

Southwest Fisheries Science Center (SWFSC) Review Policy for Fundamental Research Communications to the Public

A. Purpose

Free and open scientific communication is a top priority of the National Marine Fisheries Service (NMFS) and the National Oceanic and Atmospheric Administration (NOAA) and is fundamental to the work of the Southwest Fisheries Science Center (SWFSC). The purpose of this policy is to standardize procedures for internal review and approval of SWFSC Fundamental Research Communications (FRC) in accordance with the relevant NMFS and NOAA policies. Primarily, the policy aims to ensure that manuscripts intended for the external peer-reviewed literature meet basic standards of clarity and scientific integrity¹. The procedures also fulfill broader aims as required by NOAA policy including the requirement that authors respond to internal peer-review comments and receive Center approval prior to submitting a manuscript for publication as well as serving to keep Division and Science Center leadership informed.

Definitions and review requirements are outlined in the **Scope** section (B). Actions required by authors, supervisors, Division Directors and the Science Center Director are outlined in the **Responsibilities** section (C). **Disclaimers** and **Provisions for Recourse** are described in separate sections (D and E).

Correct affiliations for SWFSC authors and contractors are found in Appendix 1. Guidance regarding the cases in which the SWFSC author is not the lead author is described in Appendix 2. Author requirements post-acceptance are described in Appendix 3. A reference guide to the Fundamental Research Communications (FRC) covered in this document and subject to review and approval is listed in Appendix 4.

This policy applies to all SWFSC-employed authors and co-authors, SWFSC contractors, recipients of NOAA financial assistance awards, Cooperative Institute employees and others that use our affiliation, regardless of the order of authorship.

This policy is designed to be consistent with and derivative from the NMFS Policy on the Internal Review and Approval of Scientific Communications (NMFS PD 04-113), the NOAA Framework for Internal Review and Approval of Fundamental Research Communications, the NOAA Information Quality Guidelines and the NMFS Policy on the Information Quality Act, the NOAA Administrative Order on Scientific Integrity (NAO 202-735D), and the Department of Commerce Departmental Administrative Order on Public Communications (DAO 219-1).

For additional information not covered under the policies regarding fundamental research communication plan please see: The NOAA Plan for Increasing Public Access to Research

¹ Scientific Integrity is defined as “*The condition resulting from adherence to professional values and practices when conducting and applying the results of science that ensures objectivity, clarity, and reproducibility, and that provides insulation from bias, fabrication, falsification, plagiarism, interference, censorship, and inadequate procedural and information security*”;
http://www.corporateservices.noaa.gov/ames/administrative_orders/chapter_202/202-735-D.html

Results (PARR), the Department of Commerce Departmental Administrative Order on Public Communications (DAO 219-1) and Guidance of NOAA Employees Regarding Implementation and Interpretation of DAO 219-1.

B. Scope

This policy refers only to Fundamental Research Communications (FRC). “Fundamental Research Communication” is defined as public communication that deals with the products of basic and applied research science that are being made available to the public for the first time. This includes new data, results or interpretations that are being released, analyzed, explained or synthesized for public dissemination. For full definitions of the relevant terms and citations see Section 6. Departmental Public Communication in DAO 219-1 cited above.

All research communications by personnel affiliated with the SWFSC are subject to the following reviews:

- Technical quality
- Conformance with Information Quality Act (IQA)
http://www.cio.noaa.gov/services_programs/info_quality.html
- High profile and/or controversial content
- Policy and disclaimer

The SWFSC will use a single Fundamental Research Communication Review and Approval Form to certify all reviews. Exceptions to review requirements for specific types of communications are described below.

Communications to the public include, but are not limited to:

- Articles and letters in peer-reviewed journals
- Articles in professional journals that are not peer-reviewed (e.g. some foreign journals)
- Books (technical and popular)
- Books and encyclopedia chapters (technical or popular)
- Popular magazine articles
- NOAA Technical Memoranda SWFSC Administrative Reports, Cruise, Data and Field Season Reports made accessible to the public
- Letters to peer-reviewed journals
- Web pages with significant new data or research content made accessible to the public²
- Technical documents and working papers
- Letters to editor of a newspaper
- Newspaper articles (written by SWFSC authors, not Public Affairs)
- Book reviews
- Abstracts of verbal presentations and posters
- PowerPoint Presentations

² Continuously updated data and research products, such as publicly disseminated online databases should have their data collection and aggregation protocols and publication processes reviewed at least every 3 to 5 years or whenever there is a significant change in the protocol or process (NMFS PD 04-113-01, p. 4).

