

# Office of Research Integrity & Compliance Annual Update

ORIC January 2026

Caren Frost

AVP Research Integrity & Compliance



# Agenda

- Consider unit activities from 2025
- Examine national compliance context
- Explore top compliance & integrity issues
  - AI
  - Research misconduct
  - Researcher burden
- Discuss next steps for ORIC for 2026
  - Maintain consolidated compliance and sharing



# 2025 Compliance Landscape

- Expansion of digital and AI-driven research
- Increasing national and global regulations (data, ethics, funding, governance)
  - 200+ Executive Orders for 2025
- Preliminary consideration of predictive compliance
- Expectation to reduce compliance burden while increasing integrity and trust in research activities and data

# AI Governance & Transparency

- AI in research and compliance introduces auditability and bias risks
  - Introduces potential for undisclosed data and/or issues with traceability of data origins
- Beginning in 2025
  - Journals began to mandate AI-use disclosure
  - Journals and funders began to check for AI-use
- Need for AI guidance/policies in research and with data use as well as specific training for researchers
  - [ai.utah.edu](https://ai.utah.edu)

# Impact on Updated Misconduct Rules

- U.S. Office of Research Integrity issued new federal rule that shifts documentation and reporting (2025)
  - Concern over fabricated (AI-generated) data or ghostwriting (using AI)
- Expectation is for institutions to update policies and provide training



# Compliance Program Analytics

- Cover compliance activities through indirect costs as well as recharge models
- Move to data-driven monitoring to enhance compliance activities
- Developing compliance and integrity dashboards for ORIC as well as for colleges and departments

# Decrease Researcher Burden

- UU is decentralized (40% PI time spent on compliance)
  - Have many systems for compliance and integrity
  - Consider how to decrease administrative load in colleges and departments
- Consider how to consolidate platforms and simplify workflows for all in research and research administration

# Next Steps

- Draft an institutional compliance roadmap (2026–2030)
- Enhance researcher support & training
- Conduct periodic audits and benchmarking



# Conflict of Interest

COI Director, Emily Ostrander



# Conflict of Interest Office (COI)

The mission of the Conflict of Interest Office is to support innovation and research at the University of Utah through effective management of financial conflicts of interest to protect the integrity of our community.

We oversee conflicts of interest in research, scholarly or educational activity, and transactions.

The COI Office performs over 25,000 reviews annually and serves over 10,000 employees.

We offer expedited reviews! Our initial response time is usually less than 1 day!

Email us at [COI@utah.edu](mailto:COI@utah.edu)

In 2025, software for the Business Relationship Reporting (“BRR”) financial disclosure system was upgraded. The revised system has increased data security and offers enhanced functionality over time.

We are preparing for a future transition to software which will replace the ERICA system.

# “Gold Standard Science” & COI

The Trump Administration’s Gold Standard Science is defined as science conducted in a manner that is reproducible, transparent, communicative of error and uncertainty, collaborative and interdisciplinary, skeptical of its findings and assumptions, structured for falsifiability of hypotheses, subject to unbiased peer review, accepting of negative results as positive outcomes, and without conflicts of interest.

*No major policy changes have been yet made at this time, but agencies are working now to implement unified measurement frameworks to evaluate compliance (some utilizing AI features).*

- *For example, conflict-of-interest tools to better track researchers for vetting of conflicts of interest and persistent identifiers for researchers*
- *Unified NIH Funding Strategy* prioritizing “scientific merit”

*At this time, it’s unclear whether federal agencies will begin to solicit disclosure of ‘personal’ conflicts of interest, as the current focus is financial conflicts of interest.*

# “Make America Healthy Again” & COI

The ‘Make America Healthy Again’ (“MAHA”) Commission Report discusses conflicts of interest in the context of competing agency agendas, industry donations affecting the integrity of agencies, review panelists holding conflicts of interest (even related research funding could be construed as a conflict of interest), and overprescribing medications “driven by conflicts of interest in medical research, regulation, and practice.”

*No major policy changes have been yet made at this time, but this could represent an expansion of federally regulated areas in this domain beyond the current focus of individual financial conflicts.*

# “The Bayh-Dole Act” & COI

Established by US Congress in 1980, this legislation (also known as Amendments to the Patent and Trademark Act) granted institutions right to commercialize intellectual property resulting from federal funding.

