



Approving University Official(s): Provost, Vice President for Research

Responsible Office: Office for Research Integrity

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POLICY FOR REVIEWING ALLEGED RESEARCH MISCONDUCT

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Policy Statement

It is the policy of Northwestern University to inquire into and, if necessary, investigate and resolve all instances of alleged research misconduct.

Purpose

This Policy aims to protect the integrity of all Northwestern research, and to promote institutional compliance with federal regulations governing research misconduct.

Audience

Faculty, students, postdoctoral fellows, other trainees, staff, and all other current and former members of Northwestern University's research community.

Definitions

Research Misconduct

Research misconduct is defined as fabrication, falsification, plagiarism, or other serious deviation from commonly accepted practices in the relevant scientific community 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. Plagiarism includes but is not limited to the unattributed verbatim or nearly verbatim copying of sentences and paragraphs from another's work that materially misleads the reader regarding the contributions of the author. Plagiarism does not include the limited use of identical or nearly identical phrases that describe a commonly used methodology.
- Serious deviation from accepted practices includes but is not limited to:
 1. Abusing confidentiality, including the use of ideas and preliminary data gained from:
 - a. Access to privileged information through the opportunity for editorial review of manuscripts submitted to journals; and
 - b. Peer review of proposals being considered for funding by agency panels or by internal committees, such as the Institutional Review Board (IRB), and the Institutional Animal Care and Use Committee (IACUC).
 2. Stealing, destroying, or damaging the research property of others with the intent to alter the research record; and
 3. Directing, encouraging, or knowingly allowing others to engage in fabrication, falsification, or plagiarism.

Research misconduct does not include:

- Honest error;
- Differences in scientific opinions;
- Authorship or credit disputes;
- Self-plagiarism; and
- Misconduct unrelated to research

Other Relevant Definitions

Accepted practices of the relevant research community refer to practices established by federal regulations, as well as the commonly accepted professional codes or norms within the overarching community of researchers.

Allegation refers to a written or verbal disclosure of possible research misconduct to an institutional official, including Department Chairs, Deans, the Vice President for Research (VPR), the Associate Vice President for Research (AVPR), the Provost, and the Research Integrity Officer (RIO), or other institutionally recognized official reporting channels.

Assessment refers to the initial review process within the Office for Research Integrity (ORI) to determine whether the alleged conduct is subject to this Policy, and if so whether each allegation appears to fall within the definition of research misconduct and is sufficiently credible and specific so that potential evidence of research misconduct may be identified. The assessment only involves the review of readily accessible information relevant to each allegation.

Complainant refers to an individual who makes an allegation of research misconduct. It is expected that a Complainant will make allegations of research misconduct in good faith.

Conflict of interest For the purposes of this Policy and its implementation, "conflict of interest" refers to a situation in which an individual's financial, professional, or other personal considerations relative to the complainant, respondent, witnesses or other parties involved (e.g., committee members) may influence the individual's professional judgment in exercising their duties in accordance with this Policy. Conflicts of interest may include, but are not limited to, co-authorship of work with the Respondent or Complainant, or professional or personal relationship with the Respondent or Complainant beyond that of mere acquaintances or colleagues (e.g., current or former student or mentor relationship, direct supervisory or subordinate job relationship, or marital/partner

relationship).

Consultant (or Expert) refers to any individual, affiliated or not with Northwestern, possessing the experience or expertise necessary and appropriate to address the subject matter of a given allegation. If experts are utilized, their role will be advisory during the assessment, inquiry and/or investigation, or as warranted by the circumstances of the matter.

Deciding Official (DO) refers to the institutional official who makes the institutional decision on allegations of research misconduct and any institutional actions. The Deciding Official will not be the same individual as the Research Integrity Officer.

Evidence refers to anything offered to or obtained by ORI during a research misconduct proceeding that tends to prove or disprove the existence of an alleged fact. Evidence includes documents, whether in hard copy or electronic form, information, tangible items, and testimony.

