

December 9, 2020

Elisabeth A. Handley
Director, Office of Research Integrity
U.S. Department of Health and Human Services
1101 Wootton Parkway
Suite 240
Rockville, MD 20852

Submitted electronically via email: OASH-ORI-Public-Comments@hhs.gov

RE: Comments in response to FR Doc. 2020-22992, "Request for Information and Comments on Fostering Research Integrity and the Responsible Conduct of Research"

Dear Ms. Handley,

The Federation of American Societies for Experimental Biology (FASEB) appreciates the opportunity to comment on the Office of Research Integrity's (ORI's) Request for Information and Comments on Fostering Research Integrity (RI) and the Responsible Conduct of Research (RCR) published in the [Federal Register](#) on October 18, 2020. As a coalition of 29 biological and biomedical scientific societies collectively representing over 130,000 individual scientists, FASEB is committed to fostering rigorous and transparent research. Education and training in responsible conduct of research and research integrity are critical to achieving this goal. FASEB's feedback focuses on the third category of the request, RI/RCR Training Sessions.

In 2015, FASEB engaged in a series of roundtable discussions to consider strategies researchers could adopt to enhance rigor and reproducibility of research findings. Although the initial goal of this effort was to develop recommendations to assist individual researchers in fulfilling new policies for federal funding, the [final recommendations](#) include actions for stakeholders across the research enterprise, including researchers, institutions, professional societies, and journals. A key theme arising from these discussions was the need for all research team members to commit to good research practices. Thus, as ORI evaluates existing RI/RCR training modules, we strongly encourage attention to programming spanning laboratory roles, including principal investigators, core facility staff, staff scientists, postdoctoral scholars, graduate and undergraduate students, and technicians. In addition, supplementary modules may be necessary to ensure appropriate use of new technologies and methodologies. We recognize that RI/RCR instruction is already a condition of award for training grants. To ensure uniform RI/RCR training across research team, we suggest expanding this requirement to all individuals supported by HHS funds.

Recognizing issues with RI tend to arise at the publication stage, we strongly encourage ORI to work with scientific publishers to establish uniform expectations to address RI. The majority of FASEB's 29 member societies are actively engaged in scientific publishing and have developed extensive resources for authors and reviewers that could serve as excellent resources for RI/RCR training (see attachment). Given the breadth of disciplines represented by FASEB, these resources could also help researchers understand the nuances of different fields.

Another area in which FASEB and its member societies could assist ORI's efforts to foster and promote RI/RCR is through uniform education and training sessions and resources. Scientific societies host regular convenings of its members for scientific conferences, workshops, and other professional development opportunities. Current models rely on RI/RCR training independently administered by individual institutions, resulting in resource-based variability. To eliminate this variability, we encourage ORI to work with scientific societies in the distribution of uniform resources and to host educational sessions as a supplement to conference programming. Such a model would maximize time and resources for all parties – investigators, trainees, and ORI – and ensure high-quality, uniform RI/RCR training. Similarly, offering regular RI/RCR training sessions could be incorporated as a requirement for federal support for scientific conferences (e.g., NIH R13 grants).

FASEB appreciates the opportunity to provide input on this important topic. We look forward to working with ORI and other stakeholders to develop RI/RCR education and training resources to reinforce the importance of rigorous and transparent research as a core value of the biological and biomedical research community.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis B. Justement". The signature is fluid and cursive, with a large loop at the end.

Louis B. Justement, PhD
FASEB President

Attachment: Links to FASEB Member Society Resources

Attachment: Links to FASEB Member Society Resources

FASEB

FASEB Journal

[Author Guidelines](#)

FASEB BioAdvances

[Author Guidelines](#)

American Aging Association

GeroScience

[Ethical Responsibilities of Authors](#)

[Integrity of Research and Reporting](#)

American Association for Anatomy

The Anatomical Record

[Author Guidelines](#)

Anatomical Sciences Education

[Author Guidelines](#)

Developmental Dynamics

[Author Guidelines](#)

American Association of Immunologists

The Journal of Immunology

[Journal Policies](#)

ImmunoHorizons

[Journal Policies](#)

American College of Sports Medicine

Medicine & Science in Sports & Exercise

[Author Instructions and Guidelines](#)

