



**CODE OF BUSINESS
ETHICS AND CONDUCT**

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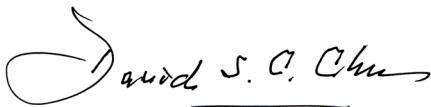
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At IDA we behave ethically, first and foremost because it is the right thing to do. In addition, because our value—indeed, our very existence—is dependent on the acceptance of IDA’s research findings by our sponsors and the research and academic community at large, it is vital that our work is not biased by even the smallest conflicting interest. Credibility is hard-earned and easily lost.

We created the IDA Code of Business Ethics and Conduct to help each of us reinforce IDA’s role as our sponsors’ trusted partner. It is important to note that while some of the instructions you will read here are imposed by law, most are guidelines we established ourselves. They reflect an internal ethos we take very seriously.

The purpose of these principles is not to find fault, but rather to protect both IDA and you when you find yourself in an ethically questionable situation. My general advice: become familiar with the principles outlined here, and if you are considering doing something, or being asked to do something, that does not “feel right,” you should refer to this guide or speak with your supervisor.

IDA has no more precious resource than its reputation, our stock in trade. Each of us—trustees, employees, consultants, and those detailed or assigned from the Government—has an obligation to avoid not just wrongdoing, but also the impression of impropriety. The information provided here will help you do the right thing.



President, IDA

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IDA CODE OF BUSINESS ETHICS AND CONDUCT

(IDA PRACTICE I-01)

PURPOSE

IDA's reputation for excellence as a research institution is based in large part on the high standards of conduct which you - IDA's employees and consultants - have maintained for more than 60 years.

This Code of Business Ethics and Conduct (the "Code") outlines the key principles of this ethical conduct. It should serve as an introduction to, and an overview of, IDA's expectations for how to behave and how to interact with our sponsors, business partners, fellow employees, consultants, and others. These principles are discussed in much greater detail in the several IDA Practices.

Although references to a number of relevant IDA Practices in this document are provided for your convenience, you are required to comply with all IDA Practices. For this reason, we encourage you to review all of the IDA Practices on a regular basis, including those not referenced in this document.

RESPONSIBILITIES OF MEMBERS OF THE IDA COMMUNITY

We take our ethical responsibilities seriously. Failure to comply with any provision of this Code or any IDA Practice may result in disciplinary action, up to and including termination of your relationship with IDA. IDA may also refer certain violations to regulatory or law enforcement authorities. These consequences may apply not only to employees and consultants who commit misconduct, but also to those who encourage misconduct, to those who fail to report or take reasonable measures to prevent, detect, and address misconduct, and to those who seek to retaliate against persons who report potential misconduct.

When confronted with an ethical dilemma, you should ask yourself the following four questions about the action you are considering:

- Will my actions violate any laws or IDA Practices?
- Could my actions appear improper? (Would you be willing to see your actions detailed in the Washington Post?)
- Will my actions negatively affect others?
- Will others feel I owe them something in return—or that they owe me something—if I take this action?



If the answer to any of these questions is “Yes” or “I don’t know,” you should reconsider your options, and, if need be, obtain guidance from IDA Management.

You may never violate this Code or any IDA Practice, even if a supervisor directs you to do so. If you receive such a request, you should advise your supervisor that the request violates the Code. If your supervisor refuses to modify his or her request, you should contact Human Resources or the Office of General Counsel immediately.

REPORTING CONCERNS UNDER THE CODE TO IDA MANAGEMENT

As a Federal Government contractor, IDA is legally required to timely disclose any credible evidence that someone at IDA—whether a Trustee, officer, employee, agent, consultant, or subcontractor – has committed a violation of Federal criminal laws involving fraud, conflicts of interest, bribery, or has significantly overcharged or mischarged the Government. As a result, you are expected to promptly notify IDA Management if you become aware of any such conduct—even if you think the conduct appears minor or unintentional.

Some of the issues that must be reported are:

- Task overcharges, mischarges, or significant mismanagement of task resources;
- Conflicts of interest that have not been reviewed via the appropriate IDA channels;
- Payments, gifts, gratuities, benefits, or other activities that could be construed as bribery;
- Abuse, alteration, tampering, or other improper use of badges, passes, approvals, or any other official U.S. Government documents;
- Unauthorized use of U.S. Government computer systems or networks; or
- Theft of trade secrets or other improper use of proprietary information.

In addition, IDA Management needs to learn of—and then deal with—any situations that could result in legal liability to the Institute. For that reason, you need to promptly notify IDA Management of these types of situations. While not an exhaustive list, these situations could include:

- Workplace injuries;
- Workplace discrimination or harassment of any kind;
- Threats or indications of potential litigation involving IDA;

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- Former Government personnel working on tasks or assignments in violation of an ethics letter;
 - Transfers of controlled information to foreign persons without approval by the IDA Export Control Office;
 - Scientific misconduct, including plagiarism, copyright violation, falsification of research, or unapproved human subjects research;
 - Violent behavior or threats of violence involving IDA personnel or facilities;
 - Any other conduct or behavior that violates or threatens to violate either the spirit or the substance of this Code; and
 - Any other conduct or behavior that you believe exposes IDA to potential liability.

