

Agricultural Marketing Service – Scientific Integrity Policy Statement

Informational Brochure

In August 2011, the Secretary of Agriculture issued the United States Department of Agriculture's (USDA's) Scientific Integrity Policy (SIP) memorandum that provides guidance to USDA employees and cooperators on the principles of conducting scientific activities, as well as the proper use of scientific and scholarly findings. The policy promotes a culture of transparency, integrity, and ethical behavior in the development, communication, and application of scientific data analyses in USDA decision-making activities. Access to reliable information is vital to the Agricultural Marketing Service's (AMS') mission to facilitate the strategic marketing of agricultural products in domestic and international markets. In many cases, AMS receives data from program stakeholders in order to fulfill requirements stated in assistance documents and/or Memorandum of Understanding (MOUs). This information is used to support Agency rulemaking, public policy development, inspections for voluntary and regulatory purposes, and grading or distributing commodity market news to the public.

The Agency's stated core values of honesty, integrity, and customer service play an important role in this policy. These guidelines are directed to all AMS employees, cooperators, and contractors who are engaged in, supervise, or manage the collection and interpretation of data or direct science activities on behalf of the Agency. This policy does not replace the Standards of Ethical Conduct (5 Code of Federal Regulations (CFR) 2635) or other Federal ethical obligations or policies regarding employee participation in scientific or data collection activities.

The principles described in the paragraphs below represent AMS SIP.

- AMS will ensure and maximize the quality, objectivity, utility, and integrity of the information the Agency collects and disseminates to its stakeholders.
- Where applicable, AMS will use OMB (*Standards and Guidelines for Statistical Surveys, September 2006*) best practices and guidance in conducting and releasing statistical survey information to the public regarding sampling methodology and data collection efforts.
- The Agency will maintain a firm commitment to data driven, science-based decision making that is free from political interference or inappropriate influence. When this information is considered, AMS will ensure that the underlying assumptions and uncertainties are taken into account and communicated during the process as well as undergo an independent peer review by qualified experts. Public release of data and reports without the required level of review, or without the inclusion of appropriate disclaimers, could be considered misconduct in violation of SIP.
- AMS will ensure that all established record retention schedules are followed and, if necessary, establish new schedules.

- AMS will ensure that senior level employees, within the appropriate disciplines and interests, are involved in the recruitment and selection of candidates for technical and scientific positions in AMS and that selections are based on the candidate's technical and scientific knowledge, credentials, experience, and integrity. Furthermore, these candidates and their supervisors will be held to the highest standard of professional and scientific ethics.
- AMS will ensure that any Federal Advisory Committee Act (FACA) committee that is tasked with giving scientific advice follow General Services Administration, FACA, and USDA Departmental Regulation (DR) 1041-001 guidelines and procedures as they relate to the recruitment process for new committee members. The process will be transparent, and committee member vacancies will be widely advertised, including publications in the Federal Register that encourage the public to recommend individuals for consideration.
 - a. Professional biographical information (including current and past professional affiliations) for appointed committee members will be made widely available to the public (e.g., via a Web site), and subject to Privacy Act and other statutory/regulatory considerations. Such information should clearly illustrate the individuals' qualifications for serving on the committee.
 - b. The selection of members to serve on technical or scientific FACA committees will be based on expertise, knowledge, and contribution to the relevant subject areas. Additional factors include, but are not limited to, the availability of the member to serve on the committee; diversity among members of the committee; and the ability to work effectively on an advisory committee. All Conflict of Interest waivers granted to committee members will be publicly available. Federal lobbyists are banned from serving on the committee.
 - c. All reports, recommendations, and products produced by the committee(s) will be treated solely as the findings of such a committee rather than the Agency and will not be subject to Agency revision.
- AMS employees will be encouraged to publish data and findings in peer-reviewed, professional, or scholarly journals that contribute to the mission of the Agency and its reputation for collecting market information and promoting marketing innovation. Employees must coordinate these activities with their AMS supervisors and AMS' Public Affairs staff.
- AMS employees will be encouraged to participate in professional or scholarly societies, committees, task forces, and other specialized bodies of professional societies, as appropriate. Such participation should be reviewed by the employee's supervisor and the AMS' Ethics Office to determine if it is appropriate for employees to be conducted in a personal or official capacity.
- AMS has in place the following mechanism to report and resolve violations of the SIP:

- a. The Agency will comprehensively investigate each allegation (whether by a formal submission to the Agency, an informal document, or by verbal communication) of misconduct while ensuring the rights and privacy of any party against whom the allegation is made. AMS will comply with the requirements of the Whistleblower Protection Act of 1989 (WPA), Public Law 101-12, and expanded protections enacted by Public Law 103-424.
 - b. The AMS Scientific Integrity Officer (ASIO) and/or AMS Research Integrity Officer (ARIO) will perform the initial review of allegations to evaluate the timing, content, and reasonableness of the allegation to determine if the allegation should be dismissed or proceed to the inquiry stage.
 - c. The ASIO and/or ARIO will notify the USDA Departmental Scientific Integrity Officer (DSIO) and/or USDA Research Integrity Officer (USDA RIO) of all allegations of violations of the USDA SIP received by the Agency, as applicable.
 - d. The ASIO may determine that a Review Panel (RP) of subject area experts will be assembled for initial fact finding. ASIO and/or ARIO will oversee the RP. The RP compiles and analyzes the factual record to determine the scope and impact of the alleged misconduct. The RP prepares a summary review with findings. At any time, the ASIO and/or ARIO or RP may refer the matter to the Office of Inspector General, if appropriate.
 - e. A final report will be sent to the Associate Administrator with recommendations as to corrective and disciplinary actions, as appropriate, in accordance with USDA personnel policies.
- Finally, the SI policy outlines the responsibilities of all AMS employees, cooperators, and contractors for upholding and implementing the principles embedded in this policy. It allows the Agency to address concerns regarding how the information was collected and interpreted in addressing scholarly, scientific, and program issues. Any loss of integrity in the decision-making process could undermine the Agency's reputation with program stakeholders, or weaken the Agency's ability to effectively conduct the business of the Agency. This SIP does not supersede USDA's SIP Handbook (DR 1074-001), but is designed to provide supplementary policies for a non-research organization in identifying and addressing information used by the Agency for policymaking and public release.