

NOAA Framework for Internal Review and Approval of Fundamental Research Communications

Part 1: Guidance for Line and Staff Offices on the internal
review of manuscripts to be submitted to the peer-reviewed
scientific literature

06/27/2013
NOAA Research Council
Executive Secretariat

Purpose

Free and open scientific communication is a fundamental element of the NOAA Scientific Integrity Policy (NAO 202-735D: Scientific Integrity)¹. At the same time, clearly communicating our science is an important responsibility of NOAA and its scientists. To achieve both open scientific communication and the high quality of that communication, the NOAA Research Council is issuing this guidance to the Line and Staff Offices (L/SOs) to develop procedures appropriate to their L/SO for internal review and approval of certain fundamental research communications but consistent with the framework established here.

This framework aims to ensure that NOAA manuscripts intended for the external peer-reviewed literature meet these basic standards of clarity and scientific integrity. L/SO procedures will require authors to respond to internal peer-review comments prior to submitting a manuscript for external publication. This framework is not intended, however, to inhibit publication by NOAA scientists, nor to prohibit NOAA scientists from freely expressing their opinions, scientific or otherwise. The framework provides an approved disclaimer for use by NOAA authors when expressing their opinions. Therefore, decisions to approve or not approve a work for submission to peer-reviewed publications will be based solely on the scientific merit of the work. This framework ensures the rights of NOAA authors will be protected both through specific L/SO procedures and in accordance with the NOAA Administrative Order (NAO) on Scientific Integrity.

These guidelines were developed by the NOAA Research Council per the principles in NAO 202-735D, which were deemed consistent with Department of Commerce rules (Department of Commerce Administrative Order on Public Communications, or DAO 219-1)² requiring NOAA to review Fundamental Research Communications³. These guidelines are also consistent with NAO 201-32G: Scientific and Technical Publications⁴.

We expect the need will arise to revise this framework in the future, as we learn through the implementation process. Please, therefore, provide suggestions and input regarding this framework to the NOAA Research Council Executive Secretariat at oar.rc.execsec@noaa.gov.

Applicability/Scope

This guidance applies to all NOAA Line and Staff Offices and to all NOAA (Federal) authors and co-authors, as well as NOAA contractors to whom NAO 202-735D applies, regardless of order of authorship. The guidance covers only manuscripts to be submitted to the peer-reviewed scientific literature, including manuscripts based on original data, literature reviews, and scientific opinions. The guidance does not cover non-federally led scientific assessments, such as WMO/UNEP Assessment Report on Stratospheric Ozone; National Research Council/National Academy of Sciences Reports; International Geosphere Biosphere Assessment and Report; and Intergovernmental Panel on Climate Change Assessment Report.

¹ NOAA Administrative Order on Scientific Integrity (202-735D): http://www.corporateservices.noaa.gov/ames/administrative_orders/chapter_202/202-735-D.html. The Administrative Order includes the definitions of terms, including a Fundamental Research Communication.

² Department of Commerce Administrative Order on Public Communications (219-1): http://www.osec.doc.gov/opog/dmp/daos/dao219_1.html

³ As noted in the next section, this guidance applies only to a sub-set of Fundamental Research Communications as defined in the Departmental Administrative Order. The NOAA Research Council may issue additional guidance for other types of Fundamental Research Communications.

⁴ NOAA Administrative Order on Scientific and Technical Publications (201-32G): http://www.corporateservices.noaa.gov/ames/administrative_orders/chapter_201/201-32G.html

Review Framework

The following framework describes the minimum review standard for all NOAA L/SOs. Each LO will develop its own review policy for Research Council approval based on and consistent with this framework. Each SO will have the option to develop its own review policy or to submit each of its manuscripts to the Research Council; the Research Council will then assign each manuscript to an appropriate L/SO to conduct the review.

Internal peer review and approval must be:

- consistent with NAO 202-735D on Scientific Integrity
- conducted by staff who are knowledgeable in the scientific area(s) being addressed in the work
- designed to improve the scientific quality of the work by highlighting any inconsistencies or weaknesses in data, methodology, findings, or structure of the manuscript prior to submission to the peer-reviewed scientific literature

Internal peer review shall not:

- be used to inhibit or excessively delay the publication of scientifically meritorious manuscripts, as described in NAO 202-735D, Section 7.03.

