



California University of Pennsylvania

POLICY: Responding to Allegations of Research Misconduct

A. Purpose & Scope

This policy provides the members of California University of Pennsylvania with a framework for reporting, investigating, and adjudicating suspected incidents of research misconduct in a fair and consistent manner. The policy is intended to promote the principles of professional integrity, prevent research misconduct and ensure that instances of misconduct are discovered, investigated and censured as needed.

It is also intended that any such action be in accordance with applicable federal and state law as well as the Collective Bargaining Agreement (CBA) between the Association of Pennsylvania State College and University Faculties (APSCUF) and the Pennsylvania State System of Higher Education (PASSHE). In the event of a conflict between this policy and federal and state law, federal and state law shall control. In the event that there is a conflict between these policies and an applicable CBA, the CBA will take precedence.

This policy is intended to apply to all research including federal, state, local and private grant opportunities. This policy applies to allegations of research misconduct (as the term is defined below) involving:

1. A person who, at the time of the alleged research misconduct, was an employee or student of the University or an agent of, or was affiliated by contract or other agreement with California University. This includes faculty, administrators, staff, graduate students and undergraduate students. It applies to all individuals engaged in the research enterprise.
2. Any research proposed, performed, reviewed, or reported, or any research record generated from that research, regardless of whether an application or proposal for funds resulted in a grant, contract, cooperative agreement, or other form of support.

This policy and the associated procedures apply to undergraduate or graduate students' course work only if related to a sponsored program or research.

B. Definitions

1. Allegation: A disclosure of possible research misconduct through any means of communication. The disclosure may be by written or oral statement or other communication to an institutional or grantor official.
2. Collective Bargaining Agreement (CBA): The agreement between the Association of Pennsylvania College and University Faculties (APSCUF) and the Pennsylvania State System of Higher Education (PASSHE) or any other applicable CBA covering PASSHE employees.
3. Complainant: A person who in good faith makes an allegation of research misconduct.

4. Deciding Official (Deciding Officer): The institutional official who makes the determinations on allegations of research misconduct and recommends institutional administrative actions. At California University, this will be the President or the President's Designee. When the Deciding Officer is someone other than the President, the investigation of the allegations of misconduct will be pre-disciplinary. At no time will the Deciding Officer be the Research Integrity Officer.
5. Disciplinary Action: Action against an individual found guilty of misconduct is at the discretion of the Deciding Official (Deciding Officer). Disciplinary Action sanctions may include (1) placement of a record of reprimand in the individual's personnel file, (2) termination, (3) notification of criminal authorities, and/or (4) disclosure of the investigation outcome to funding agencies, journal editors, professional societies, licensing boards, potential employers and others who request references. Disciplinary Action sanctions for students are listed in the respective Academic Integrity Policy for undergraduate or graduate students.
6. Evidence: Any document, tangible item, or testimony offered or obtained during a research misconduct proceeding that tends to prove or disprove the existence of an alleged fact. Examples of evidence include data reports, proposal documents, and correspondence.
7. Good Faith: As applied to a complainant or witness, means having a belief in the truth of one's allegation or testimony that a reasonable person in the complainant's or witness's position could have based on the information known to the complainant or witness at the time. An allegation or cooperation with a research misconduct proceeding is not in good faith if it is made with knowing or reckless disregard for information that would negate the allegation or testimony. Good faith as applied to a committee member means cooperating with the purpose of helping an institution meet its responsibilities under any federal or state law or contractual obligation. A committee member does not act in good faith if his/her acts or omissions on the committee are dishonest or influenced by personal, professional, or financial conflicts of interest with those involved in the research misconduct proceeding.
8. Grantor: The person or entity that is supplying funds, goods or services in support of the research conducted pursuant to this policy.
9. Inquiry: Preliminary information-gathering and preliminary fact-finding as to whether an allegation or apparent instance of violation of responsible conduct of research warrants an investigation. When applicable, it shall meet the criteria and follow the procedures of 42 Code of Federal Regulations (CFR) §§ 93.307-93.309.
10. Institutional Counsel: The University Legal Counsel who represents the institution and who is responsible for advising the Research Integrity Officer, the inquiry and Investigation Committees, and the Deciding Official on relevant legal issues.
11. Institutional member: A person who is employed by, is an agent of, or is affiliated by contract or agreement with California University. Institutional members may include, but are not limited to, officials, faculty, support staff, researchers, students, volunteers, agents, and contractors.
12. Investigation: The formal development of a factual record and the examination of that record leading to a decision
13. Preponderance of the evidence: Proof by information that, compared with that opposing it, leads to the conclusion that the fact at issue is more probably true than not.

