

NOAA Framework for Internal Review and Approval of Fundamental Research Communications

to accompany NOAA Administrative Order 202-735D: Scientific Integrity

NOAA Research Council

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I. Purpose

Free and open scientific communication is essential to NOAA's research enterprise and a foundation of NOAA's Scientific Integrity Policy (NAO 202-735D: Scientific Integrity).¹ Additionally, maintaining quality standards and clearly communicating our work to the public is an important responsibility of NOAA and our 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 Fundamental Research Communications (FRC) that are consistent with the framework established here.

These guidelines were developed by the NOAA Research Council per the principles and requirements found in NAO 202-735D (Scientific Integrity); Department of Commerce Administrative Order on Public Communications (DAO 219-1)² and the Information Quality Act.³ These guidelines will be revised as needed. Suggestions and input regarding this framework may be submitted to the NOAA Research Council Executive Secretariat at oar.rc.execsec@noaa.gov.

II. Scope

II.1 Applicability

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. This guidance applies to all Fundamental Research Communications (FRC) as defined in DAO-219-1. The DAO defines an FRC as any communication, regardless of avenue of dissemination, or method of presentation that:

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. See also DAO 219-1 for the complete definition of 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 Information Quality Act (section 515 of Public Law 106–554; H.R. 5658) and the OMB IQA Guidelines (67 FR 8452 (Feb 22, 2002)) <https://www.whitehouse.gov/sites/default/files/omb/fedreg/reproducible2.pdf>

“is intended for, or should reasonably be expected to have, broad distribution outside the U.S. Government,...relates to the Department’s programs, policies, or operations and takes place or is prepared officially⁴ ... and deals with the products of basic or applied research in science or engineering, the results of which ordinarily are published and shared broadly within the scientific community, so long as the communication does not contain information that is proprietary, classified, or restricted by federal statute. If a communication also includes matters of policy, budget, or management, then it is not a Fundamental Research Communication.”

For purposes of this guidance, NOAA further includes within the definition of an FRC the products of basic or applied research in social science and policy research, the results of which ordinarily are published and shared broadly with the scientific community (so long as the communication does not contain information that is proprietary, classified, or restricted by federal statute). These products should be subject to the same review and scientific integrity standards as any other fundamental research communications.⁵

This guidance applies to any initial public release of an FRC regardless of the method of publication or dissemination. This includes, but is not limited to: material prepared for conferences and seminars; audiovisual works, including PowerPoint slides for conference presentations; manuscripts to be submitted to the peer-reviewed scientific literature, including literature review papers; technical reports or memoranda; and web pages with new research content.

II.2 Exceptions

Certain research communications are not covered by this Framework. These include, but are not limited to:

- Continuously updated data and research products, such as publicly disseminated online databases. These products should have their data collection and aggregation protocols

⁴ See DAO 219-1, Section 6.03a for the definition of official communications.

⁵ These products should be subject to the same review and scientific integrity standards as any other fundamental research communications. For example, a research paper published in a peer-reviewed journal discussing the economic impacts of a Catch Shares fishery management program, is an FRC even though the papers will necessarily discuss fisheries management policy. It should be noted that DAO 219-1 only allows for FRCs and Official Communications. Without this exception many social science journal papers would be considered official communications, and would need to be reviewed and cleared through the communications office, which would be inappropriate for this type of work.

and publication processes reviewed at least every 3 to 5 years or whenever there is a significant change in the protocol or process

- Social media products, such as blogs, are covered under the Department of Commerce Policy on the Approval and Use of Social Media and Web 2.0 (SM/W2.0).
- Contributions by NOAA scientists to non-federally led scientific assessments that undergo extensive external peer review, such as the WMO/UNEP Assessment Report on Stratospheric Ozone; National Research Council/National Academy of Sciences Reports; the International Geosphere Biosphere Assessment and Report; and Intergovernmental Panel on Climate Change Assessment Reports.

