including “may” in the subsection title, it opens a gray area for the administration to expand disciplinary charges against a faculty member.

We have no additional substantive comments, but we recommend that the currently empty FAQ section include information on how to access or search for (suitably redacted) previous research misconduct cases within the UC system.

Thank you for the opportunity to offer comments on these proposed revisions to this policy.

Cc: P&T Members

From: [Jennifer Manilay](#)
To: [Fatima Paul](#); [ucm senatechair](#)
Cc: [Michael Dawson](#); [Susan DeRiemer](#); [Tao Ye](#); [Mayya Tokman](#); [Jay Sharping](#)
Subject: RE: [Systemwide Review Item] Presidential Policy on Responding to Allegations of Research Misconduct (Due by 11/07/25)
Date: Thursday, November 6, 2025 4:26:19 PM

Dear Fatima and Kevin:

SNSEC thanks you for the opportunity to review the draft of this policy.

At face value, the draft policy's language is appropriate and consistent with UC Merced's established research integrity policies (see: <https://rci.ucmerced.edu/research-misconduct>). The primary concern arises from its reference to the recent White House Executive Order on "*Gold Standard Science*," which may unintentionally lend that document undue credibility.

The executive order includes assertions that reflect misunderstandings of, or misrepresentations about, the current state of U.S. scientific research. For example, it claims that a "majority of researchers in science, technology, engineering, and mathematics believe science is facing a reproducibility crisis," and that the Administration seeks "to ensure that federally funded research ... [is] informed by the most credible, reliable, and impartial scientific evidence available." These statements do not accurately characterize contemporary scientific practice and risk conveying an unwarranted critique of the scientific community.

While the drafters of the UC policy revisions may view reference to the executive order as necessary or prudent, such a reference is not required. The UC Presidential Policy can be revised in a manner that incorporates any needed updates while continuing to uphold the University's long-standing best practices, avoiding direct or indirect endorsement of a politically oriented and biased document, and affirming the traditions, standards, and integrity of the UC research community.

Sincerely,

Jennifer O. Manilay, PhD
Professor, Dept. of Molecular and Cell Biology
Chair, Natural Sciences Executive Committee AY-25-26
School of Natural Sciences
University of California, Merced
jmanilay@ucmerced.edu

Pronouns: she/her/hers



CHAIR, ACADEMIC SENATE
RIVERSIDE DIVISION
UNIVERSITY OFFICE BUILDING, RM 225

Kenneth Barish
PROFESSOR OF PHYSICS AND ASTRONOMY
RIVERSIDE, CA 92521-0217
TEL: (951) 827-5023
EMAIL: kenneth.barish@ucr.edu

December 9, 2025

Ahmet Palazoglu, Chair, Academic Council
1111 Franklin Street, 12th Floor
Oakland, CA 94607-5200

RE: Proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy)

Dear Ahmet,

On December 8, 2025 the Riverside Academic Senate Executive Council discussed the *Proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy)* along with comments received from divisional committees. These are attached for your reference; and the Council had no comments to add to those submitted from the review.

The CNAS faculty executive committee: Did not object to moving forward with the proposed policy. However, the committee requested that the following resources, included in section VI. Related Information/Resources of the proposed policy, be removed from the final policy completely:

- Executive Order, Restoring Gold Standard Science (May 23, 2025)
- OSTP, Agency Guidance for Implementing Gold Standard Science in the Conduct & Management of Scientific Activities (Jun. 23, 2025)

The committee does not agree with the content of these documents and does not agree with the outlined “Gold Standard” within the communications. As executive orders can be changed, the committee does not feel that this should be taken into consideration in the development of this policy and should not be referenced.

The Committee on Privilege and Tenure: Transmitted areas of concern and made recommendations for both. The policy states that everyone on campus is responsible for research integrity. The scope includes “appointees, staff, students, postdoctoral scholars, and visiting scholars.” The policy which follows, as written, specifically mentions principal investigators but not others. When reading the policy it does not appear inclusive of all those conducting or participating in research. The committee recommends adding language which makes the responsibilities of all more explicit. The language defining research integrity (Section III, Policy Text - p. 3 of 8 in the marked copy) is underdeveloped. This proposed revision calls for research which meets “the highest standard of honesty, accuracy, and objectivity.” The term objectivity has been wielded to mask subjective, political aims in direct conflict with what the data shows (e.g. the normalization of vaccine hesitation, or in racist/sexist pseudoscience). Instead of using the word “objective,” the standard today is to use language which concretizes integrity in research

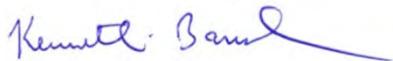
practice by naming what objective means, in practice. The original language (cut in favor of the word “objectivity”) was more useful. The committee recommends revising or reverting to the previous text.

The Graduate Council: Conveyed that the criterion “objectivity” should be defined.

The Committee on Charges supports the draft changes and views the changes as a straightforward update to long-standing policy with uncontroversial changes in practice. Charges appreciates the clear definition of research misconduct, and notes. there is a missed opportunity to better clarify research misconduct in the context of PI and lab member actions.

The School of Medicine faculty executive committee: Mentioned their approval of a proposal to update regulations to align with HHS requirements from September last year, which includes setting specific deadlines for actions.