14. Research Integrity Officer: The California University official responsible for: (1) assessing allegations of research misconduct; and (2) overseeing inquiries and investigations. The Dean of the School of Graduate Studies and Research will be the Research Integrity Officer who will have primary responsibility for implementation of the institution's policies and procedures on research misconduct.
15. Research Misconduct: Fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results. *Fabrication* is making up data or results and recording or reporting them. *Falsification* is manipulating research materials, equipment, or processes, or changing or omitting data or results such that the research is not accurately represented in the research record. *Plagiarism* is the appropriation of another person's ideas, processes, results, or words without giving appropriate credit. Research misconduct may include other practices that seriously deviate from those that are commonly accepted within the scholarly community for proposing, conducting, or reporting research.
16. Research Misconduct Proceeding: Any actions related to alleged research, including but not limited to, allegation assessments, inquiries, investigations, oversight reviews, hearings and administrative appeals.
17. Research record: The record of data or results that embodies the facts resulting from research inquiry, such as data, document, computer file or any other account that may provide evidence or information regarding the research that constitutes the subject of an allegation. Examples of research record contents include grant applications, journal articles, research notes, manuscripts, equipment use logs, and consent forms.
18. Respondent: The person against whom an allegation of research misconduct is directed or who is the subject of a research misconduct proceeding. There can be more than one respondent in any inquiry or investigation.
19. Retaliation: An adverse action that affects the employment or other status of an individual because the individual has, in good faith, made an allegation of violations of scientific misconduct or of an inadequate institutional response thereto, or has cooperated in good faith with an investigation of such allegation including, but not limited to, being a witness or committee member.

C. Policy

1. Responsibility to Report Misconduct

Every member of the California University community has the responsibility of reporting misconduct in scholarly research. All institutional members will report observed, suspected, or apparent research misconduct to the Research Integrity Officer. Any official who receives an allegation of research misconduct must report it immediately to the Research Integrity Officer.

It is generally recognized in academia that an accusation of misconduct in scholarship and/or research is among the most serious charges that can be leveled against a scholar/researcher. No person raising good faith allegations of misconduct will suffer any penalty. However, frivolous, mischievous or malicious misrepresentation in alleging misconduct will not be tolerated, and may result in action against the perpetrator.

2. Cooperation with Research Misconduct Proceedings

Institutional members, including Respondents, will cooperate with the Research Integrity Officer and other institutional administrators in the review of allegations and the conduct of inquiries and investigations. Institutional members, including Respondents, have an obligation to provide evidence relevant to research misconduct allegations to the Research Integrity Officer or other institutional officials. This process shall be in accordance with any and all applicable Collective Bargaining Agreements.

3. Confidentiality

The University will make reasonable and good faith efforts to maintain the confidentiality of inquiries unless to do so would compromise public health and safety or impede its ability to carry out a thorough inquiry or investigation.

The Research Integrity Officer shall limit disclosure of the identity of respondents and complainants, and limit disclosure of any records or evidence, to those who need to know in order to carry out a thorough, competent, objective and fair research misconduct proceeding. The Research Integrity Officer should use written confidentiality agreements or other mechanisms to ensure that the recipient does not make any further disclosure of identifying information.

The respondent, complainant, and others consulted during an investigation are all responsible for maintaining confidentiality and cooperating with the conduct of an inquiry and investigation.

4. Protecting Complainants, Witnesses, and Committee Members

Institutional members may not retaliate in any way against complainants, witnesses, or committee members. Institutional members should immediately report any alleged or apparent retaliation against complainants, witnesses or committee members to the Research Integrity Officer who shall review the matter and, as necessary, make all reasonable and practical efforts to counter any potential or actual retaliation. Disciplinary action may be taken for retaliation.

As requested and as appropriate, the Research Integrity Officer and other institutional officials shall make reasonable and practical efforts to protect or restore the reputation of persons alleged to have engaged in research misconduct, but against whom no finding of research misconduct is made.