There is a renewed focus of debate regarding this law with one recent proposal from the Commerce Secretary Howard Lutnick suggesting that taxpayers should receive half the profit from university patents.

***This could represent a drastic shift in how higher education institutions fund their tech transfer offices and nuance the types of intellectual property conflicts.***

# Public Access Policy



# Developments

- 2024 NIH Public Access Policy (effective on manuscripts after 7/1/2025)  
<https://grants.nih.gov/policy-and-compliance/policy-topics/public-access/nih-public-access-policy-overview>
- 2026 NSF Public Access Policy (effective on awards after 1/22/26)  
<https://www.nsf.gov/policies/document/pappg24-1-supplement-2>
- Contact Compliance Specialist  
[Gabrielle.Matinkhah@utah.edu](mailto:Gabrielle.Matinkhah@utah.edu)

# Institutional Biosafety Committee

IBC Director, Debbie Eckert



# Institutional Biosafety Committee (IBC) Updates

## 2025 Oversight Tasks

- 199 IBC registrations
- 413 Laboratory inspections
- 2766 Completed biosafety trainings
- 1055 Hepatitis B vaccine program enrollees

## Federal Regulatory Landscape

- NIH Biosafety Oversight Modernization
- E.O. 14292 – Gain of Function

[biosafety@ehs.utah.edu](mailto:biosafety@ehs.utah.edu)

<https://ibc.utah.edu/>

801-581-6590



# NIH: Modernizing Biosafety Oversight

- NIH Guidelines first released 50 years ago
    - Established IBCs
    - Regulate research with rsNA
  - “Effective, transparent, modern”
    - Reduce red tape for low-risk research
    - Expand oversight beyond rsNA, align with risk
    - Empower IBCs
  - **YOU** can participate in the process
    - Save the dates:
      - NIH Listening Session: February 12
      - U of U Prep Session: February 2
        - 1-2p, RAB Rm 117
- RSVP for Monday’s Prep Session!
- <https://www.signupgenius.com/go/805054AA9A92AA64-61189361-biosafety>



## On-Demand Commenting



Let the NIH know how you think Biosafety Oversight should be modernized!

<https://osp.od.nih.gov/help-modernize-and-strengthen-the-oversight-of-biosafety/>

# EO 14292: Improving the Safety and Security of Biological Research

- **Dangerous gain-of-function research** enhances the pathogenicity or transmissibility of an infectious agent or toxin, resulting in significant societal consequences.

Examples:

- Increasing harmful consequences, host range, or environmental stability
  - Evading immunity or countermeasures
  - Recreating eradicated/extinct agents
- NIH and USDA implementation notices
  - Awaiting new oversight frameworks

# Institutional Review Board

IRB Director, Annie Snow



# 2025 Update

- AAHRPP reaccreditation
- No FDA mandate for Single IRB
- Draft HHS guidance (open for comment)
- Fewer grant-funded projects
- Additional requirements from federal funding sources
- FDA and IRB-issued IND exemptions
- New FDA Guidance
- New Associate Director
- Updated IRB website

# 2026 Plans

- Continue building bridges with University research community
- FDA proposed rulemaking, HHS updates
- Continuing Panel C (Community)
- Developing new REd classes
- Launching AAHRPP CAN Connect
- Replacing Social/Behavioral Vice Chair



**Join the IRB Listserv!**

# Office of Animal Care & Compliance (OACC)

OACC Director, Amanda Flitton



# 2025 Office of Animal Care & Compliance (OACC) Activities

- Serves as the administrative and regulatory support for the Institutional Animal Care and Use Committee (IACUC)
- Maintains the University's compliance with applicable federal, state, and University laws and guidelines for the care and use of research animals
- Provides investigators and animal care and use personnel with the appropriate training and guidance concerning these regulations

## 2025 OACC Highlights

- 341 laboratory outreach visits conducted. Resulted in a 28% decrease in deficiencies noted during semi-annual inspections
- 1,739 action items processed (protocols, amendments, etc.)
- 123 congruency reviews conducted
- 266 continuing reviews conducted