Questions about applicability of the Review Framework to other research communications should be raised at the Line Office level, and directed to the NOAA Research Council, in consultation with the NOAA Scientific Integrity Officer.

III. Review Framework

III.1 General

The following framework describes the minimum review standard for all NOAA FRCs⁶. NOAA Line offices, except OMAO, (NWS, NMFS, OAR, NOS, and NESDIS) will develop their own internal review and approval policy based on and consistent with this framework. NOAA staff offices and OMAO have the option to develop their own internal review policy for FRCs, or to submit each of its FRC's to the Research Council Executive Secretariat, who will then assign each FRC to an appropriate line office to conduct the review.

Due to the iterative and collaborative nature of science, the extent of internal review required by the L/SO should give due consideration to the intended audience, the novelty and complexity of the science to be reviewed; the avenue of publication; and the extent of prior peer review. L/SO procedures may wish to implement expedited review processes for some types of FRC. For example, conference presentations may only require general content review by the author's immediate supervisor. Conversely, high profile and potentially controversial papers intended for external peer reviewed journals may require a more detailed internal technical review.

Internal review and approval must be:

⁶ The OMB Information Quality Act Guidelines define "Influential Scientific Information" (ISI) as information that agency reasonably can determine will have or does have a 'clear and substantial' impact on important public policies or private sector decisions. This type of FRC is subject to more stringent peer review and reporting requirements that are beyond the scope of this guidance. For more information about IQA please see appendix 2.

- Conducted by the author's head of operating unit or their designee for review⁷
- Designed to confirm that the communication meets the definition of an FRC.
- Appropriate for the intended audience and the nature of the FRC. At the discretion of the L/SO certain FRC's (such as presentations prepared for discussion at a scientific conference) may be subject to general content review and approval.
- Constructed to note any instances that require the use of a disclaimer (see section Using Disclaimers below).
- Designed to improve the scientific quality of the work by highlighting any inconsistencies or weaknesses in data, methodology, or findings presented.
- Technical reviews will be conducted by staff that are knowledgeable in the scientific area(s) being addressed in the work.
- Consistent with NAO 202-735D on Scientific Integrity.
- Constructed to ensure that the FRC meets the Information Quality Act standards of utility, integrity and objectivity (see Appendix 2).

Internal review must not:

- Be used to inhibit or excessively delay the dissemination of scientifically meritorious FRCs, as proscribed in NAO 202-735D, Section 7.03.
- Prohibit NOAA scientists from freely expressing their opinions, scientific or otherwise in a communication. To protect open and free communication, the framework provides an approved disclaimer (see section III.2 Using Disclaimers below) for use by NOAA authors when expressing their opinions in an FRC. Additionally, NOAA authors have the ability to communicate as private citizens, subject to provisions in DAO 219-1 governing Non-Official Communications of Interest⁸.

⁷ DAO 219-1 requires that FRC be submitted to the employee's head of operating unit, or their designee for review.

⁸ Non-Official Communications of Interest: DAO219-1 requires advance notice and review of materials for publications and presentations by employees that are prepared non-officially and without the use of government resources, if the subject matter of the communication is within the scope of NOAA's programs, policies or operations. Advance notification should be given to the employee's head of operating unit, or their designee and any relevant materials should be submitted. This review is not for approval or disapproval, and the agency may not prohibit the publication. The review is only for agency awareness, and to ensure that the publications do not contain confidential information, violate ethics rules or improperly attribute personal views of the employee to NOAA or the Department. A disclaimer is required if the publications could reasonably be construed as representing the views of the Department, NOAA or an operating unit.

- Exceed 30 calendar days from the time the FRC is submitted by the author to the appropriate reviewing official. Reviews should be completed in less time whenever possible. Furthermore, Line Offices may wish to implement an expedited review process for some publication types such as presentation slides for conferences. Conversely, some publications may require more than 30 calendar days to complete the review process (e.g. due to the complexity or length of the document). In these cases the reviewing official must provide a written explanation to the author within 10 calendar days of receipt of the FRC for review, along with an estimate of the time needed to complete the review. If unavoidable delays arise after the initial ten days the author must be notified and provided a written explanation for the delay as soon as possible. If delays are viewed to be excessive this may be addressed through the LO procedures for redress described below (Section III.4).