During the research misconduct proceeding and upon its completion, regardless of whether the institution determines that research misconduct occurred, the Research Integrity Officer will undertake reasonable and practical efforts to protect the position and reputation of, or to counter potential or actual retaliation against, any complainant who made allegations of research misconduct in good faith and of any witnesses and committee members who cooperate in good faith with the research misconduct proceeding.

If relevant, the Deciding Officer will determine whether the complainant's allegations of research misconduct were made in good faith, or whether a witness or committee member acted in good faith. If the Deciding Officer determines there was an absence of good faith he/she will determine whether any administrative action should be taken against the person who failed to act in good faith.

5. Interim Administrative Actions and Notifying Grantor of Special Circumstances

Throughout the research misconduct proceeding, the Research Integrity Officer will review the situation to determine if there is any threat of harm to public health, human or animal subjects, or the integrity of the supported research process, or risk of loss of federal, state or private funds and equipment. Likewise the Research Integrity Officer will monitor the situation to ensure there is no indication of possible violations to the law, that the proceeding not be made public prematurely, or that the rights and interests of those involved are safeguarded. In the event of a threat, the Research Integrity Officer will, in consultation with other institutional officials and Grantor pursuant to legal or contractual requirements, take appropriate interim action to protect against any such threat consistent with applicable laws, university policy, and any relevant collective bargaining agreements. Interim action might include, but not be limited to, additional monitoring of the research process, reassignment of personnel, additional review of research data and results, or delaying publication.

6. In Case of Resignation of the Respondent

If the Respondent, without admitting to the misconduct, elects to resign his or her position after the institution receives an allegation of research misconduct, the assessment of the allegation will proceed, as well as the inquiry and investigation, as appropriate based on the outcome of the preceding steps. If the Respondent refuses to participate in the process after resignation, the Research Integrity Officer and any inquiry or Investigation Committee will use their best efforts to reach a conclusion concerning the allegations, noting in the report the Respondent's failure to cooperate and its effect on the evidence.

7. Process and Timeline

Once an accusation of research misconduct has been made, the University will take no more than twenty business (20) days to conduct a preliminary inquiry (unless the Research Integrity Officer determines that a longer period is warranted) and to determine whether a more complete investigation is warranted. If an investigation is to be undertaken, it will begin within thirty (30) days of the conclusion of the inquiry and conclude within sixty (60) days. The institution will then take a maximum of thirty (30) days to finalize the report and make a decision on the disposition of the case. The Research Integrity Officer is responsible for keeping the Deciding Officer and others who need to know apprised of the progress of the review of the allegation of research misconduct.

D. Procedure(s)

1. Filing Allegations of Research Misconduct

Individuals who believe that misconduct may have been committed are asked to schedule an appointment with the Research Integrity Officer to discuss the matter. A written complaint is not required.

If an individual is unsure whether a suspected incident falls within the definition of research misconduct, he or she may meet with or contact the Research Integrity Officer to discuss the suspected research misconduct informally, which may include discussing it anonymously and/or hypothetically. If the circumstances described by the individual do not meet the definition of research misconduct, the Research Integrity Officer may refer the individual or allegation to other offices or officials with appropriate responsibilities.

The complainant is responsible for making allegations in good faith, maintaining confidentiality, and cooperating with the inquiry and investigation.

Based on the conversation with the complainant, the Research Integrity Officer will prepare an initial report of alleged misconduct. The accuracy of this report must be attested to by a statement signed by the complainant. The respondent is then notified that a complaint has been lodged, notified of the nature of the complaint, and told the procedures to be followed. This process will be consistent with applicable collective bargaining agreements.

2. Conducting the Assessment and Inquiry

a. Initiation and Purpose of the Inquiry

Upon receiving an allegation of research misconduct, the Research Integrity Officer will immediately assess the allegation to determine whether it is sufficiently credible and specific so that potential evidence of research misconduct may be identified. If the Research Integrity Officer determines that the criteria for an inquiry are met, he or she will initiate an inquiry process. This inquiry process is to be relatively informal, discrete and timely.