Good faith as applied to a Complainant or witness refers to having a reasonable belief in the truth of one's allegation or testimony, based on the information known to the Complainant or witness at the time. An allegation or cooperation with a research misconduct proceeding is not in good faith if made with knowledge of or reckless disregard for information that would negate the allegation or testimony. Good faith as applied to an institutional official or committee member refers to cooperating with the research misconduct proceeding by impartially carrying out the duties assigned for the purpose of helping the University meet its responsibilities under this part. An institutional official or committee member who is honest and not influenced by conflicts of interest with those involved in the research misconduct proceeding is presumed to be acting in good faith.

Inquiry refers to the post-assessment information-gathering and fact-finding process to determine whether an allegation or apparent instance of research misconduct is sufficiently credible and specific such that evidence of potential research misconduct can be identified.

Institutional record refers to

1. The records that the University compiled or generated during the research misconduct proceeding, except records the University did not consider or rely on. These records include, but are not limited to: (a) Documentation of the assessment; (b) If an inquiry is conducted, the inquiry report and all records (other than drafts of the report) considered or relied on during the inquiry, including, but not limited to, research records and the transcripts of any transcribed interviews conducted during the inquiry, information the Respondent provided to the University, and the documentation of any decision not to investigate; (c) If an investigation is conducted, the investigation report and all records (other than drafts of the report) considered or relied on during the investigation, including, but not limited to, research records, the transcripts of each interview conducted, and information the Respondent provided to the University; and (d) Decision(s) by the Deciding Official, such as the written decision from the Deciding Official.
2. A single index listing all the research records and evidence that the institution compiled during the research misconduct proceeding, except records the institution did not consider or rely on.
3. A general description of the records that were sequestered but not considered or relied on.

Intentionally¹ refers to acting with the aim or purpose of carrying out the act.

Investigation refers to the process by which the institution formally develops a factual record and examines that record to determine whether research misconduct has occurred, if so, by whom, and to recommend appropriate institutional actions.

Knowingly¹ refers to acting with awareness of the act.

¹ Funding agencies and sponsors may have differing definitions. To the extent that the definitions of an applicable funding agency and sponsor conflicts with Northwestern's definition, the agency and sponsor's definition will supersede and apply.

ORI refers to Northwestern's Office for Research Integrity, which is responsible for administering this Policy and the research misconduct proceeding at the University.

Preponderance of the evidence refers to the proof by evidence that, compared with evidence opposing it, leads to the conclusion that the fact at issue is more likely true than not.

Recklessly¹ refers to acting with indifference to a known risk, such as proposing, performing or reviewing research, or reporting research results with indifference to a known risk of fabrication, falsification or plagiarism.

Research refers to any systematic investigation, experiment, study, evaluation, demonstration or survey designed to develop or contribute to general or specific knowledge.

Research Integrity Officer (RIO) refers to the institutional official appointed by the Vice President for Research to have primary responsibility for administering this Policy and any other Northwestern procedures adopted to implement it, and for reporting to federal oversight agencies, as necessary and appropriate.

Research misconduct proceeding refers to any actions related to alleged research misconduct taken under this Policy, including allegation assessments, inquiries, and investigations.

Research record refers to the record of data or results that embody the facts resulting from scientific inquiry. Data or results may be in physical or electronic form. Examples of items, materials, or information that may be considered part of the research record include, but are not limited to, research proposals, raw data, processed data, clinical research records, laboratory records, study records, laboratory notebooks, progress reports, manuscripts, abstracts, theses, records of oral presentations, online content, lab meeting reports, and journal articles. This list is not exhaustive, and examples of other types of research records can be found in Northwestern's Research Data: Ownership, Retention, and Access Policy.

Respondent refers to the individual against whom an allegation of research misconduct is directed or who is the subject of a research misconduct proceeding.

Sequestration refers to the collection and secure segregation of research records, equipment, and other tangible or intangible information and evidence for the specific purpose of assessing allegations as part of the research misconduct proceeding.