You may report any of the above concerns to the management of your respective division or directorate, or to any of the following headquarters personnel:

- IDA Vice President, Finance and Administration (703.845.2500)
- IDA Vice President, Programs (703.845.2201)
- IDA Office of General Counsel (703.845.2500 or 703.578.2853)
- IDA Human Resources Directorate (703.845.2061 or 703.578.2896)
- IDA Finance Director (703.845.2079)

Although your division or directorate management may request that issues involving day-to-day operations be reported through your normal supervisory chain, they may not prohibit or in any way discourage you from raising any concern to the IDA Headquarters personnel identified above.

You may also report issues of concern under this Code using the Code Reporting Form (CRF) available to all employees, consultants, sponsors and the general public on the following external site: <https://app.ida.org/corporatecompliance>. Although it is generally helpful to know the identity of the person reporting a concern under this Code, the CRF permits you to submit a concern anonymously, if you so desire.

IDA Management will not disclose the identity of any person reporting a concern under this Code, unless limited disclosure is necessary for an internal investigation or is required by law. You will not be penalized for reporting suspected offenses in good faith, even if your suspicions are ultimately proven to have been unfounded. You are strongly encouraged to report suspected violations, even if you are not directly involved.

IDA will independently and thoroughly investigate all reported concerns, and will implement any appropriate corrective and disciplinary actions. In addition, IDA will cooperate with any Government agencies responsible for audits, investigations, or any other actions associated with the disclosure of these matters.

In addition to reporting to IDA Management, if you witness fraud, waste, or abuse of authority, a violation of the law, potential leaks of classified information, or potential acts of terrorism, you may also report the conduct directly to the Government. If you are working on IDA Systems and Analyses Center tasks, you may call the Department of Defense Hotline (800-424-9098). If you are working on Science and Technology Policy Institute tasks, you may contact the National Science Foundation Hotline (703-292-7100 or 800-428-2189). Finally, if you are working at the IDA Center for Communications and Computing, you may file an online complaint (no telephone line is available) at the following address: https://www.nsa.gov/about/oig/oig_hotline.shtml.

EMPLOYEE RELATIONS

Diversity and Discrimination

At IDA, diversity means embracing differences and promoting an inclusive organization that values the diversity of employees as a means of driving business success. IDA is committed to providing a diverse, productive work environment that is free from unlawful discrimination or harassment. We conduct all employment activities (including those relating to hiring, promotion, compensation, benefits, training, and termination) in a nondiscriminatory manner, and in accordance with Federal, state, and local laws prohibiting discrimination.

To foster a productive workplace, IDA will attempt to accommodate the needs of those with physical or other disabilities. If you believe you need such an accommodation, you should talk either with your supervisor or with Human Resources. You may also use IDA's online system.

IDA's objective is to use valid, job-related criteria as the basis for all employment-related decisions. Any bias, discrimination, or harassment prevents us from achieving this objective.

For more information, see [IDA Practice 2-04, Equal Employment Opportunity](#).

Harassment

IDA is committed to a work environment that is free from harassment or other personal behaviors that detract from a healthy work environment.

Harassment may include any behavior (verbal, visual, or physical) that creates an intimidating, offensive, or hostile work environment. Employees and consultants are responsible for their actions while conducting company business, and are expected to treat other employees, consultants, vendors, sponsors, and contractors with respect.

IDA's prohibition on harassment includes sexual harassment. Sexual harassment includes, but is not limited to, unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions. Degrading or humiliating jokes, photographs, slurs, intimidation, or other harassing conduct is also not acceptable in the workplace.

For more information, see [IDA Practice 2-72, Harassment, Including Sexual Harassment](#).

Inappropriate Relationships in the Workplace

It is not uncommon for work relationships to develop into social relationships. Casual platonic friendships or social interactions are not normally problematic. However, there is a danger that the suggestion of a romantic relationship may be perceived as harassment and that such a relationship (or its termination) may prove disruptive within the workplace. These dangers increase significantly when one employee is in a supervisory role. Therefore, it is particularly important that supervisors, including task leaders, avoid the establishment or appearance of a dating, romantic, sexual, or other very close personal relationship with any subordinate employee or consultant.

For more information, see [IDA Practice 2-72, Harassment, Including Sexual Harassment](#).

Employee Privacy

IDA acquires and retains personal information about you in the normal course of operations, including for the maintenance of employee security clearances and the provision of employee benefits. If you are given access to any of this personal information within the scope of your professional responsibilities, you must take appropriate steps to protect all such employee information, including social security numbers, identification numbers, passwords, financial information, and residential telephone numbers and addresses.

You should never access, obtain, or disclose another employee's personal information to persons inside or outside of IDA unless you are acting for legitimate business purposes and in accordance with applicable laws, legal processes, and IDA Practices (including obtaining any approvals necessary under these policies).

ENVIRONMENT, SAFETY, AND HEALTH

IDA is committed to protecting its staff and visitors from potential workplace hazards, and to complying with applicable laws, regulations, policies and procedures that govern workplace health and safety. It is our policy to comply with all applicable environmental, safety, and health laws and regulations, to apply responsible standards where such laws or regulations do not exist, and to seek ways to achieve excellence in these critically important areas.