An inquiry does not require a full review of all the evidence related to the allegation. The purpose of the inquiry is to conduct an initial review of the available evidence to determine whether to conduct an investigation. The inquiry will not result in a final conclusion about whether misconduct occurred or who was responsible, but rather will separate unfounded allegations from those of a more substantive nature. The Research Integrity Officer conducts the inquiry in order to make a recommendation to the Deciding Officer of whether misconduct occurred.

b. Inquiry Process and Inquiry Report

At the time of or before beginning an inquiry, the Research Integrity Officer must make a good faith effort to notify the respondent in writing of the allegations. The Research Integrity Officer is responsible for ensuring that respondents receive all the applicable policies and procedures of the institution or the grantor that are the subject of the inquiry.

The Research Integrity Officer must take all reasonable and practical steps to obtain all the research records and evidence needed to conduct the research investigation, to inventory the records, and to sequester them in a secure manner. In the conduct of this inquiry, the Research Integrity Officer may consult, on an ad hoc basis, with institutional members of his/her choice. The obtaining and sequestration of records shall begin at the time notice of the inquiry is provided to the respondent. Every effort is made to safeguard confidentiality, individual reputations, and the integrity of the research. When appropriate, the Research Integrity Officer may give copies of the records to the respondent or provide the respondent supervised access to the records. When appropriate, the Research Integrity Officer may also provide copies of the records, subject to the inquiry, to other researchers who may be continuing to work on the project.

The Research Integrity Officer will normally interview the complainant, the respondent, and key witnesses as well as examining relevant research records and materials. Respondents that are represented by a union may consult with a Union Representative and may bring a Union Representative to interviews or meetings pertaining to the inquiry. As a matter of good practice, the complainant, respondent, and key witnesses should be provided a summary of the interview for correction, addition or deletion. Then, the Research Integrity Officer will evaluate the evidence and decide whether an investigation is warranted.

The Research Integrity Officer shall notify the respondent whether the inquiry found an investigation to be warranted, include a copy of the draft inquiry report for comment within five (5) days of completion. A confidentiality agreement should be a condition for access to the report. The respondent shall have five (5) days to comment.

A written inquiry report must be prepared that includes the following information: (1) the name and position of the respondent; (2) a description of the allegations of research misconduct; (3) a list of the research records reviewed and summaries of any interviews; (4) the basis for recommending or not recommending that the allegations warrant an investigation; (5) any comments on the draft report by the respondent or complainant. Institutional Counsel should review the report for legal sufficiency.

The respondent should be given the opportunity to admit that research misconduct occurred and that he/she committed the research misconduct. With the advice of the Research Integrity Officer and institutional legal counsel, the Deciding Officer may terminate the institution's review of an allegation that has been admitted if the institution's acceptance of the admission and any proposed settlement is approved by the Grantor.

c. Inquiry Decision and Notification

The Research Integrity Officer will transmit the final inquiry report and any comments to the Deciding Officer, who will determine in writing whether an investigation is warranted. The inquiry is completed when the Deciding Officer makes this determination.

Within five (5) calendar days of the Deciding Officer's decision that an investigation is warranted, the Research Integrity Officer will provide the Grantor, if required by law or contract, with the Deciding Officer's written decision and a copy of the inquiry report. The Research Integrity Officer will also notify those institutional officials who need to know of the Deciding Officer's decision.

If the Deciding Officer decides that an investigation is not warranted, the Research Integrity Officer shall secure and maintain for seven (7) years after the termination of the inquiry sufficiently detailed documentation of the inquiry to permit a later assessment by sponsoring agencies having a legitimate interest in them.

The Research Integrity Officer will notify the respondent of the outcome of the inquiry, and provide the respondent with a copy of the inquiry report. The Research Integrity Officer will also notify the complainant of the outcome of the inquiry.

d. Time for Completion of Inquiry

The inquiry, including preparation of the final inquiry report and the decision of the Deciding Officer on whether an investigation is warranted, should be completed within twenty (20) calendar days of initiation of the inquiry, unless the Research Integrity Officer determines that circumstances clearly warrant a longer period. The respondent will be notified of any extension.

3. Conducting the Investigation

a. Initiation and Purpose of Investigation

Absent unusual circumstances, the investigation must begin within thirty (30) calendar days after the determination by the Deciding Officer that an investigation is warranted. The purpose of the investigation is to develop a factual record by exploring the allegations in detail and examining the evidence in depth, leading to recommended findings on whether research misconduct has been committed, by whom, and to what extent. The investigation will also determine whether there are additional instances of possible research misconduct that would justify broadening the scope beyond the initial allegations.

b. Notifying the Grantor and Respondent; Sequestration of Research Records

On or before the date on which the investigation begins, the Research Integrity Officer must: (1) notify the Grantor if required by law or contract of the decision to begin the investigation; and (2) notify the respondent in writing of the allegations to be investigated.