Policy Implementation

1. Introduction

Northwestern values the honesty and integrity of our research community in accordance with our mission of conducting innovative research. Northwestern is dedicated to ensuring the credibility and trustworthiness of our research, to protecting our community from unsubstantiated allegations of research misconduct, and to upholding Northwestern's high standards for our research activity. Misconduct in research represents a breach of Northwestern's expectations, the standards expected by our sponsors, the public trust, and the expectations of scholarly communities for accuracy, validity, and integrity in research.

It is the policy of Northwestern to inquire into and, if necessary, investigate and resolve all instances of alleged research misconduct, and to comply in a timely manner with sponsor requirements for reporting cases of possible research misconduct, when sponsored project funds are involved.

As a recipient of federal research funds, Northwestern must have written institutional policies and procedures in place to handle allegations of research misconduct. This Policy establishes the research integrity standard at

Northwestern, the Policy's applicability, the evidentiary standards, roles and responsibilities, general principles, institutional actions, and exceptions and exemptions to this Policy.

2. Northwestern's Research Integrity Standard

Northwestern is responsible for fostering a research environment that promotes research integrity and the responsible conduct of research, discourages research misconduct, and deals promptly with allegations or evidence of possible research misconduct. Northwestern researchers are expected to adhere to the highest professional standards of intellectual honesty and integrity in designing, proposing, performing, and reviewing research, and in reporting research results. Meeting University standards includes but is not limited to adhering to University policies and all applicable sponsor and agency guidelines and regulations; appropriately acknowledging direct and indirect contributions of peers, collaborators, and others; the ability to explain how results are reached; maintaining clear and accurate research records; and ensuring accuracy of research both before publication and/or dissemination of research and after publication.

3. Applicability

This Policy applies to any Northwestern research or related activities conducted by Northwestern researchers or with Northwestern resources, regardless of funding sources, and to the current or former Northwestern researchers (faculty, students, postdoctoral fellows, other trainees, staff, and all other members of Northwestern's research community) who conducted such research or related activities at Northwestern or with Northwestern resources. Northwestern typically does not have jurisdiction over allegations related to research conducted at another research institution.

4. Evidentiary Standards

Northwestern applies the evidentiary standards required by federal regulations. In the absence of conflicting regulatory standards, the following evidentiary standards will apply:

Standard of proof

An institutional finding of research misconduct must be proved by a preponderance of the evidence.

Burden of proof

- A. Northwestern has the burden of proof for making a finding of research misconduct.
- B. A Respondent's destruction, absence of, or Respondent's failure to provide research records adequately documenting the questioned research is evidence of research misconduct where Northwestern establishes by a preponderance of the evidence that the Respondent intentionally, knowingly, or recklessly (i) had research records and destroyed them, had the opportunity to maintain the records but failed to do so, or maintained or claimed to possess research records but failed to produce them in a timely manner upon request, and (ii) that the respondent's conduct constitutes a significant departure from accepted practices of the relevant research community.
- C. The Respondent has the burden of going forward with and proving, by a preponderance of the evidence, all relevant affirmative defenses, such as honest error or scientific differences of opinion, and any mitigating factors relevant to a decision to take institutional actions.

5. Roles and Responsibilities

Provost

The Provost is the Deciding Official for research misconduct investigations. The Provost will receive the Investigation Committee recommendations and, in consultation with the Vice President for Research, the RIO, and

applicable Deans, as appropriate, will make the final institutional determination on allegations of research misconduct. As the Deciding Official, the Provost may also take institutional actions, in accordance with established Northwestern procedures. The Provost may delegate the responsibilities of Deciding Official to another institutional official when the Provost determines such delegation is necessary and appropriate.