Exceptions to certain review requirements include:

- Reviews for technical quality are waived if the senior author (the most responsible NMFS author) is affiliated with another NMFS Center or NOAA Line Office and those entities conduct their own internal reviews. However, the SWFSC's Division Director (or designee) must sign the other three required reviews [(1) IQA, (2) high profile/controversial content and (3) policy and disclaimer].
- Reviews for technical quality are waived for technical documents and working papers tabled for discussion at meetings not accessible to the public.³
- The Division Director, or their designee, may conduct technical reviews for abstracts of verbal presentations and posters, book reviews, and news media articles or letters to the editor. However, the other three reviews are required: (1) IQA, (2) high profile/controversial content and (3) policy and disclaimer. Reviews for conformance with IQA are waived for submission to non-government peer-reviewed publications.
- Reviews for conformance with IQA are waived for communications that describe data, interpretations of data or information that has been previously disseminated.
- Reviews for conformance with IQA are waived for technical documents and working papers tabled for discussion at meetings that are not open to the public. (Meetings are considered "public" if the meeting is advertised in the Federal Register or if meeting documents are posted on publicly available websites).

C. Responsibilities

Author. Prior to submission for approval the senior SWFSC author (or co-author) is responsible for obtaining (in consultation with their supervisor) and responding to one internal technical review, if required. Items required for approval include:

- A revised, final draft of the manuscript in English with proper SWFSC affiliation
- Completed SWFSC Fundamental Research Communication Review and Approval Form signed by author and supervisor, Division Director and Science Center Director, or designees.

³ White papers or technical documents prepared for discussion at stock assessment workshops or other technical review meetings are of particular interest. (NMFS PD 04-113-01, p 9)

Public meetings. If the meeting is open to the public (i.e. advertised in the Federal Register) and/or the working documents are made available to the public (e.g., on a publicly available website), then this is considered a dissemination of the scientific information and the IQA applies. Because of this, the papers must go through at least "expedited" review (in which the Division Director (or designee) conducts the technical review) and the (1) IQA, (2) high profile controversial content and (3) policy and disclaimer reviews are completed ahead of the meeting.

Non-public meetings (e.g., ISC, IWC, CCAMLR). Conversely, if the meeting is not open to the public and the documents are released (disseminated to the public) after the meeting, the meeting itself can be considered adequate Technical review, pending approval by the Division Director. The (1) IQA pre-dissemination review, (2) high profile controversial content and (3) police and disclaimer review remain required prior to the dissemination of documents to the public.

Documents written at public and non-public meetings. Fundamental research communications developed as part of or during a publicly accessible workshop or working group meeting should be submitted for review at the termination of the meetings.

After the communication has been internally approved and submitted for publication, the author is required to track progress and report details including dates of acceptance (see Appendix I) and expected publication to the Division Director. Depending on the significance of the paper and/or the degree of controversy the author may be expected to assist with rollout plans including press releases.

Internal Technical Reviewer. The internal reviewer is chosen for their expertise in the subject matter and will review the paper as they would any scientific manuscript received for review from a professional journal. The reviewer is expected to review the assumptions, logic, methodology and scientific conclusions of the paper and to provide their review in writing to the author and to the supervisor who requested the review. If the appropriate expertise is not available within the Center, internal reviewers can be chosen from NMFS or from outside the agency.

Supervisor. Supervisors are expected to read and be knowledgeable of the content, scientific importance and policy implications of communications produced by their research programs before the author forwards the request for approval to the Division Director. The supervisor chooses the internal technical reviewer (in consultation with the author) and ensures that the internal review process was followed correctly and may request a second internal review. The supervisor ensures that author affiliations are correct. The supervisor mediates any disagreements between the author and reviewers and may return the manuscript to the author for additional revision. The supervisor signs the FRC clearance form after completing their review and when they are satisfied with the author's response to the reviewers.