OACC Office  
801-581-5950  
[iacuc@oacc.utah.edu](mailto:iacuc@oacc.utah.edu)



# 2025 Notifications & Changes

- In 2025, NIH issued multiple announcements affecting animal research
- New initiative aimed at prioritizing human-based research approaches and reducing dependence on animal models
  - Organoids, tissue chips, computational models
  - NOFOs no longer issued exclusively supporting animal models (encourage human-focused approaches)
- Notifications from the Office of Laboratory Animal Welfare (OLAW) and other relevant policy changes impacting animal research
  - Aug 27, 2025: NIH updated OLAW Guidance Disclaimer (NOT-OD-25-145), reminding compliance with PHS Policy, the Guide, and applicable laws.
  - Sept 25, 2025: NIH updated policy on allowable costs for animals (NOT-OD-25-163), permitting charges for rehoming/retirement of experimental animals (effective Oct 1, 2025).

# 2025 Notifications & Changes

- Notification from the Animal Care and Use Review Office (ACURO)
  - ACURO Policy Change: DoD-funded animal research cannot share protocols with projects funded by other sources (e.g., NIH, NSF, private grants).
  - Effective Date: Applies only to NEW and DE NOVO protocols submitted on or after Jan 1, 2026.

# What this means for researchers

- Justify Animal Use: Show how chosen models (animal or NAMs) support translational relevance
- Explore Alternatives: Demonstrate plans to reduce, refine, and replace animal models
- Broaden Approach: Future funding will prioritize human-focused methods alongside animal models
- Adapt Applications: Review new funding announcements for updated requirements and adjust proposals
- Existing DoD Protocols: No immediate action; separate protocol required at next triennial review
- New DoD Protocols (Jan 1, 2026+): Must submit as standalone protocol, separate from other funding sources

# Office of Quality Compliance (OQC)

OQC Director, Trent Foxley



# Office of Quality Compliance (OQC)

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Provides **guidance, education** and **resources** to research teams and scholars across the University to promote responsible and ethical conduct of research

# Office of Quality Compliance (OQC)

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## Self-Assessment Review

- Self-Guided review of study records
- Diversely Valuable tool
- Initiated through ERICA or by OQC



## ClinicalTrials.gov

- PIs are the record owners
- Department PRS Administrators
- Institutional oversight by OQC



**ENSURE COMPLIANCE!**

# Research Education

REd Director, Jesse Morris



# Research Education (REd)

*Provides comprehensive and accessible training and resources to promote innovation, collaboration, and scientific integrity for the University of Utah's research enterprise*

Visit our homepage to view upcoming classes ...



<https://education.research.utah.edu/>



## RED 739 | Responsible & Ethical Conduct of Research - Refresher Course

This course is for those who have previously completed their RECR Certificate. Federal agencies require updated trainings at least every 4 years, and this 2 hour course is designed to fulfill that requirement.

During this 2 hour session, we will review the main tenets of responsible and ethical conduct of research, as well as dive into some case studies and discussions.

**Date:** Friday, January 30, 2026  
**Time:** 1:00 - 3:00 pm  
**Location:** Zoom

[REGISTER HERE](#)

[NIH RCR requirements](#)



# Research Security

Research Security training is required by NIH, NSF, and USDA.

REd provide three ways to complete to complete this training!

**1. RED 367 | Research Security Training**

*All research personnel*

**1. CITI Research Security Training**

*All research personnel*

**2. Molecular Biology (MBIOL 7570)**

*Graduate Students*



**RESEARCH EDUCATION**  
THE UNIVERSITY OF UTAH





# Artificial Intelligence: AI Basics Intensive



Class focuses on safe and ethical use of AI in the research context

Content developed in collaboration with leaders and experts

Freely available and accessible to all UofU faculty, staff and students



### AI IN GRANT WRITING AND RESEARCH APPLICATIONS

*By Penny Atkins  
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The use of artificial intelligence (AI) tools can enable research innovations and advancements, simplify the process of preparing for and writing grant proposals, and decrease the burden of research administration. When using AI within your research process, it is important to consider the benefits and potential risks, such as the unintended disclosure of data and how to ensure that the output is accurate, reliable, and unbiased.