Vice President for Research (VPR)

The VPR ensures the implementation of this Policy, including ensuring that all parties cooperate and that the institutional administration supports and protects the process. The VPR receives and reviews the final reports of the Inquiry and Investigation Committees, along with all other relevant attachments to the committee reports. Following an inquiry, the VPR determines whether an investigation should be initiated or whether the allegation(s) should be dismissed and notifies the Respondent of the institutional inquiry decision. The VPR may also take institutional action at any stage in the proceeding to protect Northwestern research, the research community, and/or the scientific record. Following an investigation, the VPR provides recommendations to the Provost relative to the results of research misconduct investigations and may suggest institutional actions. The VPR may delegate these responsibilities to another institutional official when the VPR determines such delegation is necessary and appropriate.

Deans

The Deans and their designees, typically the Research Deans, ensure implementation of this Policy in their respective schools. The Deans report knowledge of allegations of research misconduct to the RIO. The Deans ensure cooperation of Respondents and other individuals in their respective schools in instances of allegations of research misconduct, including, but not limited to, the sequestration of research records and/or other relevant information and documentation relative to the allegations of research misconduct. The Deans assist ORI by recommending committee members, in accordance with the Procedures.

Research Integrity Officer (RIO)

The RIO, assisted by ORI staff, has primary responsibility for overseeing this Policy and its implementing Procedures and applicable standards imposed by government or external funding sources and for promoting the responsible conduct of research at Northwestern. The RIO has the authority and responsibility to take all reasonable and practical steps to sequester relevant research records and other evidence. The RIO also has the responsibility to review any disclosure of a potential, perceived, or actual conflict of interest relative to the parties (i.e. complainant, respondent, witnesses) to determine what steps, if any, are necessary to address them, and if an unresolved conflict of interest exists to determine what steps, if any, are necessary to ensure such conflicts do not influence participants in carrying out their duties under the policy.

The RIO (a) determines whether the assessment of research misconduct allegations results in an inquiry, (b) is a member of the Inquiry Committee, (c) oversees the activities of the Investigation Committee, and (d) assists in administering and enforcing any institutional actions.

The RIO ensures proper and timely reporting to relevant oversight agencies, as dictated by sponsor regulations and policies. When the research misconduct proceeding or allegations involve outside institutions, the RIO coordinates with outside institutional officials, including determining the lead institution for joint proceeding, as necessary and appropriate. The RIO is responsible for ensuring the appropriate actions are taken to protect the integrity of the scientific record, including but not limited to notifying journals, professional societies, law enforcement agencies, sponsors, and others, as necessary and appropriate. The RIO may also take institutional action at any stage in the proceeding to protect Northwestern research, the research community, and/or the scientific record at the direction of the VPR.

The RIO can delegate these responsibilities as necessary and appropriate.

Office for Research Integrity (ORI)

ORI serves as Northwestern's independent and objective agent in the research misconduct proceeding. The ORI staff, under direction of the RIO, support and facilitate the assessment, inquiry, and investigation. ORI has the authority and responsibility to take all reasonable and practical steps to sequester relevant research records and other evidence. ORI formalizes allegations of research misconduct and obtains, disseminates, and summarizes information relative to the allegations of research misconduct. ORI is responsible for providing ongoing support and guidance to the committee members throughout the research misconduct proceeding. ORI serves as the liaison between the committee members, Complainant, Respondent, applicable oversight agencies, and relevant parties. ORI is responsible for educating Complainants, Respondents, and committee members about Northwestern's research misconduct Policy and Procedures, as well as applicable regulations and guidelines. ORI maintains and ensures the confidentiality and security of the relevant files, including sequestered records and documentation of the research misconduct proceeding.

Complainant

The Complainant is responsible for making allegations in good faith, maintaining confidentiality, and cooperating with all proceedings under this Policy and implementing Procedures. The Complainant will be informed by ORI of the results of the assessment, inquiry, and investigation.