III.2 Using Disclaimers

Detailed guidance regarding the use of disclaimers is the purview of L/SOs and should be clearly articulated in L/SO policy on internal review. Use of a disclaimer does not exempt an FRC from internal review.

At a minimum, Departmental policy requires the use of a disclaimer when the scientific conclusions and viewpoints presented in a FRC could reasonably be construed as representing the view of NOAA or the Department when they do not.⁹ NOAA policy requires the use of a disclaimer when a FRC includes personal viewpoints, for example, if the material contains policy or management matters that extend beyond the scientific findings to incorporate the author's expert or personal opinions.¹⁰

When appropriate, and consistent with L/SO policy, NOAA authors should use the following disclaimer in their FRCs:

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.

⁹ See DAO 219-1, Section 7.03.

¹⁰ See NAO 202-735D, Section 4.06.

III.3 Additional Guidance

III.3.1 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.

III.3.1 Line/Staff Office Responsibilities

Each NOAA line office is required to develop and document procedures for review and approval of Fundamental Research Communications consistent with this framework. If a staff office 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 6 months of the approval of this framework and must make the procedures easily available and understandable to their staff.

III.3.2: Line and staff office policies:

- Line and staff office policies must be consistent with this guidance, DAO 219-1, and the Information Quality Act.
- The extent of peer review required should give due consideration to the novelty, and complexity of the subject matter to be reviewed; the avenue of publication; the extent of prior peer review and the relevance of the information to decision making. Line office policies may provide for varying levels of review based on FRC type.
- Line and Staff office policies must be clear on roles and responsibilities timelines, for authors, approving officials, and any others involved in the review and approval of an FRC. This is particularly important if L/SOs provide varying levels of review for different types of FRCs or if the designation of responsibility varies by FRC type.
- Line and staff office policies should clearly outline redress and dispute resolution procedures for the FRC Review process. Responsibilities for authors, approving officials and others involved should be clearly described.
- DAO 219-1 requires that the FRC be submitted to the employee's head of operating unit, or their designee for review. L/SO policies may specify different designees for different FRC types.
- Peer 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 of which the identified approving official should be notified)..
- A review should determine if a disclaimer should be used.
- Multiple reviews are not required for cases where a single FRC is being presented in multiple venues.

- 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 FRC is undergoing review by another Federal agency, a NOAA review for policy and disclaimer concerns is still required. However the technical review may be completed by the alternate agency, at the discretion of the NOAA approving official

III.3.3 Approving Official or Designee 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 provide technical review (if required) for an FRC. A chair or coordinator can be used when more than one reviewer is involved, as may be the case with complex or potentially controversial FRCs.
- The approving official may assign the technical review to themselves, if they have sufficient background in the scientific subject of the work, and if the novelty, complexity, potential controversy and significance of the work do not warrant broader review.
- The approving official will approve or disapprove FRC for release based on recommendations from the reviewer(s).
- The approving official will determine if a disclaimer is required.
- The approving official will not alter a FRC without the consent of the author(s).

III.3.4 Reviewer/Review Coordinator Responsibilities

- The review will be conducted in a timely fashion, within the 30 calendar day limit to complete the review and approval process.
- 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 FRC.
- The Chair or the Coordinator, if applicable, will make recommendations to the approving official regarding approval or disapproval and the need for a disclaimer.

III.3.5 Author Responsibilities

- Authors must submit their pre-publication FRC to the approving official (the Head of Unit or his/her designee) for internal review and approval *prior to first submission* to the journal or other outlet. This includes work where the NOAA employee is not a primary author.
- FRCs that are submitted to a journal and then rejected or sent back by the journal for revision, do not need to go through a second round of approval before they are resubmitted to the journal unless the data, findings, or conclusions have changed significantly.
- Authors must use a disclaimer in the appropriate situations as determined by the approving official.