Prior to notifying respondent of the allegations, the Research Integrity Officer will take all reasonable and practical steps to obtain custody of and sequester in a secure manner all research records and evidence needed to conduct the research misconduct proceeding.

c. Appointment of the Investigation Committee

The Research Integrity Officer, in consultation with other institutional officials as appropriate will appoint an Investigation Committee and the committee chair within five (5) days of the beginning of the investigation or as soon thereafter as practical. The Investigation Committee must consist of individuals who do not have unresolved personal, professional, or financial conflicts of interest with those involved with the investigation. The Investigation Committee should include individuals with the appropriate scientific expertise to evaluate the evidence and issues related to the allegation, interview the respondent and complainant, and conduct the investigation. Generally the Investigation Committee will consist of three to five individuals; usually an appropriate dean is among the members. When necessary to secure the necessary expertise or to avoid conflicts of interest, the Research Integrity Officer may select committee members from outside the institution. All members of the Investigation Committee will be required to maintain the confidentiality of the investigation.

The Research Integrity Officer will define the subject matter of the investigation in a written charge to the Investigation Committee that informs the committee that, in order to determine that the respondent committed research misconduct, it must find that a preponderance of the evidence establishes that: (1) research misconduct, as defined in this policy, occurred; (2) the research misconduct is a significant departure from accepted practices of the relevant research community; and (3) the respondent committed the research misconduct intentionally, knowingly, or recklessly. The charge must inform the committee that it must prepare or direct the preparation of a written investigation report that meets the requirements of this policy.

d. Investigation Process

The Investigation Committee and the Research Integrity Officer must:

- 1) use diligent efforts to ensure that the investigation is thorough and sufficiently documented and includes examination of all research records and evidence relevant to reaching a recommendation on the merits of each allegation;

- 2) take reasonable steps to ensure an impartial and unbiased investigation to the maximum extent practical;
- 3) interview each respondent, complainant, and any other available person who has been identified as having information regarding relevant aspects of the investigation, including witnesses identified by the respondent;
- 4) record or transcribe each interview, provide a written summary to the interviewee for correction, and include the written summary in the record of the investigation; and
- 5) pursue diligently all significant issues and leads discovered that are determined relevant to the investigation, including any evidence of any additional instances of possible research misconduct, and continue the investigation to completion.

Respondents may consult with their Union Representative to seek advice and may bring their Union Representative to interviews or meetings pertaining to the investigation.

e. Elements of the Investigation Report

The Investigation Committee and the Research Integrity Officer are responsible for preparing a written draft report of the investigation that:

- 1) Describes the nature of the allegation of research misconduct, including identification of the respondent;
- 2) Describes the specific allegations of research misconduct considered in the investigation;
- 3) Includes the institutional policies and procedures under which the investigation was conducted;
- 4) Identifies and summarizes the research records and evidence reviewed and identifies any evidence taken into custody but not reviewed; and
- 5) Includes a statement of findings for each allegation of research misconduct identified during the investigation. Each statement of findings must: (1) identify whether the research misconduct was falsification, fabrication, or plagiarism, and whether it was committed intentionally, knowingly, or recklessly; (2) summarize the facts and the analysis that support the conclusion and consider the merits of any reasonable explanation by the respondent, including any effort by respondent to establish by a preponderance of the evidence that he or she did not engage in research misconduct because of honest error or a difference of opinion; (3) if misconduct is found, provide an assessment of the seriousness of the offense(s), including adverse effects resulting from the misconduct; (4) identify specific Grantor support; (5) identify whether any publications need correction or retraction; (6) identify the person(s) responsible for the misconduct; and (7) list any current support or known applications or proposals for support that the respondent has pending.

f. Comments on the Draft Report and Access to Evidence

The Research Integrity Officer must give the respondent a copy of the draft investigation report for comment and, concurrently, a copy of, or supervised access to, the evidence on which the report is based. The respondent will be allowed ten (10) days (which time shall be part of the total time for the Investigation) from the date he/she received the draft report to submit written comments to the Research Integrity Officer. The respondent's comments must be included and considered in the final report. In distributing the draft report, or portions thereof, to the respondent, the Research Integrity Officer will inform the recipient of the confidentiality under

which the draft report is made available and may establish reasonable conditions to ensure such confidentiality. For example, the Research Integrity Officer may require that the recipient sign a confidentiality agreement.

g. Decision by Deciding Official

The Research Integrity Officer will assist the Investigation Committee in finalizing the draft investigation report, and transmit the final investigation report to the Deciding Officer and the Respondent.