Respondent

The Respondent is responsible for maintaining confidentiality and cooperating with all proceedings under this Policy and implementing Procedures, including sequestration of research records and evidence relevant to each allegation. The Respondent is responsible for identifying and providing research records related to the research in question. The Respondent is responsible for working with the RIO and any University official to ensure the appropriate actions are taken to protect the integrity of the scientific record, including but not limited to notifying journals, professional societies, law enforcement agencies, sponsors, and others, as necessary and appropriate.

Standing Research Integrity Committee

The Standing Research Integrity Committee is a panel of faculty members appointed to serve as potential Inquiry and/or Investigation Committee members, as needed, for the purpose of completing the inquiry and investigation processes pursuant to this Policy and the federal regulations. These faculty can also serve as consultants during the assessment, as necessary.

Inquiry Committee

The Inquiry Committee is responsible for conducting an initial review of the available evidence and determining if an allegation has substance and falls within the definition of research misconduct to warrant an investigation. The Inquiry Committee may also identify issues that would justify broadening the scope beyond the initial allegations, including the addition of Respondents, and may recommend that Northwestern examine these issues. An Inquiry Committee is not required to perform a full review of all the evidence related to each allegation.

Investigation Committee

The Investigation Committee is responsible for conducting a thorough examination of all facts and evidence to determine whether each allegation constitutes research misconduct and to recommend appropriate institutional actions. The Investigation Committee may also identify issues that would justify broadening the scope beyond the initial allegations, including the addition of Respondents, and may recommend that Northwestern examine these issues.

6. General Principles

6.1 Requirements for Findings of Research Misconduct

A finding of research misconduct requires that:

- There be a significant departure from accepted practices of the relevant research community; and
- The research misconduct be committed intentionally, knowingly, or recklessly; and
- The allegation be proven by a preponderance of the evidence.

6.2 Responsibility to Report Research Misconduct

All faculty, students, postdoctoral fellows, staff, trainees, and all members associated with Northwestern's research community are expected to report observed, suspected, or apparent research misconduct by disclosing the allegation to an institutional official at Northwestern, such as Department Chairs, Deans, the VPR, an AVPR, the Provost, the RIO, or other institutionally recognized official channels for reporting misconduct. If an individual is unsure whether a suspected incident falls within the definition of research misconduct, they may meet with or contact the RIO to discuss the suspected research misconduct informally, which may include discussing it anonymously and/or hypothetically.

6.3 Responsibility to Respond to Specific and Credible Allegations of Research Misconduct

Northwestern will respond to each specific and credible allegation of research misconduct for which the institution is responsible in a thorough, competent, objective, and fair manner. Because Northwestern values the credibility and integrity of our research activities, the University performs a careful assessment of all allegations brought to the attention of the RIO or other institutional officials. The RIO shall consider and act upon any specific and credible information which comes to their attention indicating that research misconduct may have occurred.

6.4 Cooperation with the Research Misconduct Proceeding

Individuals covered under this Policy and its implementing Procedures must cooperate with and abstain from obstructing the efforts of the RIO, ORI, and all parties involved in the review of allegations and the conduct of inquiries and investigations. Respondents and other institutional members have an obligation to provide relevant information to the RIO or other institutional officials for research misconduct allegations. The RIO may determine it is necessary to sequester original research records and materials relevant to an allegation. Any individual involved in the research misconduct proceeding must disclose to the RIO if a potential, perceived or actual conflict of interest arises at any stage of the proceeding so that it may be appropriately reviewed and addressed. Failure to cooperate in, as well as the obstruction of or interference with, the University's review of the allegations and sequestration of research records and materials, as required by this Policy, may result in disciplinary action.

6.5 Protection of Complainant and Others

Northwestern strictly prohibits retaliation in any form against any individual for reporting or inquiring in good faith about what they believe to be research misconduct, or for participating in a proceeding pursuant to this Policy. Northwestern specifically prohibits retaliation against good faith Complainants, witnesses, or committee members. University officials will take all reasonable and practical steps to protect the positions and reputations of these individuals including protecting them from retaliation by Respondents and/or other institutional members. Individuals should immediately report any alleged or apparent retaliation to the RIO.

Northwestern, to the maximum extent practicable, protects the privacy of those who report research misconduct in good faith. If the Complainant requests anonymity, Northwestern makes reasonable efforts to honor the request during the allegation assessment, inquiry, or investigation, consistent with a thorough, competent, objective, and fair research misconduct proceeding, and as allowed by law. It is important to recognize, however, that anonymity cannot be guaranteed in all situations.

6.6 Protection of Respondent

ORI conducts the research misconduct proceeding confidentially and in a manner that ensures a fair process without compromising public health and safety and without compromising the proceeding. If requested and as appropriate, Northwestern will make all reasonable and practical efforts to restore the reputation of Respondents not found to have engaged in research misconduct.

6.7 Confidentiality

All participants involved in a proceeding under this Policy must keep confidential all information regarding the allegations and the proceeding. Disclosure of the identity of Respondents, Complainants, witnesses, and research participants while conducting the research misconduct proceedings is limited, to the extent possible, to those who need to know, as determined by Northwestern in its sole discretion, consistent with a thorough, competent, objective and fair research misconduct proceeding, and as allowed by law. Examples of those who need to know may include institutional review boards, journals, editors, publishers, co-authors, and collaborating institutions. Following the conclusion of the institutional research misconduct proceeding, Northwestern may continue to maintain confidentiality if Northwestern determines such confidentiality is appropriate, however limitations on the identity of respondents, Complainants, and witnesses will no longer apply, and Northwestern may make appropriate disclosures in its sole discretion.

Confidentiality does not prohibit University officials from consulting, on a confidential basis and to the extent necessary, with persons within or outside the University community with relevant experience or expertise to thoroughly investigate the allegations, or from disclosing information, on a need to know basis, to individuals responsible for oversight of the Respondent's research activities or to other University officials involved in the questioned research, such as Department Chairs or Deans. Nothing in this Policy prohibits Northwestern from managing published data or acknowledging that data may be unreliable, or the Deciding Official from taking an institutional action.

The University may release information concerning alleged research misconduct when the University determines in its sole discretion that disclosure is necessary or appropriate to protect Northwestern research, the research community, and/or the scientific record. Such disclosures will be made in accordance with all applicable laws, and may occur under a variety of circumstances including:

- A. When required by the rules of, or contract with, a funding entity;
- B. As required by the need to inform the research community in order to protect the integrity of the research involved;
- C. As part of an institutional action;
- D. When the health and safety of the public is at risk, including an immediate need to protect human participants or animals involved in the research;
- E. When relevant to an external research integrity proceeding; and
- F. As required by law.

The VPR is responsible for determining when such release of information is necessary or appropriate to protect Northwestern research, the research community, and/or the scientific record, and may consult with the DO, AVPR research dean, and/or RIO. During the course of the research misconduct proceeding, if the release of information outside the University is deemed necessary, the Respondent may be informed of the release, if appropriate.

6.8 Safeguarding Data and Evidence

Individuals covered under this Policy will make reasonable efforts to securely safeguard the integrity of all data and evidence related to the research in question and gathered during the proceeding. No relevant records, including research records and institutional records, may be deleted or altered in any way without express permission of the RIO.

6.9 Time Limitations and Exceptions

This Policy applies only to allegations of research misconduct occurring within six years of the date the University, oversight agency, or funding entity receives an allegation of research misconduct. For allegations that fall outside of the six-year time limit, Northwestern may at its own discretion apply this Policy, or resolve the allegations outside of this Policy.

Exceptions to the six-year limitation include the following:

- A. Subsequent use exception: the instance where the Respondent continues or renews any incident of alleged research misconduct that occurred before the six-year limitation through the use of, republication of, or citation to the portion(s) of the research records (e.g., processed data, journal articles, funding proposals, data repositories) that are alleged to have been fabricated, falsified, or plagiarized for the potential benefit of the Respondent.
- B. Health or safety of the public exception: if the University determines that the alleged research misconduct, if it occurred, would possibly have substantial adverse effect on the health or safety of the public.