Exercise and Sport Sciences Reviews

[Author Instructions and Guidelines](#)

Current Sports Medicine Reports

[Author Instructions and Guidelines](#)

ACSM's Health and Fitness Journal

[Author Instructions and Guidelines](#)

Translational Journal of the ACSM

[Author Instructions and Guidelines](#)

American Federation for Medical Research

Journal of Investigative Medicine

[BMJ Author Hub - Policies](#)

Journal of Investigative Medicine High Impact Case Reports

[Committee on Publication Ethics Guidelines](#)

[Uniform Requirements for Manuscripts Submitted to Biomedical Journals](#) (formulated by the International Committee of Medical Journal Editors)

American Peptide Society

Peptide Science

[Publication Ethics](#)

American Physiological Society

*Publishes 16 scientific journals in physiology and related fields

[Information for Authors](#)

[Experimental Details to Report in Your Manuscript](#)

[APS Ethics Policy](#)

[Resources: Reproducibility in Research](#)

American Society for Biochemistry and Molecular Biology

Journal of Biological Chemistry

[Author Resources](#)

Molecular & Cellular Proteomics

[Author Information](#)

Journal of Lipid Research

[Guide for Authors](#)

American Society for Bone and Mineral Research

Journal of Bone and Mineral Research

[Journal Policies](#)

Journal of Bone and Mineral Research Plus

[Author Guidelines](#)

American Society for Clinical Investigation

Journal of Clinical Investigation

[Information for Authors](#)

Journal of Clinical Investigation Insight

[Information for Authors](#)

[Publication Ethics](#)

American Society for Investigative Pathology

American Journal of Pathology

[Scientific Integrity Policy](#)

The Journal of Molecular Diagnostics

[Scientific Integrity Policy](#)

American Society for Nutrition

[Publications Guidelines and Policies](#)

American Society for Pharmacology and Experimental Therapeutics

Drug Metabolism and Disposition

[Instructions to Authors](#)

The Journal of Pharmacology and Experimental Therapeutics

[Instructions to Authors](#)

Molecular Pharmacology

[Instructions to Authors](#)

Pharmacological Reviews

[Instructions to Authors](#)

Association of Biomolecular Resource Facilities

Journal of Biomolecular Techniques

[Editorial Policy](#)

Association for Molecular Pathology

The Journal of Molecular Diagnostics

[Scientific Integrity Policy](#)

[Validation Resources](#)

[Assay Development](#)

[Clinical Practice Guidelines and Reports](#)

Endocrine Society

Endocrine Reviews

[Author Guidelines](#)

Endocrinology

[Author Guidelines](#)

Journal of Clinical Endocrinology & Metabolism

[Author Guidelines](#)

Journal of the Endocrine Society

[Author Guidelines](#)

Environmental Mutagenesis and Genomics Society

Environmental and Molecular Mutagenesis

[Author Guidelines](#)

Genetics Society of America

Genetics

G3

[Scope and Publication Policies](#)

[Scope and Publication Policies](#)

The Histochemical Society

Journal of Histochemistry & Cytochemistry

[Instructions to Authors](#)

Society for Birth Defects Research & Prevention

Birth Defects Research

[Author Guidelines](#)

Society for Developmental Biology

Developmental Biology

WIREs Developmental Biology

[Guide for Authors](#)

[Overview & Guidelines](#)

Society for Glycobiology

Glycobiology

[Instructions to Authors](#)

Society for Experimental Biology and Medicine

Experimental Biology and Medicine

[Submission Guidelines](#)

Society for Leukocyte Biology

Journal of Leukocyte Biology

[Author Guidelines](#)

Society for Redox Biology and Medicine

Free Radical Biology and Medicine

Redox Biology

Advances in Redox Research

[Guide for Authors](#)

[Guide for Authors](#)

[Guide for Authors](#)

Society for the Study of Reproduction

Biology of Reproduction

[Instructions to Authors](#)

Society of Toxicology

Toxicological Sciences

[Author Guidelines](#)

Associate Member

American Society of Human Genetics

The American Journal of Human Genetics

Human Genetics and Genomics Advances

[Information for Authors](#)

[Information for Authors](#)