This module provides an overview of the considerations for AI use in grant writing and other research applications. Detailed information on the tools and technologies available, and the guidelines and policies around AI use at the University of Utah can be found on our campus AI webpage ([ai.utah.edu](https://ai.utah.edu)). Researchers should also be aware of the guidelines or policies of other entities they engage with, such as federal funding agencies.



**AI Support for the Research Lifecycle**

The University of Utah provides guidance for the use of AI in research, and each of these considerations can be reframed for grant writing and research applications:

- Accountability:** Confirm the accuracy of any generated text or other materials before use and ensure compliance with existing standards, policies, and approved uses.
- Procurement:** When possible, use approved AI tools (<https://ai.utah.edu/ai-tools>) for new tools. Follow established procurement and purchasing processes.
- Security:** Ensure that your use of AI does not violate any human rights or other protections, such as trade secrets, patents, or Intellectual Property.





### AI AND PUBLISHING AGENCIES

*By Allyson Mower  
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As with the rest of the world, publishers grappled with the release of OpenAI's Chat GPT in late 2022. Many saw the tool and others like it for its potential to write material, while also recognizing that it was built using existing content. Publishers understood that if a machine could write, there was potential for fewer incentives for humans to continue creating, given the heavy lift required to produce new works of authorship, both emotionally and financially. (As we all know, it is hard to write something original AND something good)

As of present, no publishers permit authors to use generative AI to write or create content. Yes, AI authored content exists, but it is all self-published. A few publishers have embraced AI for use in their internal workflows to develop approaches to marketing and metadata descriptions. Most publishers allow AI for copyediting both internally and by authors, but no publishers (trade or scholarly) currently allow authors to use AI in generating and drafting content for books, journal articles, scripts, presentations, or artwork.

This will most likely remain the status quo primarily because copyright ownership, as established by the U.S. Copyright Act, can only vest in people and not computers or machines (or animals for that matter even though elephants and apes have proved quite creative). But it is also because of the trusted role authors play in the scholarly communication system and within our society.

To understand this restriction on AI and authoring, one must first firmly grasp the concepts inherent in authorship, which include originality, responsibility, and authority. In academic authorship, many people contribute to various aspects of a work. Those listed as authors include

people who contributed to writing or creating a portion of the work and those who understand the full scope of the work, the data that it represents, how the inquiry was developed, and how the research was conducted and analyzed.

While generative AI can produce language meaningful to humans – an amazing power – it is unable to know how a researcher or a research team developed a line of inquiry, why the researchers designed it in the way they did, nor how the research project was conducted and analyzed. Those very human components of the research and scholarship process is what gets reflected in authorship. And that's what's also reflected in authorship policies in publishing agencies. If you or your research team use AI for copyediting, great! If you relied on AI to generate any data used in your research, include that in your acknowledgments section. Don't list AI as one of your authors and refrain from the temptation to use generative AI to write any portion of the work, including the abstract. Use generative AI to improve your original writing instead and marvel at its ability to do so and then acknowledge and disclose its use. (No AI was used in the writing of this brief)






# ORICle

## Office of Research Integrity & Compliance

### Newsletter



<https://integrity.research.utah.edu/newsletter.php>



# Resource for Genetic and Epidemiologic Research (RGE)

RGE Director, Jahn Barlow



# RGE

RGE was established by Executive Order of the Governor of Utah as a “data resource for the collection, storage, study, and dissemination of medical and related information” for “the purpose of reducing morbidity or mortality, or for the purpose of evaluating and improving the quality of hospital and medical care.”

The University of Utah administers RGE to facilitate appropriate access and responsible use of the Utah Population Database by research and public health projects.