Division Director. The Division Director is expected to read and be familiar with the content, scientific importance and policy implications of all communications produced by their division before signing the SWFSC Fundamental Research Communication Review and Approval Form. The Division Director reviews and certifies conformance with the Technical Review and IQA. She or he flags if the communication may be considered high profile and/or contains controversial content. The Division Director forwards the document and the SWFSC Fundamental Research Communication Review and Approval Form to the Director's Office for all documents listed in Appendix 4 requiring Science Center Director approval. The Science Center Director also signs off on any communications that are identified as high profile, may contain controversial content or policy statements, or may require a disclaimer. Otherwise, the Division Director can sign the SWFSC Manuscript Transmittal Form and the author may submit the communication for publication.

Director's Office. The Director's Office reviews the completed manuscript with particular attention to comments from the Division Director regarding scientific importance, high profile or controversial content, or policy implications and disclaimers. The Director's Office signs the High Profile and/or Controversy Content and Disclaimer sections of the SWFSC Fundamental Research Communication Review and Approval Form, alerts appropriate NMFS and NOAA offices and returns the form and manuscript to the author. If additional consideration is required, the manuscript may be returned to the Division Director. The Director's Office will also respond to requests from the senior author if they feel that the review and approval process is not moving

along swiftly or fairly within their Division. The Director's Office will track all manuscripts submitted for review and approval from SWFSC authors.

The normal timeframe for the review of the pre-submission packet from initial submission to the author's Division Director through the Director's Office and back to the author should be no longer than 30 days. If the paper is returned to the author for revisions that require re-review, the author should complete the revisions and resubmit to their Division Director or the Director's Office for approval. At this time, the 30-day time period begins once again. (See "Section E: Procedures for Recourse" below)

D. Disclaimers

Department of Commerce guidance (DAO 219-1) and NOAA Policy (NAO 202-735D) requires the use of a disclaimer when the communication contains statements that deal with issues of agency policy or management and the statements could reasonably be construed as representing the view of the Department or NOAA when they do not. In general, disclaimers are required when a communication goes beyond scientific conclusions or includes matters of policy, management, or budget. In such cases, the Center Director may require the following disclaimer:

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.

Examples of other situations where a disclaimer may be appropriate include:

- A lead SWFSC author does not wish to make changes suggested by the SWFSC internal review and decides to submit for publication a paper that did not receive approval by the Center Director. In this case, the SWFSC author may use his/her NOAA affiliation but must add a disclaimer. This also applies in situations where the paper was approved with the condition that a disclaimer be added.
- A non-NOAA senior author does not wish to make changes recommend by the SWFSC internal review. In this case, the junior author from SWFSC may use his/her NOAA affiliation but must add a disclaimer.
- An author does not wish to withdraw a policy statement that could reasonably be construed as representing the view of NOAA or the Department when it does not. In this case, the author may use his/her NOAA affiliation but must add a disclaimer.

E. Procedures for Recourse

If a communication from an author affiliated with SWFSC is not approved, the following policies and procedures apply [NMFS PD 04-113-01, page 13]:

- The author must either revise the work according to reviewer comments or make a convincing written rebuttal to the reviewer comments. Revisions and rebuttals must be reviewed and approved by the Division Director within 10 days of receipt.
- If the Division Director does not approve the revision or rebuttal, they must provide the reason(s), supported by clear examples, in writing to the author within the 10-day

timeframe. The author may then consult their direct supervisor whether to withdraw the work from the review process (which may include temporarily withdrawing the document then substantially revising it), or they may appeal to the Director's Office.

- The Director's Office must provide the author with a written decision approving or disapproving the work within 30 days of receipt of the appeal request. If the paper is returned to the author for revisions that require re-review, the author should complete the revisions and resubmit to their Division Director or the Director's Office for approval. At this time, the 30-day time period begins once again.
- If the work is not approved by the Director's Office, further appeal may be made to the NMFS Director of Scientific Programs and Chief Science Advisor. Author must provide all written materials associated with the work (e.g., revisions, rebuttals, and previous decisions). The NMFS Director of Scientific Programs Chief Science Advisor or Deputy Assistant Administrator for Regulatory Programs must provide to the author a written decision approving or disapproving the work within 60 days of receipt of the appeal.
- If all attempts to resolve the conflict result in disapproval of the work, the author may still submit the paper for peer-review and publication but must add a disclaimer.

The SWFSC review policy is not intended to prohibit an author from publishing. If there is a suspected violation of the NOAA Administrative Order on Scientific Integrity (NAO 202-735D), the procedures established in the Procedural Handbook for NAO 202-735D should be followed.

Appendix 1. NMFS Author Affiliations

The form and content of the affiliations are dictated by the NMFS Science Board. They are as follows:

For FTE (NOAA) employees:

[Division]
[Center or Office e.g., Southwest Fisheries Science Center]
National Marine Fisheries Service [Do not abbreviate]
National Oceanic and Atmospheric Administration [Do not abbreviate]
[street address, city, ZIP]
USA

For contract employees:

[Author(s)]
[Contracting Firm]
Under contract to [Center or Office e.g., Southwest Fisheries Science Center]
National Marine Fisheries Service
National Oceanic and Atmospheric Administration
[street address, city, ZIP]
USA

E.g., [Author]

Ocean Associates, Inc., under contract to Southwest Fisheries Science Center, National Marine Fisheries Service, National Oceanic and Atmospheric Administration, 8901 La Jolla Shores Drive, La Jolla, CA 92037

For Cooperative Institute and other grantees:

[Author(s)]
University or home institution (e.g., UC Santa Cruz)
Cooperative Institute or other granting organization (e.g., CIMEC)
Award number
Optional:
Affiliated with [Center or Office e.g., Southwest Fisheries Science Center]
National Marine Fisheries Service
National Oceanic and Atmospheric Administration
[street address, city, ZIP]
USA

OR

[Author(s)]^{1,2}

¹University of California, Santa Cruz
Cooperative Institute for Marine Ecosystems and Climate (CIMEC)
Award number: 123456

²Southwest Fisheries Science Center
National Marine Fisheries Service
National Oceanic and Atmospheric Administration
110 Shaffer Road, Santa Cruz, CA 95060, USA

For graduate students:

[Author(s)]

University

Optional:

Affiliated with [Center or Office e.g., Southwest Fisheries Science Center]

National Marine Fisheries Service

National Oceanic and Atmospheric Administration

[street address, city, ZIP]

USA

Visiting scientists:

[Author(s)]

[Home institution]

Optional:

Affiliated with [Center or Office e.g., Southwest Fisheries Science Center]

National Marine Fisheries Service

National Oceanic and Atmospheric Administration

[street address, city, ZIP]

USA

Notes:

- (1) All NOAA federal employees must use the SWFSC affiliation as their primary affiliation if the work was completed during NOAA-funded work time. Additional affiliations are allowable.
- (2) The journal may shorten the affiliation for purposes of publication. If they do so, first abbreviate National Oceanic and Atmospheric Administration to NOAA. If further abbreviation is required, abbreviate National Marine Fisheries Service to NMFS.
- (3) Non-FTE scientists (contractors, grantees, graduate students visiting scientists) can use SWFSC as their secondary affiliation using the variations described above

Appendix 2. Lead authorship. The table below provides guidance for completing pre-submission review and approval depending on authorship position of the SWFSC scientist.

Lead author (institution)	Does the SWFSC author need to obtain and respond to an internal technical review?	Does the paper need SWFSC's Fundamental Research Communication Review and Approval Form?	Comments
SWFSC	Yes	Yes	
NMFS lead author (lead author is not from the SWFSC)	No	Yes, the manuscript must be reviewed by the author's supervisor, Division Director (and as appropriate Science Center Director) and all other sections must be completed (without reviewers' names)	The most senior SWFSC author is expected to verify that another NOAA Line Office or NMFS Center is conducting internal technical review
Non-NMFS	Yes	Yes	SWFSC coauthor is responsible for ensuring that all internal pre-submission review and/or notification comments are addressed and resolved with the lead author
Non-NMFS lead author with a "more senior" NMFS author on the author list	No	Yes, the manuscript must be reviewed by the author's supervisor, Division Director (and as appropriate Science Center Director) and all other sections must be completed (without reviewers' names)	The most senior SWFSC author is expected to verify that another NOAA Line Office or NMFS Center is conducting internal technical review; assumes other Line/Staff offices have a similar review process

Appendix 3. Post Submission Requirements for Authors

A. Manuscript accepted for publication

When a paper is **accepted** for publication in peer-reviewed journals and NOAA Tech Memos, the author must report the following information to the Division for inclusion in the SWFSC Weekly Report. Particular attention should be drawn to those that are of high scientific importance, are highly controversial, and/or will have a formal press release.

Please follow this exact format when submitting accepted publications

- Name of journal or publication
- Acceptance date
- Expected publication date
- Authors with NOAA authors indicated in bold plus affiliation (e.g., **First and Last Name, NMFS/SWFSC**)*
- Title of paper
- Abstract from paper
- Link to electronic version of paper (if applicable)
- Significance of scientific conclusions for management, policy or to the broader scientific community (three bullets or less)
- Degree of controversy (high, medium, low). If medium or high, state why.
- Press release (yes or no)
- Rollout plan (yes or no)

*Example: **Charles Darwin (NMFS/SWFSC)**

B. Manuscript published

When a paper is **published**, author must submit the citation to the Division for inclusion in the SWFSC Weekly Report, as well as an electronic version (PDF) to SWFSC.Publications@noaa.gov for distribution. “Published” refers to when the paper is first available to the public, either online or in print.

Appendix 4: Reference Guide to SWFSC Fundamental Research Communication Review and Approval

	Technical Review ¹	Information Quality Act ²	Policy Statements and Disclaimers	High Profile/Controversial	Final signature
	signed by: Division Director or designee	signed by: Division Director or designee	signed by: Science Center Director or designee	signed by: Division Director or designee	
Manuscript submitted to peer reviewed journals	yes	no (external review serves as IOA review)	yes	yes	Science Center Director
Manuscripts in professional journals that are not peer-reviewed (e.g., some foreign journals)	yes	yes	yes	yes	Science Center Director
Books (technical or popular)	yes	yes	yes	yes	Science Center Director
Book and encyclopedia chapters (technical or popular)	yes	yes	yes	yes	Science Center Director
Popular magazine articles	yes	yes	yes	yes	Science Center Director
NOAA Tech Memos	yes	yes	yes	yes	Science Center Director
Letters to peer-reviewed journals	yes	yes	yes	yes	Science Center Director
Web pages with significant new data that are accessible to the public ⁴ :	yes	yes	yes	yes	Division Director ³
Cruise reports summarizing methods and reporting data made accessible to the public	yes	yes	yes	yes	Division Director ³
SWFSC Administrative Reports	yes	yes	yes	yes	Division Director ³
Manuscripts submitted for "expedited" review (the Division Director conducts the technical review)⁵:					
Letters to the editor of a newspaper	Division Director	yes	yes	yes	Science Center Director
Newspaper articles (written by our authors, not those written by Public Affairs)	Division Director	yes	yes	yes	Science Center Director
Book reviews	Division Director	yes	yes	yes	Division Director ³
Stock assessments and working papers (e.g., manuscripts presented at scientific meetings such as PFMC, SRG, STAR, IWC, ICES, PICES, etc)	Division Director	(6)	yes	yes	Division Director ³
Abstracts for oral presentations or posters (e.g., professional society conferences and scientific meetings)	Division Director	yes	yes	yes	Division Director ³
PowerPoint presentations (e.g., for professional society conferences, scientific meetings)	Division Director	yes	yes	yes	Division Director ³
(1) The technical reviewer, chosen by supervisor in consultation with author, is knowledgeable about the subject matter. The reviewers may be chosen from within the author's Division, another Division, from NMFS or outside the agency as appropriate for expertise.					
(2) IOA is not needed if the Division Director determines that the document does not contain new data, new interpretations of data, new information that has not had peer review that meets IOA standards; IOA is not needed if the Division Director determines that the document contains data information that has been previously disseminated; when in doubt, fill it out.					
(3) The Division Director reviews the manuscript unless he/she deems manuscript to be high profile or controversial, then elevates to Science Center Director for review and approval.					
(4) Continuously updated data and research products, such as publicly disseminated online databases should have their data collection and aggregation protocols and publication processes reviewed at least every 3 to 5 years or whenever significant changes are made. Technical Review completed by Division Director or designee; no internal reviewer required.					
(5) Technical review completed by Division Director or designee; no other internal reviewer required.					
(6) If the meeting is not open to the public, the meeting itself can be considered adequate peer review; if a document is written at the meeting, then it needs to go through Center review and approval after the meeting.					