6.10 Referrals

At any time during the research misconduct process, if Northwestern's review of the allegation(s) identifies potential misconduct under the jurisdiction of another institution, the RIO will contact the appropriate institution to apprise it of the concerns.

7. **Institutional Actions**

Institutional actions following a determination of research misconduct can include any sanctions referenced in the [Faculty Handbook](#), [Student Handbook](#), and/or the [Employee Handbook](#), such as termination, performance improvement/management process and required training or education. Additionally, institutional actions may include but are not limited to suspension of research activities, special monitoring of research; notification of current employer; withdrawal, retraction, or correction of all pending or published abstracts and papers emanating from the research; restitution of funds to the grantor agency; removal of the responsible person from the particular project; letter of reprimand; and other actions deemed appropriate. As appropriate, institutional actions may be taken regardless of a finding to correct the scientific record, supplement training and education or remedy other issues identified by the investigation.

Some institutional actions may be taken by the VPR at any stage of the research misconduct proceeding to protect Northwestern research, the research community, and/or the scientific record and are based on several factors, including the scope and severity of the conduct. These actions include but are not limited to the following: embargoing data or publications, grant proposals or other submissions; monitoring of research; performance improvement/management process; withdrawal, retraction, or correction of pending or published abstracts and papers; removal of the responsible person from the particular project; and/or other actions deemed appropriate.

The RIO will ensure the implementation of any institutional actions.

Importantly, Northwestern has a responsibility to ensure an accurate scientific record and the institutional determination regarding the correction of the scientific record is final and findings of research misconduct cannot be appealed.

8. **Exceptions and Exemptions to the Policy**

Allegations of misconduct occurring outside the research setting are excluded from the Policy, as are allegations in the context of research that do not meet the definition of research misconduct. For example, disputes about collaboration or mentoring, misallocation of funds, sexual harassment, discrimination, or academic misconduct that is not fabrication, falsification or plagiarism, as defined in the Policy. Allegations determined by the RIO to

fall outside the scope of this Policy may be addressed under other Northwestern policies or guidance.

Consequences of Violating this Policy

In addition to institutional actions taken as a result of a research misconduct proceeding, the University may impose consequences for violating this Policy. Failure to comply with this Policy, including but not limited to breach of confidentiality, failure to submit information or research records required by this Policy, retaliation, or failure to cooperate, will be handled, when applicable, in accordance with disciplinary policies and procedures as stipulated in Northwestern's Faculty Handbook, Staff Handbook, or Student Handbook, as applicable. Violations of this Policy may result in disciplinary action or sanctions, up to and including termination of employment, faculty appointment, or expulsion, as applicable.

Related Information

[Procedures for Reviewing Alleged Research Misconduct](#)

[Northwestern University Conflict of Interest policies webpage](#)

[Northwestern University Policy on Non-Retaliation](#)

[Northwestern University Policy on Research Data: Ownership, Retention and Access](#)

[42 CFR 93, Public Health Service Policies on Research Misconduct](#)

[45 CFR 689, National Science Foundation Research Misconduct Regulation](#)

Northwestern University would like to acknowledge that this Policy was modeled on and referenced content from the federal Office of Research Integrity's *Sample Policy and Procedures for Responding to Allegations of Research Misconduct*, and institutional policies and procedures at The Pennsylvania State University, Indiana University, The Ohio State University, the University of Alabama, Florida State University, and The George Washington University.

Contacts

If you have any questions regarding this Policy, you may:

1. Call the Office for Research Integrity at 312.503.0054, or
2. Email researchintegrity@northwestern.edu

History

Policy originated on September 1, 1989, and was last amended in December 2025.

Policy URL

<https://researchintegrity.northwestern.edu/docs/ori-misconduct-policy.pdf>