Sincerely yours,



Kenneth Barish
Professor of Physics and Astronomy and Chair of the Riverside Division

Encl.

CC: Monica Lin, Executive Director of the Academic Senate
Cherysa Cortez, Executive Director of UCR Academic Senate Office



Academic Senate

COMMITTEE ON CHARGES

November 21, 2025

To: Kenneth Barish, Chair
Riverside Division

Fr: Darrel Jenerette
Chair, Committee on Charges

Re: [Systemwide Review] Proposal: Proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy)

The Committee on Charges supports the draft changes. We view the changes as a straightforward update to long-standing policy with uncontroversial changes in practice. We appreciate the clear definition of research misconduct. We note there is a missed opportunity to better clarify research misconduct in the context of PI and lab member actions.



College of Humanities, Arts, and
Social Sciences
EXECUTIVE COMMITTEE

October 30, 2025

TO: Ken Barish, Chair
Riverside Division of the Academic Senate

FROM: Iván Aguirre, Interim Chair
CHASS Executive Committee

RE: [Systemwide Review] Proposal: Proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy)

The CHASS Executive Committee reviewed the Proposal: Proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy). The committee supports the proposed revised policy.

November 21st, 2025

TO: Kenneth N. Barish, Chair, Academic Senate, UCR Division

FROM: Harry Tom, Chair, Faculty Executive Committee, College of Natural and Agricultural Sciences

SUBJECT: [Systemwide Review] Proposal: Proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy)

Prof. Barish,

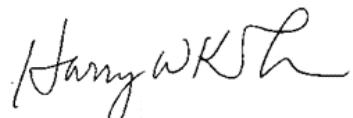
The CNAS Faculty Executive Committee has reviewed the proposal for the presidential policy on responding to research misconduct at their November 18th meeting and had comments to provide to the Senate.

The committee does not object to moving forward with the proposed policy. However, the committee would like to request that the following resources, included in section VI. Related Information/Resources of the proposed policy, be removed from the final policy completely:

- Executive Order, Restoring Gold Standard Science (May 23, 2025)
- OSTP, Agency Guidance for Implementing Gold Standard Science in the Conduct & Management of Scientific Activities (Jun. 23, 2025)

The committee does not agree with the content of these documents and does not agree with the outlined “Gold Standard” within the communications. As executive orders can be changed, the committee does not feel that this should be taken into consideration in the development of this policy and should not be referenced.

Sincerely,



Harry Tom, Ph.D
Chair, Faculty Executive Committee, College of Natural and Agricultural Sciences



Academic Senate

COMMITTEE ON FACULTY WELFARE

November 20, 2025

To: Kenneth Barish, Chair
Riverside Division Academic Senate

A handwritten signature in black ink that reads 'M. Salman Asif'.

From: Salman Asif, Chair
Committee on Faculty Welfare

Re: [Systemwide Review] Proposal: *Proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy)*

The Committee on Faculty Welfare (CFW) reviewed the *Proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy)*. CFW generally supports the proposed policy and has no comments.



Academic Senate

GRADUATE COUNCIL

November 20, 2025

To: Kenneth Barish, Chair
Riverside Division

From: Viji Santhakumar, Chair
Graduate Council

RE: [Systemwide Review] (Proposal) Proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy)

Graduate Council reviewed the proposed revisions to the Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy) at their November 20, 2025 meeting. The Council felt that the criterion “objectivity” should be defined.



Academic Senate

COMMITTEE ON PRIVILEGE & TENURE

December 1, 2025

To: Kenneth Barish, Chair
Riverside Division

Fr: Jennifer Doyle
Chair, Committee on Privilege & Tenure

Re: [Systemwide Review] Proposal: Proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy)

The Committee on Privilege and Tenure has reviewed the Proposed University of California Presidential Policy on Responding to Allegations of Research Misconduct distributed for review on 9/25/25.

We have areas of concern and make recommendations for both.

The policy states that everyone on campus is responsible for research integrity. The scope includes “appointees, staff, students, postdoctoral scholars, and visiting scholars.” The policy which follows, as written, specifically mentions principal investigators but not others. When reading the policy it does not appear inclusive of all those conducting or participating in research. We thus recommend adding language which makes the responsibilities of all more explicit.

The language defining research integrity (Section III, Policy Text - p. 3 of 8 in the marked copy) is underdeveloped. This proposed revision calls for research which meets “the highest standards of honesty, accuracy, and objectivity.” The term objectivity has been wielded to mask subjective, political aims in direct conflict with what the data shows (e.g. the normalization of vaccine hesitation, or in racist/sexist pseudoscience). Instead of using the word “objective,” the standard today is to use language which concretizes integrity in research practice by naming what objective means, in practice. The original language (cut in favor of the word “objectivity”) was more useful. We recommend revising or reverting to the previous text.



November 12, 2025

TO: Ken Barish, PhD, Chair, Academic Senate, UCR Division

FROM: Adam Godzik, Ph.D., Chair, Faculty Executive Committee, UCR School of Medicine

SUBJECT: **[Systemwide Review] Proposal: *Proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy)***

Dear Ken,

The SOM Faculty Executive Committee has reviewed the Proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy).

The FEC approved a proposal to update regulations to align with HHS requirements from September last year, which includes setting specific deadlines for actions.