- Authors in organizational units not covered by an approved line or staff office policy should submit their FRC to the NOAA Research Council, Executive Secretariat. The Research Council Executive Secretariat will then assign the FRC to an appropriate L/SO to conduct the review under its policy.

IV. Procedures for Redress

While the NOAA Internal Review process is required by DAO 219-1, the Information Quality Act, and NAO 202-735D, it must not be used as a basis 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. These procedures should be consistent with DAO 219-1 and this framework.

In cases where there is a suspected violation of the NOAA Scientific Integrity Policy, the parties should follow the guidelines established in the Procedural Handbook¹¹ for dealing with allegations of misconduct that accompanies the Scientific Integrity Policy (NAO202-735D).

v. Tracking and Reporting of Scientific Publications

It is important to keep senior staff and public affairs informed about important scientific papers prior to their release. As such, L/SOs will include a tracking and reporting component to their Internal Peer Review Guidance for manuscripts intended for the External Peer Reviewed Literature as well as for other significant Technical Memoranda or Scientific Reports.

a. Author Affiliation and Attribution

Using clear, consistent author affiliations enables NOAA to recognize and track research publications from the various laboratories and offices. In turn, this enables NOAA to assess the relevance and impact of its research portfolio. The following examples

¹¹ [Procedural Handbook for dealing with allegations of misconduct:
http://www.corporateservices.noaa.gov/ames/administrative_orders/chapter_202/Procedural_Handbook_NAO_202-735D_31Jan_2012.pdf](http://www.corporateservices.noaa.gov/ames/administrative_orders/chapter_202/Procedural_Handbook_NAO_202-735D_31Jan_2012.pdf)

For FTE (NOAA) employees:

[Division]
[Center, Office or Laboratory] (e.g., Pacific Marine Environmental Laboratory)
[Line/Staff Office] (e.g. Oceanic and Atmospheric Research)
National Oceanic and Atmospheric Administration
[street address, city, ZIP]
USA

Contractors should not use NOAA as primary affiliation. An example:

[Author(s)]
[Contracting Firm]
Under contract to [Center, Office or Laboratory]
[Line/Staff Office]
National Oceanic and Atmospheric Administration
[street address, city, ZIP]
USA

Cooperative Institute and other grantees should not use NOAA as primary affiliation. An example:

[Author(s)]
[University or home institution]
[Cooperative Institute or other granting organization] (e.g., Sea Grant)
Award number

Visiting scientists should not use NOAA as primary affiliation. An example:

[Author(s)]
[Home institution]
Visiting Scientist at [Center, Office or Laboratory]
[Line/Staff Office]
National Oceanic and Atmospheric Administration
[Street address, city, ZIP]
USA

Each author is responsible for ensuring that this policy is followed for his or her publication, including checking that the correct affiliation is included in final publication proofs.

If a particular external publication does not permit the format above due to space constraints or other limitations, acronyms are permitted. The name of the smallest organizational unit should be written in full. However, NOAA and line office affiliations are not to be omitted. Following are acceptable abbreviations of the affiliation:

NOAA, [acronym for line/staff office], [acronym for laboratory], [full name of division or sub-office], [city, state, and zip code of author]

NOAA, [acronym for line/staff office], [full name of laboratory or office], [city, state, and zip code of author]

VI. 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.

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.

- 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.

- 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.

Appendix 2: Information Quality Act Summary

Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554, aka the Data Quality Act or Information Quality Act) directed the Office of Management and Budget (OMB) to issue government-wide guidelines that “provide policy and procedural guidance to federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by federal agencies.” (67 FR 8452 (Feb 22, 2002))

The guidelines apply to a wide variety of government information products and all types of media, including printed, electronic, broadcast, or other. The guidelines define “information” as “any communication or representation of knowledge such as facts or data, in any medium or form, including textual, numerical, graphic, cartographic, narrative, or audiovisual forms.” For example, this definition includes information that an agency disseminates from a web page. The guidelines define “dissemination” as “agency initiated or sponsored distribution of information to the public.” Explicitly not included within this term is distribution limited to “government employees or agency contractors or grantees; intra- or inter-agency use or sharing of government information; and responses to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act or other similar law.” It also does not include distribution limited to correspondence with individuals, press releases, archival records, public filings, subpoenas, or adjudicative processes.