The Deciding Officer will, after consulting with the Research Integrity Officer and other appropriate officials, decide (1) whether the institution accepts the investigation report and its findings, and (2) the appropriate institutional actions in response to the accepted findings of research misconduct. The Deciding Officer will submit final determinations in writing. If this determination varies from the findings of the Investigation Committee, the Deciding Officer will, as part of his/her written determination, explain the basis for rendering a decision different from the findings of the Investigation Committee. Alternatively, the Deciding Officer may return the report to the Investigation Committee with a request for further fact-finding or analysis.

When a final decision on the case has been reached, the Research Integrity Officer will notify both the respondent and the complainant in writing. The complainant will only be entitled to know whether or not the allegation of misconduct was founded.

The Deciding Officer shall ensure that the final investigation report, the findings of the Deciding Officer and a description of any pending or completed administrative action are provided to the Grantor if required by law or contract. The Deciding Officer will then determine whether law enforcement agencies, professional societies, professional licensing boards, editors of journals in which falsified reports may have been published, collaborators of the respondent in the work, or other relevant parties should be notified of the outcome of the case. The Research Integrity Officer is responsible for ensuring compliance with all notification requirements of funding or sponsoring agencies.

h. Time for Completion of Investigation

The investigation is to be completed within sixty (60) days of its initiation. The institution will then take a maximum of thirty (30) days to collect comments on the draft report, finalize the report, make a decision on the disposition of the case, and send the final report to the Grantor if required by law or contract.

4. Completion of Cases

When a finding of research misconduct has been recommended by the Investigation Committee, potential disciplinary action may be taken in accordance with the applicable collective bargaining agreement for represented employees. Non represented employees follow normal disciplinary procedures.

The Research Integrity Officer is responsible for maintaining records of the research misconduct proceeding in a secure manner for seven (7) years after completion of the proceeding. The Research Integrity Officer will also ensure that administrative actions taken by the institution are

enforced and take appropriate action to notify other involved parties, such as sponsors, law enforcement agencies, professional societies, and licensing boards of those actions.

Generally, all inquiries and investigations will be carried through to completion and all significant issues will be pursued diligently. The Research Integrity Officer must notify any grantor, if required to by law or contract, in advance if there are plans to close a case at the inquiry, investigation, or appeal stage on the basis that respondent has admitted guilt, a settlement with the respondent has been reached, or for any other reason, except: (1) closing of a case at the inquiry stage on the basis that an investigation is not warranted; or (2) a finding of no misconduct at the investigation stage, which must be reported to any grantor if required to by law or contract, as prescribed in this policy.

5. Appeal

Within 14 days of receipt of the Investigation Committee report, the respondent may appeal in writing to the Deciding Officer solely on the following grounds:

- a. That there has been a material failure to follow the procedures prescribed in this policy and that the respondent called the error to the attention of the Investigation Committee or had reasonable grounds for not doing so. The appeal must specify the nature of the procedural error and why the Respondent believes it is likely to have affected the outcome of the investigation; or
- b. That the respondent has new and material evidence that was not reasonably available to the respondent during the Investigation. The appeal must specify the nature of the new evidence, why it was not reasonably available during the Investigation, and why the respondent believes it is likely to have affected the outcome of the investigation.

If the Deciding Officer, on his or her own motion or upon appeal by the respondent, finds that (a) there was procedural error or the respondent has new evidence that was not reasonably available during the investigation, and (b) there is a substantial possibility that the error or new evidence may have affected the outcome of the investigation, the Deciding Officer may refer the matter back to the Investigation Committee or to a new Investigation Committee appointed to reopen the case.

E. Effective Date: Approved 5-1-13

Updated Date:

Amended Date: