

Research Misconduct Policy

Overview

Research misconduct involving Public Health Service (PHS) support is contrary to the interests of the PHS and the Federal government and to the health and safety of the public, to the integrity of research, and to the conservation of public funds. As a business that applies for and/or receives PHS funding, LeafLabs shares responsibility for the integrity of the research process. This document is official company policy regarding research misconduct at the workplace in compliance with 42 CFR 93, 42 CFR 50, and 42 CFR 94, as applicable.

Definitions

- **Research misconduct** is fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results.
- **Fabrication** is making up data or results and recording or reporting them.
- **Falsification** is manipulating research materials, equipment, or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.
- **Plagiarism** is the appropriation of another person's ideas, processes, results, or words without giving appropriate credit.

Research misconduct does not include honest error or differences of opinion. A finding of research misconduct requires significant departure from the accepted practices of the relevant research community. The misconduct must be committed intentionally, knowingly, or recklessly, and any allegations must be proven by a preponderance of evidence.

Reporting Research Misconduct

If you believe you have reasonable cause to allege research misconduct on the part of any LeafLabs researcher or other employee, you may do so by:

- Contacting the Office of Research Integrity (ORI) directly at 240-453-8400.
- Sending written notice to the designated misconduct policy and procedures officer at LeafLabs. The designated officer will forward your allegation to the ORI or other appropriate offices of the Department of Health and Human Services (DHHS), taking all reasonable and practical steps to protect your identity and the confidentiality of your allegations. The current designated officer is Justin Kinney. He may be reached via email at jkinney@leaflabs.com, or via US Mail at 288 Norfolk St. Ste. 2, Cambridge MA 02139. LeafLabs will then cooperate with the ORI or other appropriate offices to respond to the allegation.

Reporting Research Misconduct

LeafLabs takes its responsibilities for handling research misconduct extremely seriously. LeafLabs, in cooperation with the ORI or other DHHS offices, will enact a thorough, competent, objective, and fair response to any allegations of research misconduct on the part of its researchers or other employees. This response will include any necessary precautions to ensure that the individuals responsible for carrying out any part of a resulting

investigation are free from any apparent or real conflicts of interests in the matter. As part of this response and in coordination with the ORI or other appropriate offices, LeafLabs will:

- Provide written notice to the ORI and the respondent of the allegation, consistent with Federal time limits;
- Provide opportunity for the respondent to provide written comments on any resulting inquiry or report;
- Opportunity for the respondent to provide written comments on the draft report of the investigation, and provisions for the institutional investigation committee to consider and address the comments before issuing the final report;
- Institute appropriate interim institutional actions to protect public health, Federal funds and equipment, and the integrity of the PHS supported research process;
- Provide notice to ORI under 42 CFR 93.318 and notice of any facts that may be relevant to protect public health, Federal funds and equipment, and the integrity of the PHS supported research process;
- Take all reasonable and practical efforts to protect or restore the position and reputation of any complainant, witness, or committee member and to counter potential or actual retaliation against these complainants, witnesses, and committee members; and
- Provide full and continuing cooperation with ORI during its oversight review as required by law, including providing all research records and evidence under LeafLabs' control, custody, or possession and access to all persons within its authority necessary to develop a complete record of relevant evidence