Yours sincerely,

DocuSigned by:


Adam Godzik, Ph.D.
Chair, Faculty Executive Committee School of Medicine



OFFICE OF THE ACADEMIC SENATE

9500 GILMAN DRIVE
LA JOLLA, CALIFORNIA 92093-0002
TELEPHONE: (858) 534-3640
FAX: (858) 534-4528

November 10, 2025

Professor Ahmet Palazoglu
Chair, Academic Senate
University of California
VIA EMAIL

Re: Divisional Review of Proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy)

Dear Chair Palazoglu,

The proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy) was distributed to San Diego Divisional Senate standing committees and discussed at the November 3, 2025 Divisional Senate Council meeting. Senate Council offered the following comments for consideration.

Reviewers had no objections to the revisions but were concerned about basing UC policies on external federal regulations that may change, particularly given today's political environment and recent scrutiny on certain research subjects and grants. It was also noted that it would be reasonable for this policy to include NAGPRA violations, as they are considered as a type of research misconduct.

The responses from the Divisional Committee on Faculty Welfare, Committee on Privilege and Tenure, and Committee on Research are attached.

Sincerely,

A handwritten signature in cursive script that reads "Rebecca Jo Plant".

Rebecca Jo Plant
Chair
San Diego Divisional Academic Senate

Attachment

cc: Akos Rona-Tas, Vice Chair, San Diego Divisional Academic Senate
Lori Hullings, Executive Director, San Diego Divisional Academic Senate
Monica Lin, Executive Director, UC Systemwide Academic Senate

October 23, 2025

PROFESSOR REBECCA JO PLANT, Chair
Academic Senate, San Diego Division

SUBJECT: Review of UC Research Misconduct Policy

Dear Chair Plant,

At its October 15, 2025 meeting, the Committee on Faculty Welfare (CFW) reviewed the proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy). The Committee had no objections to the proposed revisions and had no additional comments.

Sincerely,

Amy Adler
Chair
Committee on Faculty Welfare

cc: Akos Rona-Tas, Senate Vice Chair
Lori Hullings, Senate Executive Director
Jenna Coomer, Senior Senate Analyst
Jeffrey Clemens, Vice Chair, Committee on Faculty Welfare

October 24, 2025

PROFESSOR REBECCA JO PLANT, Chair
Academic Senate, San Diego Division

SUBJECT: Review of Proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy)

Dear Chair Plant,

At its October 9, 2025 meeting, the Committee on Privilege and Tenure (CPT) reviewed the proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy).

CPT did not oppose the proposed policy, but the committee expressed reservations about basing UC policies on external Federal regulations that may change, particularly given today's political environment. Specifically, Section II (Definitions) relies on definitions provided in a potentially variable Federal Policy. Such reliance could inadvertently subject the university to violations of rules that did not exist when the policy was originally adopted. To mitigate future complications, the committee suggested adding a date reference (e.g., "as of [month day year]") to Section II so the university is not bound to a fluid definition of research misconduct from non-academic entities. Additionally, Section I states, "This Policy also intends to satisfy the research-misconduct requirements of the U.S. Department of Health and Human Services (DHHS) ('PHS Policies'), the National Science Foundation ('NSF Policy'), and other federal agencies." The committee questioned whether it is appropriate to use the vague phrase "other federal agencies" without further specification.

Sincerely,

William McEneaney
Chair
Committee on Privilege and Tenure

cc: Akos Rona-Tas, Senate Vice Chair
Lori Hullings, Senate Executive Director
Jenna Coomer, Senior Senate Analyst
Jordan Crandall, Committee on Privilege and Tenure Vice Chair

October 21, 2025

REBECCA JO PLANT, Chair
Academic Senate, San Diego Division

SUBJECT: Review of Proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy)

The Committee on Research (COR) discussed the Proposed Presidential Policy on Responding to Allegations of Research Misconduct (UC Research Misconduct Policy) at their October 13, 2025 meeting. The Committee had no objections to the proposed policy, but offered the following comments for consideration:

1. The policy should include additional guidance on how issues will be resolved if multiple UCs are involved in the research.
2. Language should be included that clarifies that while it is a UC-wide policy, each campus should follow specific timelines and procedures to ensure there is alignment in how each campus responds to cases of research misconduct.
3. The Committee would appreciate the addition of the National Institutes of Health (NIH) to the list of resources at the end of the policy, as it is the Committee's understanding that it is common practice for the NIH to ask for the UC's response to misconduct cases.

Sincerely yours,

Ramesh Rao, Chair
Committee on Research

cc: J. Coomer
O. George
L. Hullings
A. Rona-Tas

Office of the Academic Senate
Wayne & Gladys Valley Center for Vision
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Errol Lobo, MD, PhD, Chair
Marta Margeta, MD, PhD, Vice Chair
Kartika Palar, PhD, MA, Secretary
Spencer Behr, MD, Parliamentarian

December 9, 2025

Ahmet Palazoglu
Chair, Academic Council
Systemwide Academic Senate
University of California Office of the President
1111 Franklin St., 12th Floor
Oakland, CA 94607-5200

Re: Systemwide Review of Proposed Presidential Policy on Responding to Allegations of Research Misconduct

Dear Chair Palazoglu:

The San Francisco Division of the Academic Senate is pleased to provide comments on the Systemwide Review of Proposed Presidential Policy on Responding to Allegations of Research Misconduct. We appreciate the policy's commitment to research integrity and the implementation of the Federal Policy on Research Misconduct from the Office of Science and Technology Policy (OSTP) as well as the requirements set out by the U.S. Department of Health and Human Services (DHHS), the National Science Foundation (NSF), and other agencies. Two committees responded to this review: the Committee on Research (COR) and the Committee on Rules and Jurisdiction (R&J):

1. **Policy scope:** COR has found that most of the policy focuses narrowly on research misconduct; however, **Section III (Policy Text)** discusses a much broader set of standards for research, e.g., "Open publication and discussion, emphasis on quality of research, and maintenance of accurate and detailed research procedures and results." Given this paradox, COR suggests either rewriting this section to focus exclusively on research misconduct or clearly labeling or describing these broader set of standards for research in the policy.
2. **Section V - Misconduct procedures & Multiple Standards and Rules:** The current language in **Section V (Procedures)** states, "Locations should consider describing the local mechanisms that will be used for the imposition of appropriate sanctions or discipline when the allegation of misconduct has been substantiated." COR suggests that the language should be made stronger (i.e., "*Locations must describe...*") as to ensure researchers understand how they will be sanctioned or disciplined in the case of substantiated research misconduct. Similarly, R&J is concerned about the many policies and procedures that might simultaneously exist to govern allegations of research misconduct under this policy. Given that each Location shall have its own policies and procedures, this increases the likelihood for a myriad of research misconduct policies – causing confusion and a complex system of multiple standards to navigate. While this may not be avoidable in a research environment with so many different funding sources, the potential for inconsistency and confusion remains.
3. **References to Faculty Discipline Policies:** R&J recommends that the policy be revised to include references to UC's policies on faculty discipline, specifically APM 016 and Senate Bylaw 336. R&J notes that the UC recently conducted a review of APM 015 and 016 with the aim to standardize and streamline the faculty discipline process. Thus, R&J recommends including references to faculty discipline policies in this misconduct policy as it would be helpful to connect related policies.

4. **Defined Terms:** Certain terms are defined in the proposed policy but are not included in the definitions section. R&J suggests adding terms, such as “Deciding Officials,” “Research Integrity Officers (RIOs),” and “Principal Investigators,” to the definitions section, so that all of the defined terms are in a single location.

Thank you for the opportunity to review this important policy. If you have any questions, please reach out to me or the UCSF Senate Executive Director, Todd Giedt (todd.giedt@ucsf.edu).

Sincerely,

Errol Lobo, MD, PhD, 2025-27 Chair
UCSF Academic Senate

Enclosures (2)

Cc: Melissa Medvedev, Chair, Committee on Research (COR)
Irfan Kathiriya, Chair, Committee on Rules and Jurisdiction (R&J)

Communication from the Committee on Research

Melissa Medvedev, MD, PhD, Chair, Committee on Research

December 3, 2025

TO: Errol Lobo, Chair of the UCSF Division of the Academic Senate

FROM: Melissa Medvedev, Chair, Committee on Research

CC: Todd Giedt, Executive Director of the UCSF Academic Senate Office

RE: Systemwide Senate Review of Proposed Presidential Policy on Responding to Allegations of Research Misconduct

Dear Chair Lobo:

The Committee on Research (COR) write to comment on the Systemwide Senate Review of the Proposed Presidential Policy on Responding to Allegations of Research Misconduct.

COR supports the development of this policy in alignment with federal research misconduct policies. COR values the University's commitment to integrity in research and feels that the expectations for researchers laid out in the policy are sound.

COR would like to make two recommendations:

1. Most of the policy focuses narrowly on research misconduct, defined as "fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results." However, **Section III (Policy Text)** discusses a much broader set of standards for research. Although standards like "Open publication and discussion, emphasis on quality of research, and maintenance of accurate and detailed research procedures and results" are reasonable to expect of UC researchers, a failure to meet these standards does not necessarily constitute research misconduct. As written, it is unclear whether the policy is conflating the expectations in Section III with research misconduct. COR recommends rewriting this section to focus exclusively on research misconduct. Alternatively, if these broader standards for research are to remain in the policy, they should be labeled or described as additional context for the policy, and the policy should clearly state that violations of these standards do not always meet the definition of research misconduct.
2. **Section V (Procedures)** currently states, "Locations should consider describing the local mechanisms that will be used for the imposition of appropriate sanctions or discipline when the allegation of misconduct has been substantiated." COR suggests that this wording be made stronger (i.e., "Locations *must* describe..."). It is important that researchers understand in advance how they will be sanctioned or disciplined in the case of substantiated research misconduct. COR feels it is reasonable to require that campuses develop clear disciplinary mechanisms and make the information available to researchers.

Thank you for the opportunity to comment on this important policy. If you have any questions on these comments, please contact me or Academic Senate Analyst Liz Greenwood (liz.greenwood@ucsf.edu).

Committee on Rules and Jurisdiction

Irfan Kathiriya, MD, PhD, Chair

December 10, 2025

Errol Lobo, MD, PhD
Division Chair
UCSF Academic Senate

Re: Systemwide Review of Proposed Presidential Policy on Responding to Allegations of Research Misconduct

Dear Chair Lobo:

The Committee on Rules and Jurisdiction (R&J) writes to comment on the [Systemwide Review of Proposed Presidential Policy on Responding to Allegations of Research Misconduct](#) that is out for review. After reviewing this policy, R&J had a few areas of concern.

Add References to Faculty Discipline Policies: R&J recommends that the policy be revised to include references to UC's policies on faculty discipline, specifically APM 016 and Senate Bylaw 336. The University of California (UC) recently conducted a systemwide review of proposed changes to APM 015 and 016. One of the goals of the proposed revisions was to standardize and streamline the faculty discipline process. As research misconduct could ultimately result in faculty discipline, R&J believes it would be helpful to include references to faculty discipline policies in the proposed research misconduct policy. This may, in a small way, help connect the related policies to each other and advance the goal of coordinating and streamlining processes.

Concern about Multiple Standards and Rules: R&J next writes to express concern about the many policies and procedures that might simultaneously exist to govern allegations of research misconduct under this policy. In Section V. on Procedures, the proposed policy states that each Location shall have its own policies and procedures. These local policies must comply with the conditions of the award, including applicable Federal regulations or policies. Then, different policies are permitted for non-federally-funded research, and different policies can also exist for non-extramurally funded research. While R&J appreciates the need and importance of complying with the requirements of funders, R&J is concerned about the potential for a myriad of research misconduct policies. Rather than creating one systemwide policy, this proposed policy seems to invite complexity and multiple standards. This may not be avoidable in a research environment with so many funding sources, but the potential for inconsistency and confusion concerns R&J.

Defined Terms: Finally, R&J notes that certain terms, such as "Deciding Officials," "Research Integrity Officers (RIOs)," and "Principal Investigators," are defined in the proposed policy but are not included in the definitions section. R&J suggests adding them to the definitions section, so that all of the defined terms are in a single location.

Please contact me or our committee analysts Sophia Root (sophia.root@ucsf.edu) and Kristie Tappan (kristie.tappan@ucsf.edu) if there are questions about R&J's comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Irfan Kathiriya".

Irfan Kathiriya, MD, PhD
Committee on Rules and Jurisdiction Chair

cc Todd Giedt, UCSF Academic Senate Executive Director
Kristie Tappan, UCSF Academic Senate Senior Public Policy Analyst
Sophia Bahar Root, UCSF Academic Senate Analyst



UC SANTA BARBARA

Academic Senate
Rita Raley, Chair
Shasta Delp, Executive Director

1233 Girvetz Hall
Santa Barbara, CA 93106-3050
<http://www.senate.ucsb.edu>

December 10, 2025

To: Ahmet Palazoglu, Chair
Academic Senate

From: Rita Raley, Divisional Chair
Academic Senate

A handwritten signature in black ink, appearing to read "Rita Raley".

Re: Proposed Presidential Policy on Responding to Allegations of Research Misconduct

The Santa Barbara Division distributed the Proposed Presidential Policy on Responding to Allegations of Research Misconduct to the Committee on Research and Policy and Procedures, (CRPP), the Committee on Academic Personnel (CAP), the Council on Faculty Welfare, Academic Freedom, and Awards (CFW), the Charges Advisory Committee (CAC), the Committee on Privilege and Tenure (P&T), the Graduate Council, and the Faculty Executive Committees (FECs) for the College of Letters and Science (L&S), the College of Engineering (COE), the College of Creative Studies (CCS), the Gevirtz Graduate School of Education (EDUC), and the Bren School of Environmental Science and Management (BREN). CAP, CAC, GC, and the L&S, CCS, and BREN FECs elected not to opine.

The attached committee responses include a key concern from P&T: the revised policy's shift away from defining research integrity (the central focus of the original document) risks leaving a critical gap in UC's framework for ethical research.

The committee proposes two remedies: (1) expand the preamble to explicitly define research integrity (with links to related policies); or (2) develop separate policies for research integrity principles and misconduct procedures. Additionally, the committee flags a procedural inconsistency. While recent revisions to APM 015/016 standardized timelines and outcomes for faculty discipline cases across campuses, the new research misconduct policy lacks similar systemwide alignment, which is necessary for ensuring equitable processes.

Academic Senate
Santa Barbara Division

December 2, 2025

To: Rita Raley, Divisional Chair
Academic Senate

From: David Valentine, Chair *David Valentine*
Committee on Research Policy and Procedures

Re: Proposed Presidential Policy on Responding to Allegations of Research Misconduct

At its meeting of November 14, 2025, the Committee on Research Policy and Procedures (CRPP) discussed the proposed revisions to Presidential Policy on Responding to Allegations of Research Misconduct. The committee discussed the UCSB Office of Research's (OR) progress on its local policy regarding research misconduct, as the proposed revisions are for implementation by January of 2026. OR will provide clarity in its pending updated policy on: what counts as affiliation to the university; whether UCSB's campus policy will extend beyond fabrication, falsification, and plagiarism; and if the updated policy pertains to conference presentations in addition to published works. OR expects to be able to meet the proposed updates of implementing local policies and procedures for responding to allegations, which will include providing education and training on research integrity and encouraging reporting of potential misconduct.

CC: Shasta Delp, Executive Director, Academic Senate

UNIVERSITY OF CALIFORNIA
ACADEMIC SENATE
SANTA BARBARA DIVISION
Council on Faculty Welfare, Academic Freedom & Awards

December 4, 2025

To: Rita Raley, Divisional Chair
Academic Senate

From: Matt Helgeson, Chair 
Council on Faculty Welfare, Academic Freedom and Awards

Re: Proposed Presidential Policy on Responding to Allegations of Research Misconduct

At its recent meeting on October 29, 2025, the Council on Faculty Welfare, Academic Freedom and Awards (CFW) discussed the Proposed Presidential Policy on Responding to Allegations of Research Misconduct. CFW endorses the policy, as it aligns UC policy with applicable state and federal laws.

In order to aid the broad dissemination and awareness of the policy, CFW recommends that a summary of its contents be incorporated into the UC Responsible Conduct of Research training.

CC: Shasta Delp, Executive Director, Academic Senate

UC SANTA BARBARA
Academic Senate

DATE: December 3, 2025

TO: Rita Raley, Divisional Chair
Academic Senate

FROM: Phil Christopher, Chair
Committee on Privilege and Tenure

RE: Proposed Presidential Policy on Responding to Allegations of Research Misconduct

On November 13th, the Committee on Privilege and Tenure (P&T) reviewed and discussed the *“Proposed Presidential Policy on Responding to Allegations of Research Misconduct”*. The discussion focused on two main issues: (1) the objective, focus and content of the policy and (2) consistency in policy across campuses.

The document being replaced was titled “University Policy on Integrity in Research”, focusing about half on defining integrity and misconduct in research (including links with further descriptions) and half on how allegations of misconduct would be addressed. The replacing document shifts focus in the title and content to almost completely remove discussions that define research integrity. The committee felt that this shift in focus could be addressed by either (a) adding an expanded preamble to the document that includes a longer definition of research integrity, including links to relevant policies, or (b) creating distinct policies on integrity in research and responding to allegations of research misconduct.

In relation to the procedures section where the document states, *“Each Location must implement policies and procedures for responding to allegations of research misconduct.”*, the committee discussed an apparent disconnect with a recent review of APM 015 and APM 016 revisions. Campuses just reviewed APM 015 and APM 016 revisions that were related to timelines, procedures and outcomes of faculty discipline cases (focused on expressive action misconduct) being consistent between campuses. In this regard, the development of consistency in responses to allegations of research misconduct between campuses is also encouraged.

CC: Shasta Delp, Executive Director, Academic Senate

November 4, 2025

TO: Rita Raley
Divisional Chair, Academic Senate

FROM: Dahlia Malkhi, Chair
College of Engineering, Faculty Executive Committee

RE: Proposed Presidential Policy on Responding to Allegations of Research Misconduct

Signed by:

Dahlia Malkhi
2D51752F8998416...

The College of Engineering FEC met on Tuesday, October 21st and Tuesday, November 4th and discussed the proposed policy.

The committee stated that the policy seems reasonable but they are lacking context and are, thus, unable to offer specific feedback or endorse the policy changes.

Specifically the committee asked the following questions:

- What motivated the changes and why now?
- What data exists to support the need for policy changes?
- Can concrete examples be provided of situations that this policy addresses that the old policy did not address?
- What does this policy imply with respect to future federal executive orders?

UC SANTA BARBARA

Faculty Executive Committee
Gevirtz Graduate School of Education

December 1, 2025

To: Rita Raley
Chair, Executive Council

From: Tim Dewar
Chair, Faculty Executive Committee, GGSE

Re: Proposed Presidential Policy on Responding to Allegations of Research Misconduct

To whom it may concern,

The FEC of the GGSE appreciates the work to establish a Presidential Policy on Responding to Allegations of Research Misconduct. While always necessary, such policies and procedures are especially valuable now when we find the integrity of the American university model being misrepresented and challenged. We note that this update was prompted by revisions from the Department of Health and Human Services in September, 2024.

DocuSigned by:

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Office of the Academic Senate
SANTA CRUZ DIVISION
125 CLARK KERR HALL
(831) 459 - 2086

December 9, 2025

AHMET PALAZOGLU
Chair, Academic Council

RE: Proposed Presidential Policy on Responding to Allegations of Research Misconduct

Dear Ahmet,

The Santa Cruz Division of the Academic Senate has completed its review of the proposed Presidential Policy on Responding to Allegations of Research Misconduct with the Committees on Faculty Welfare (CFW), Research (COR), Planning and Budget (CPB), Privilege and Tenure (CPT), rules, Jurisdiction, and Elections (CRJE), and Graduate Council (GC).

The committees raised concerns regarding the liability of researchers in supervisory positions, the intersectionality of the new policy with existing university and state policies, the process by which this policy will be implemented throughout the UC system, and the use of specific terms that do not align with the nature of scientific inquiry.

Role of Faculty in Reporting Research Misconduct

CPT notes language in the policy that provides Section IV on “Compliance/Responsibilities” indicates “all members of the UC research community are expected to cooperate in reporting suspected research misconduct.” However, the specifics of any requirements for reporting are never defined. For example, the policy does not describe whether and when faculty are mandatory reporters, or if this language means simply that faculty are required to cooperate with investigations when requested, or rather if it is a broad statement of expectation to create a culture of research integrity (along the lines of TSA “see something, say something”), but with no specified mandatory requirements or consequences. CPT suggests that specificity should be included to address (1) what types of research misconduct are subject to mandatory reporting and (2) whether reporting is required only when an offense is known to have occurred or also when suspicion has been raised by the faculty member themselves or by a third party and a faculty member hears about this suspicion. They warn that not indicating that known instances of misconduct rather than suspected misconduct should be the standard or the research community risks a loss of collegiality.

Another area lacking clarity pertains to the liability of lab directors for the misconduct of members in their research groups or community. COR notes that research labs are not typically run in the same way as corporate departments, with rigid hierarchical relationships, and have widely varying funding sources that may lead to a variance in accountability mechanisms. COR also notes that the definition of “lab director” has been carried forward from the prior iteration of this policy and may be too broad given the lack of a definition in the proposed policy.

GC observed that the policy states that Principal Investigators (PI) must foster an environment that promotes integrity. While no one would likely disagree with this, what is not clear is PI degree of exposure, if any, that the policy envisions for misconduct that occurs within their own research groups. Like CPT, they also observe that the policy is ambiguous on whether their duty to report includes suspected misconduct or only known misconduct. They also wonder if mandatory reporting may go beyond research supervisors (e.g. staff, students, other faculty).

Finally, on the issue of PIs, CFW notes that the document provides limited guidance on what should occur if a PI is unaware of misconduct occurring within their research group, and offers the following suggestions:

- The policy should clarify whether “primary responsibility” implies accountability for undetected misconduct by group members.
- Additional language is recommended to define “due diligence” expectations for PIs—e.g., does this mean recordkeeping, supervision, internal lab procedures, or other things—so that faculty can understand the scope of their obligations.
- A clearer explanation of how investigators can demonstrate compliance with integrity expectations (e.g., documentation of lab standards or oversight practices) would strengthen the policy and protect well-intentioned researchers.

Intersectionality of Proposed Policy with Existing Policies

Several of the committees thought that the policy lacked specificity on how it will intersect with existing policies which bear on faculty, as well as graduate student codes of conduct. GC observes that graduate students engage in research activities in different roles, sometimes as students and sometimes as researchers. The committee is unconvinced that a clear enough line has been drawn as if and when the policy applies to activities undertaken by graduate students in fulfillment of their course requirements. Language clarifying this distinction should be added.

CPT also remarked that policy places a great deal of weight on the term “discipline,” which has a very specific meaning within the Academic Personnel Policy 016 (APM-016), and within that context implies very specific processes and procedures in accordance with faculty rights and due process. They suggest that the language should allow for the development of procedures outside of those already provided for in the APM. Such language should describe how discipline in the context of the policy implicates formal processes such as Notices of Proposed Action for misconduct that rises to the level of violations of the Faculty Code of Conduct. Further, CPT suggests that the Committees on Privilege and Tenure be referred to specifically in the policy since they are the bodies on each campus charged with conducting faculty disciplinary hearings.

Relatedly, CRJE is concerned about how this policy will interact with existing state policies that may differ or exceed current federal policy. This arises out of concerns that the policy may inadvertently constrain scientific freedom, and that the policy does not address emerging misconduct that arises out of the use of artificial intelligence. Finally, CPT observes that the federal guidelines are referenced in the policy and suggests that they be included in the policy as an attachment.

Implementation Issues

The committees raised concerns focused on the policy's requirement for the creation of a "Deciding Official" and a Research Integrity Officer, whose roles are not well defined. GC was not clear on what qualifications these individuals should have, and how far their authority extended. They offer that the policy should include recusal or conflict-of-interest provisions, and more clearly explain who the point of contact would be if a researcher had an allegation made against them. CPB is concerned that the determinations made by a Deciding Official could circumvent established campus and systemwide procedures, raising the issues addressed in the section above.

Multiple committees also had concerns regarding implementation and process. CPB notes the ongoing importance of shared governance, noting that the implementation process should preserve close consultation with the Academic Senate to preserve shared governance and faculty rights. As implementation proceeds, CRJE wonders how conflicts between the policy and state, campus processes and procedures will be addressed, if these are not aligned. CFW had a number of overlapping concerns, and provided a set of specific recommendations:

- Consistent and transparent procedures across campuses to ensure equitable handling of allegations.
- Clear communication channels between Research Integrity Officers (RIOs), Deciding Officials, and faculty supervisors.
- Defined timelines for inquiries and investigations, given that protracted processes can have serious reputational and emotional impacts on all parties involved.

Problematic Terminology

CPT and CPB both find the replacement of "integrity" with "objectivity" in the current draft policy to be problematic. This is particularly true for the arts, humanities, and social sciences where the subjects of study make it impossible to provide a clear separation between the observer and the observed. CPT notes that that objectivity is itself a contested idea, without a shared definition among academic disciplines. In all disciplines conclusions are rarely if ever based solely on data, rather the *interpretation* of data, which can and does vary between different experts in a field. Researchers must therefore always make, in a sense, subjective interpretations based on their training, background, and scholarly insight. CPB urges that for this reason the text should revert to "integrity" to allow space for well-resonated interpretations which are present in all processes of discovery.

In summary, while supportive overall of the goals of the new policy, the Santa Cruz Division recommends the following main changes and refinements:

- More detailed and clearer definitions **regarding faculty role in reporting misconduct**, including more explicit descriptions of when faculty must report, if it is suspicion or only confirmed misconduct, and what kinds of "due diligence" or other actions satisfy mandatory requirements.
- **Intersectionality of existing policies, and existing discipline procedures**, including detailing how any conflict with other policies will be resolved, and how the new policy meshes with existing faculty disciplinary process.
- **More detail on implementation and powers of new titles created**; including transparent process, clear timelines, and established relationships between levels of review and authority, as well as more clarity on the "deciding official" role, including extent of authority, and processes for recusal, conflicts of interest, and preserving senate consultation in any rollout process.
- **Removal of problematic terminology**. Specifically, the term "objectivity" is used as a central guiding principle in the current policy but is deeply problematic for reasons detailed above. Responding committees strongly suggest reverting the term "integrity".

On behalf of the Santa Cruz Division, I thank you for the opportunity to provide comment on this policy.

Yours Sincerely,



Matthew D. McCarthy, Chair
Academic Senate, Santa Cruz Division

cc: Yat Li, Chair, Committee on Faculty Welfare
Nirvikar Singh, Chair, Committee on Research
Raphael Kudela, Chair, Committee on Planning and Budget
Chad Saltikov, Chair, Graduate Council
Eleonora Pasotti, Co-Chair, Committee on Rules, Jurisdiction, and Elections
Edward Shanken, Co-Chair, Committee on Rules, Jurisdiction, and Elections
Ruth Murray-Clay, Chair, Committee on Privilege and Tenure
Matthew Mednick, Executive Director, Academic Senate



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UNIVERSITY COMMITTEE ON RESEARCH POLICY (UCORP)

James Weatherall, Chair
Email: james.owen.weatherall@uci.edu

December 10, 2025

AHMET PALAZOGLU
CHAIR, ACADEMIC COUNCIL

RE: Review of Proposed Presidential Policy on Responding to Allegations of Research Misconduct

Dear Chair Palazoglu,

UCORP discussed the Proposed Presidential Policy on Responding to Allegations of Research Misconduct at its meeting on November 10th. UCORP recognizes the need to adjust current policy to come into compliance with new Public Health Service regulations, and we applaud that the policy is short and direct. However, we nonetheless found aspects of the policy confusing and potentially overly broad. In particular, it seems to us that Section III, labeled "Policy Text," does not state the intended policy, but instead makes general statements about activities covered by other policies (such as the UC Statement of Ethical Values) and which are not apparently related to research misconduct under the definitions in Section II. For instance, "Open publication and discussion" of research does not appear to be related to "fabrication, falsification, or plagiarism," and so it is not clear why it is mentioned in the "Policy Statement" section.

We suggest that the current Section III either be cut entirely or renamed / renumbered as something else, such as "Statement of Values" or "Relation to Other Policies and Expectations." In addition, a brief section titled "Policy Statement" should be added which says, simply, that each location will respond to allegations of research misconduct, as defined in Section II, according to the responsibilities and procedures described in Sections IV and V.

Sincerely,

James Weatherall
Chair, University Committee on Research Policy



UNIVERSITY OF CALIFORNIA

Academic Senate

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UNIVERSITY COMMITTEE ON ACADEMIC PERSONNEL
Nael Abu-Ghazaleh, Chair

November 10, 2025

—
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San Diego
San Francisco
Santa Barbara
Santa Cruz

Ahmet Palazoglu
Chair, Academic Council

RE: Proposed Presidential Policy on Responding to Allegations of Research Misconduct

Dear Chair Palazoglu,

The University Committee on Academic Personnel (UCAP) has reviewed the proposed Presidential Policy on Responding to Allegations of Research Misconduct, and we have a few comments.

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We encourage the University to specify which federal policies are under this umbrella given the rapid recent changes to federal practices (in this case from the Department of Health and Human Services). The committee also discussed whether a process that can accommodate future changes could be easier to adapt, perhaps through guidelines rather than policy changes. UCAP members also thought that current grants and personnel should be "grandfathered" into existing policy when possible to avoid unnecessary disruptions and if possible this should be reflected in the policy.

Sincerely,

Nael Abu-Ghazaleh
UCAP Chair

Cc: Susannah Scott, Academic Council Vice Chair
UCAP Members



UNIVERSITY OF CALIFORNIA

Academic Senate

Office of the President
1111 Franklin Street
Oakland, CA 94607

senate.universityofcalifornia.edu

UNIVERSITY COMMITTEE ON FACULTY WELFARE
KAREN BALES, CHAIR

December 10, 2025

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AHMET PALAZOGLU
CHAIR, ACADEMIC COUNCIL

RE: Systemwide Review of Proposed Presidential Policy on Responding to Allegations of Research Misconduct

Dear Chair Palazoglu,

The University Committee on Faculty Welfare (UCFW) has completed its portion of the systemwide review of the Proposed Presidential Policy on Responding to Allegations of Research Misconduct. Overall, we support the proposed changes to the ca. 1990 policy insofar as it updates language to match contemporary standards and state and federal regulations regarding fabrication, falsification, and plagiarism. We note, however, that this policy is essentially a place-holder for more specific campus policies, which means that local committees and Senate divisions will need to continue to monitor implementation in this important area.

Sincerely,

Karen L. Bales

Karen Bales, UCFW Chair

Cc: Academic Council Vice Chair Susannah Scott
Senate Executive Director Monica Lin
UCFW Members