# RGE 2025

## Projects/Reviews

- 255 active projects, 19 new projects
- 69 manuscripts/abstracts submitted to RGE for review

## Agreements

- New five-year agreement with Utah Department of Health and Human Services

## Privacy

- Utah's Governmental Data Privacy Act (GDPA)
  - Utah Data Governance Summit
  - Privacy Plan

# RGE 2026

## New initiatives

- AI platform for UPDB
- Discovery phase of new electronic administration system (ERICA replacement)

## Compliance

- Create a system to track data agreements for all RGE projects

## Data Sharing

- Draft NIH Controlled-Access Data Policy and Proposed Revisions to NIH Genomic Data Sharing Policy

# Research Misconduct

RIO Director, Zach Mitchell



# Research Misconduct

## Misconduct Oversight

Lead efforts to uphold research integrity through receipt of research misconduct allegations and advancing research policies

## 2025 Case Data

28 complaints

- 8 Assessment (8/28; 29%)
  - 4 Inquiry (4/8; 50%)
    - 1 Finding of Research Misconduct (1/4; 25%)

Of 8 Assessments

6 Plagiarism;

4 Falsification/Fabrication

# Policy Development



- Revisions Effective 1/1/2026;
- Required to comply with updated PHS policy;
- NSF PAPPG Supplement



- Draft undergoing review by indigenous groups;
- Revised NAGPRA;
- Smithsonian Shared Stewardship and Ethical Return



- To be submitted February 2026;
- Supports new research security regulations and initiatives;
- Promotes research rigor and integrity

# Other Integrity & Compliance Activities

## LabFigures Pilot

- Software for research figure creation and processing
- Guided by standards for ethics and rigor
- Free to University employees and students

## LabFigures

A user-friendly website to create research figures.

### Services

- Track representative images and replicates
- Make simple adjustments to brightness and contrast
- Easily document image processing
- Quickly adjust color channels
- Quantify intensity measurements
- Intuitive collation and labelling

### Pricing - Free!

The pilot test of this software is free to University of Utah and Huntsman Cancer Institute employees and researchers

### Getting Started

- Visit [labfigures.com](http://labfigures.com) and create your account with [unid@utah.edu](mailto:unid@utah.edu)
- PIs can invite lab members
- Watch the tutorial videos

*For questions please contact:*

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# Research Participant Advocacy

RPA Director, Sadie Gabler



# Office of Research Participant Advocacy

Advocate for research participants by providing support and resources for successful participation



## **Advocate:**

Develop and implement strategies to ensure all community members have access and opportunity to research at the U.



## **Support Research Participants:**

Serve as a comprehensive resource and advocate for individuals involved in or considering research participation, providing them with the necessary information, support, and representation.



## **Identify and Eliminate Barriers:**

Conduct thorough assessments to identify obstacles to research participation and work collaboratively with stakeholders to remove barriers, fostering an all-encompassing research participant pool.

# ORPA 2025 Overview:

## Language Access Services (LAS):

**Translated: 754 documents** (78% new study docs) total of **1,498,338 words** (36% increase in words translated from 2024).

**Interpreter Support: 305 research encounters** ( 21% ) **Total of 280 Spanish language encounters** (up from 156) .

**111 New Studies** utilized translation and interpreter services in 2025.

**513 unique research studies** supported since 2020. (w/ a 28% increase from 2024)

## Participant Advocate Support:

**301 Interactions in 2025, (43% increase from 2024)** Support included healthy volunteers seeking research opportunities, study-specific inquiries, concerns, and study team support

**StudiesForYou: 20,000 active users** with an **average engagement of 3 mins each** in 2025

## Outreach Highlights:

**Utah Parent Center Family Fest at Tracy Aviary w/ 600+ Attendees**

**Utah Rural Health Conference – Stakeholder Engagement w/ 300+ attendees**

**U of U Southern Regional Medical Campus Open House**

## Additional Achievements:

**2 Poster presentations – International DIA Conference** and **Utah Rural Health Association Conference** – Supporting access and increasing generalizable knowledge through ORPA efforts.