The IQA gives agencies a fair bit of flexibility in developing their own guidelines, but it does require agencies to: “develop a process for reviewing the quality (including the objectivity, utility, and integrity) of information before it is disseminated.” This pre-dissemination review is to “enable the agency to substantiate the quality of the information it has disseminated through documentation or other means appropriate to the information.” The IQA defines the components of quality as utility, integrity and objectivity. Together these standards form the basic review requirements of the IQA.

Utility is the usefulness of the information to its intended users. “Useful” means that the content of the information is helpful, beneficial, or serviceable to its intended users, or that the information supports the usefulness of other disseminated information by making it more accessible or easier to understand, obtain, or use.

Objectivity covers both presentation and substance, requiring that the Information is presented in an accurate, clear, complete, and unbiased manner, and in proper context. The substance of the information must also be accurate, reliable, and unbiased; in the scientific, financial, or statistical context. Original and supporting data are generated and

the analytical results are developed using sound, commonly accepted scientific and research methods.

Integrity refers to the security of information—protection of the information from unauthorized access or revision, to ensure that the information is not compromised through corruption or falsification.

The OMB Information Quality Act Guidelines further define “Influential Scientific Information” (ISI) as information that agency reasonably can determine will have or does have a ‘clear and substantial’ impact on important public policies or private sector decisions. This type of publication is subject to more stringent peer review and reporting requirements, and is also held to a higher standard of reproducibility and transparency. These standards are further elaborated in the OMB Peer Review Bulletin¹² (PRB) that was published subsequent to the IQA Guidelines.

The Peer Review Bulletin further defines the peer review requirements for ISA and also defines Highly Influential Scientific Assessments (HISA). HISA are a subset of influential scientific information. A HISA is

a scientific assessment that: (i) has a potential impact of more than \$500 million in any one year on either the public or private sector (the economic test); or (ii) is novel, controversial, or precedent setting, or of significant interagency interest (the narrative test). HISAs have even more stringent peer review and documentation requirement requirements. For more information on the specific requirement please refer to the NOAA Information Quality Guidelines found here: http://www.cio.noaa.gov/services_programs/info_quality.html

Both ISI and HISA require that a peer review plan be developed and posted on the agency’s website¹³. The determination as to whether an information product is ISI or a HISA should be made early in the process of developing the information so that a peer-review plan can be developed and posted well in advance of the release of the information.

Additionally, the OMB IQA guidelines include an important exception to the review requirements:

“an agency does not “initiate” the dissemination of information when a federally employed scientist or federal grantee or contractor publishes and communicates his or her research findings in the same manner as his or her academic colleagues, even if the federal agency retains ownership or other intellectual property rights because the federal government paid for the research. To avoid confusion

¹² http://www.cio.noaa.gov/services_programs/pdfs/OMB_Peer_Review_Bulletin_m05-03.pdf

¹³ NOAA Peer Review Plans are posted here:
http://www.cio.noaa.gov/services_programs/prplans/PRsummaries.html

regarding whether the agency agrees with the information (and is therefore disseminating it through the employee or grantee), the researcher should include an appropriate disclaimer in the publication or speech to the effect that the “views are mine, and do not necessarily reflect the view” of the agency.

From this exception, publications in peer reviewed journals and presentations at scientific conferences are not subject to IQA review if they include a disclaimer. ISI and HISAs do not qualify for this exemption. However, it is important to note that DAO-219-1 requires an internal review of all Fundamental Research Communications. So even though they are exempt from IQA review, these publications are still subject to review under the DAO.