Additional Guidance:

- The review should last no longer than 30 days and should be completed in less time whenever possible. The length of time for review should be commensurate with the cycle time of the publication to which the manuscript will be submitted. Exceptions (e.g., complex or lengthy documents) requiring more than 30 days must be explained to the author in writing within 10 days of the manuscript entering the review cycle, such explanation to include an estimate of the time needed to complete the review.
- Reviewers may include both federal and non-federal employees. However, only federal employees may make recommendations regarding the nature of the communication (e.g., whether it is an FRC and if it contains policy or budget matters).
- A review should also note any instances that require the use of a disclaimer.

Using Disclaimers

Departmental policy requires the use of a disclaimer when the scientific conclusions presented in a manuscript could reasonably be construed as representing the view of NOAA or the Department when they do not.

NOAA policy requires the use of a disclaimer when a manuscript includes viewpoints, for example about policy or management matters that extend beyond the scientific findings to incorporate the author's expert or personal opinions.

In these cases, NOAA authors should use the following disclaimer in their manuscripts:

The scientific results and conclusions, as well as any views or opinions expressed herein, are those of the author(s) and do not necessarily reflect the views of NOAA or the Department of Commerce.

A determination as to whether a manuscript needs a disclaimer will occur as part of the review process.

Research Council Responsibilities

- The Council is responsible for the periodic review and updating of this policy.
- The Council is responsible for overseeing the effectiveness and implementation of these guidelines by the L/SOs.

Line/Staff Office Responsibilities

- Each NOAA LO is required to develop and document procedures for review and approval of manuscripts consistent with this framework. If an SO chooses to develop its own procedures they must be consistent with this framework.
- The L/SO procedures must include *time limits for review and approval*, as well as *procedures for redress* in cases where there is a dispute between an author and a reviewer that is consistent with the general timelines given here.
- L/SOs are required to present their procedures to the Research Council, through their Council representative, within 4 months of the approval of this framework and must make the procedures easily available and understandable to their staff.
- If a NOAA scientist is not a primary author on a manuscript, L/SOs may limit the review process to determine only if a disclaimer is warranted.
- The review process is only required to be completed by the office of one NOAA author, with notification to offices of any other NOAA authors. If the primary author is a NOAA scientist, his/her office should complete the review.

Approving Official Responsibilities

- The approving official (the Head of Unit – Lab/Program/Office Director or their designee) will assign one or more individuals, sufficiently knowledgeable in the relevant field, to review each manuscript. A chair or coordinator can be used when more than one reviewer is involved.
- The approving official will approve or disapprove manuscripts for release based on recommendations from the reviewer(s).
- The approving official will require the use of a disclaimer in the situations described above.
- The approving official will track all manuscripts submitted for review and approval from their unit.
- The approving official will not alter a manuscript without the consent of the author(s)

Reviewer/Review Coordinator Responsibilities

- The review will be conducted in a timely fashion.
- Reviewers will provide comments that are objective and consistent with the principles in NAO 202-735D.
- Reviewers can make recommendations to the author to improve the quality of the manuscript.
- The Chair or the Coordinator, if applicable, will make final recommendations to the approving official regarding approval or disapproval and the need for a disclaimer.

Author Responsibilities

- Authors must submit their pre-publication manuscripts to the approving official (the Head of Unit or his/her designee) for internal review and approval prior to first submission to the journal. This includes work where the NOAA employee is not a primary author. Manuscripts that are resubmitted to a journal after the journal's initial review decision do not need an additional NOAA review, unless the author believes the data, findings, or conclusions have changed significantly.
- If possible, the author should notify the approving official in advance of submitting a manuscript to allow time for the internal review process to be established, thereby facilitating speedy review.
- Authors must use a disclaimer in the appropriate situations (see disclaimer section above).
- Authors in organizations not covered by an approved L/SO policy should submit their manuscripts to the NOAA Research Council. The Research Council will then assign the manuscript to an appropriate L/SO to conduct the review under its policy.

Tracking and Reporting

Given the recommended "best practice" of keeping senior staff and public affairs informed about important scientific papers prior to their release, L/SOs will include a tracking and reporting component to their Internal Peer Review Guidance.

Procedures for Redress

While the NOAA Internal Peer Review process is required by Departmental Administrative Order 219-1 and NAO 202-735D, it must not be used as a tool to prohibit an author from publishing. L/SOs must, therefore, have clear written procedures in place to guide their staff in cases of disagreement during the review/approval process. In cases where there is a suspected violation of the NOAA Scientific Integrity Policy, the parties should follow the guidelines established in the Handbook⁵ for that Policy.

Effective Date/Revisions

This guidance will be in effect once approved by the NOAA Executive Council. The guidance may be reviewed/updated at the request of the NOAA Research Council Chair.

⁵ Procedural Handbook:
http://www.corporateservices.noaa.gov/ames/administrative_orders/chapter_202/Procedural_Handbook_NAO_202-735D_31Jan_2012.pdf

Appendix 1: Relevant Policy & Citations

NAO 202-735D: Scientific Integrity

4.06 - NOAA scientists are free to present viewpoints, for example about policy or management matters, that extend beyond their scientific findings to incorporate their expert or personal opinions, but in doing so they must make clear that they are presenting their individual opinions- not the views of the Department of Commerce or NOAA. In such cases, NOAA personnel may also note their NOAA affiliation as part of their biographical information, provided that their NOAA affiliation is noted as one of several biographical details, or, if the information is being published in a scientific or technical journal, their NOAA affiliation may be listed with an appropriate disclaimer. Appropriate disclaimers for use by NOAA scientists when expressing such opinions will be posted to the Scientific Integrity Commons website.

5.02.e - [NOAA will...] Ensure that data and research used to support policy decisions undergo independent peer review by qualified experts, where feasible, appropriate, and consistent with the law and NOAA's Information Quality and Peer Review Guidelines. In cases where a full external peer review is appropriate but not possible (e.g., emergencies where lives and property are at risk), NOAA staff may use modified peer review processes as necessary for timely decision-making and release of data and information. In these cases, NOAA will explicitly state that the information has not been peer reviewed.

7.03 - Decisions to approve or not approve a Fundamental Research Communication must be based only on whether the work is scientifically meritorious: specifically, whether the methods used are clear and appropriate; the presentation of results and conclusions is impartial; and there are no apparent, actual, or potential conflicts of interest. Consistent with DAO 219-1, the approval or non-approval of a Fundamental Research Communication cannot be based on the policy, budget, or management implications of the research. Differences of opinion will be resolved by through the NOAA-wide framework for review and approval of Fundamental Research Communications consistent with DAO 219-1.

7.04 - The NOAA Research Council will develop a NOAA-wide framework for peer review and approval of Fundamental Research Communications consistent with the criteria in 7.03. Each Line Office will develop and document procedures for review and approval consistent with the Research Council's framework. The procedures must include time limits for review and approval, and procedures for redress if the time limits are not met. The framework and procedures will be posted on the Scientific Integrity Commons website.

DAO 219-1: Public Communications

7.01 - Approval of Materials. Based on the operating unit's internal procedures, all written and audiovisual materials that are, or are prepared in connection with, a Fundamental Research Communication, must be submitted by the researcher, before the communication occurs, to the head of the operating unit, or his or her designee(s), for approval in a timely manner. These procedures may not permit approval or non-approval to be based on the policy, budget, or management implications of the research. The head of the operating unit, or his or her designee(s), is responsible for ensuring that, if appropriate, advance notice is provided to that unit's public affairs office.

7.03 - Scientific Conclusions. Given the nature of the scientific process, the role of the scientific community is to draw scientific conclusions based on available data. Department researchers may draw scientific conclusions based on research related to their jobs and may, subject to Section 7.01 with respect to any written or audiovisual materials, communicate those conclusions to the public and the media in a Fundamental Research Communication. However, if such a conclusion could reasonably be

construed as representing the view of the Department or an operating unit when it does not, then the researcher must make clear that he or she is presenting his or her individual conclusion and not the views of the Department or an operating unit.