# Office of Research Integrity & Compliance Units

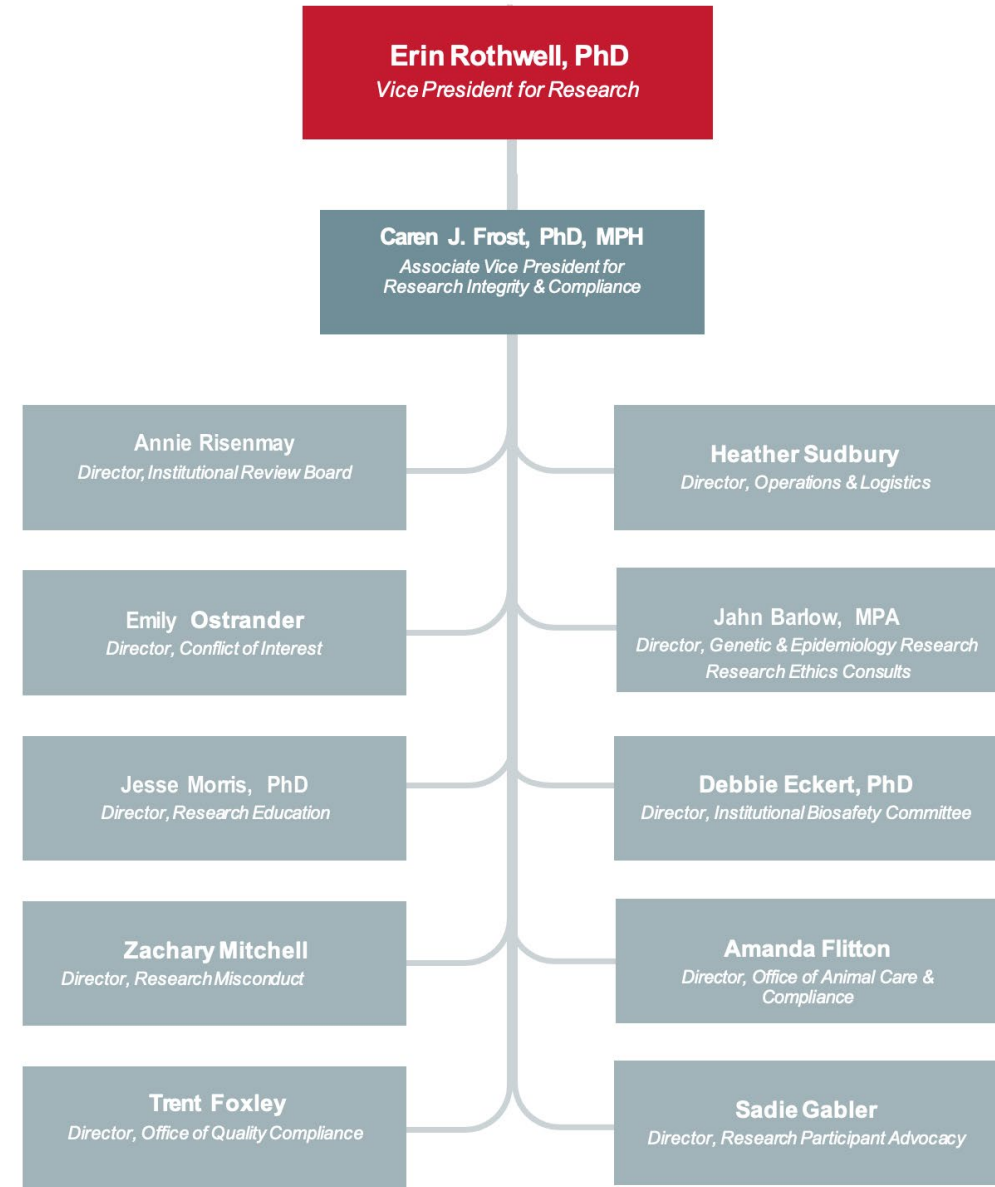
Heather Sudbury  
Director, ORIC operations & Logistics



# ORIC Units

Office of Research Integrity & Compliance - Research Integrity and Compliance - The University of Utah

## ORIC ORG CHART



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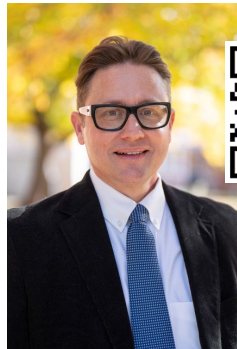
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**Caren Frost**  
Associate Vice President  
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**Heather Sudbury**  
Director, Operations & Logistics

**Thank you**

