## Statement for OMB on Differentiating Medical Schools' Misconduct Education Efforts

This statement is intended to address the issue raised by OMB staff of how we intend to differentiate groups of medical schools in which the responding researchers perceive that their institutions are not providing adequate education about research misconduct from those in which the opposite is perceived, without actually identifying the medical schools. Our response is by differentiating them according to characteristics of the institutions.

We intend to measure the adequacy of misconduct education efforts by the proportion of respondents in the institution who indicate they have not received adequate information and training opportunities to recognize and respond to research misconduct. In addition to using survey respondent reports of their institution's staff misconduct education efforts to characterize the institutions, we will examine whether meaningful patterns or trends are revealed when we differentiate them by readily available nonsurvey respondent measures such as the institution's NIH annual research award amount, NIH annual research award number, NIH research award rank, whether its a public or private institution, its Census region, whether the institution's research misconduct policy is accessible on the Internet, the "number of clicks" needed to access the institution's research misconduct policy on the Internet, and the number of reported research misconduct activities in annual reports filed with ORI.

We already have the NIH and ORI data, the public/private status of the medical school, and the URL for each medical school. As part of this project, we have a plan to search each medical school's web site for its research misconduct policy and procedures, record how quickly we find it, and abstract key elements of it (i.e., is research misconduct defined, to whom is an allegation to be reported, etc.). With these categorical measures of medical school characteristics, we can tabulate them by the perceptions of a majority of their responding staff with regard to their perceptions/reports/knowledge of the institution's misconduct education efforts.