Substance Abuse

IDA maintains a safe and drug-free environment. The illegal or unauthorized use of drugs and the consumption of alcohol creates safety hazards and hinders our ability to work effectively. For these reasons, you may not use, transfer, sell, manufacture, or possess illegal drugs, or consume unauthorized alcoholic beverages, while on IDA premises or in IDA vehicles. If you have a problem related to alcohol or drugs, you are encouraged to seek assistance from the Employee Assistance Program or other qualified professionals.

For more information, see [IDA Practice 2-71, Drug-Free Workplace and Workforce](#).

Workplace Violence

IDA will not tolerate any threatening, hostile, or abusive behavior in the workplace, while in company vehicles or on company business, or by any persons on company property. IDA will also not tolerate threatening, hostile, or abusive conduct directed at employees, consultants, or sponsors by IDA personnel at any time or place. Damage to property is also prohibited. In addition, IDA employees and consultants may not possess or use any weapon or any component of a weapon (e.g., ammunition) on company property.

You must report any instance of violence, hostile behavior, or possession of weapons on company property to IDA Security immediately. In cases of imminent danger, you should contact local law enforcement first (by dialing “911”), and then contact IDA Security at 703.845.2188.

CONFLICTS OF INTEREST

For IDA to maintain its position of trust and confidence with the Government, its work must be characterized by unquestioned integrity and objectivity. This level of independence requires that IDA remain free from organizational conflicts of interest, and that its staff be free of personal conflicts of interest.

An organizational conflict of interest occurs when IDA engages in business activities that diminish its capacity to give impartial, technically sound,

objective assistance or advice. In order to avoid these types of relationships (and to comply with sponsor and regulatory requirements), IDA obtains sponsor approval for all non-sponsor task work, does not accept work from commercial entities, and does not compete with non-FFRDC entities for Government contracts. By taking these steps, IDA is able to maintain its independence as an organization. However, these steps alone will not be sufficient to ensure IDA's independence unless you, as an employee or consultant, also take similar steps to keep yourself free from business, financial, and personal relationships that could potentially compromise your own independence and objectivity. These relationships are referred to as personal conflicts of interest, and are explained in further detail below and in [IDA Practice 9-02, Conflicts of Interest and Permitted Outside Activities](#).

Personal Conflicts of Interest

A personal conflict of interest may occur when your personal activities and relationships, financial interests, or other associations might compromise or appear to compromise your responsibilities to IDA. [IDA Practice 9-02, Conflicts of Interest and Permitted Outside Activities](#), provides guidance for avoiding personal conflicts of interest, as well as the appearance of such conflicts, that may arise from:

- The solicitation or acceptance of compensation, gratuities, or any other item of more than *de minimus* monetary value, from any non-Governmental source that may be affected by IDA work;
- The use of non-public information for private gain;
- Personal financial interests in and personal relationships (including family and household relationships) with individuals or entities that may be affected by IDA work; and
- Affiliations with other organizations and other professional activities.

In addition, you should note that certain obligations regarding outside activities continue to apply even after you are no longer employed by IDA. For example, once you are no longer employed by IDA, you may not:

- Use or disclose non-public information obtained during your employment with IDA;
- Solicit any IDA employees to leave IDA within one year of separation from IDA employment; and
- Use research or other information belonging to IDA without appropriate permission, even if you were the one who conducted the research during your employment.

To avoid a potential conflict of interest, you should disclose any affiliation

or relationship that might be misinterpreted by others. IDA has established guidelines and procedures for each of its FFRDCs to help you identify potential conflicts of interest. For those working in IDA's Systems and Analyses Center or the Science and Technology Policy Institute, you must complete the Conflicts of Interest Screening questionnaire prior to beginning work on any IDA task, and you have an obligation to update the questionnaire any time your circumstances change. The addendum to [IDA Practice 9-02](#) provides additional guidance for those working at the IDA Center for Communications and Computing.

Insider Trading

Illegal insider trading occurs when a person trades in a company's securities using information that is not publicly available (generally referred to as "inside" information) that could reasonably affect a person's decision whether to buy or sell the securities (generally referred to as being "material"). It also occurs when a person gives material inside information to someone else who trades on that information. Illegal insider trading is a felony and can result in civil or criminal penalties, including imprisonment.

As an IDA employee or consultant, you may become aware of material inside information about companies with which IDA or its sponsors do business. You must never use material inside information (even if you also acquired it independently as a "tip" from others) to trade in any company's securities. This prohibition also includes trading in derivative securities, such as calls and puts, and engaging in short selling or other hedging transactions. In addition, you may not provide material inside information to any other person, including members of your family or your friends, or assist any other person in buying, selling, or entering into any other transaction using material inside information.

Meals, Gifts, and Gratuities

A Government employee is generally prohibited from soliciting or accepting gifts from prohibited sources (which usually includes contractors), or gifts given because of his or her official position (5CFR 2635 Subpart B). To avoid creating problems for our Government sponsors and colleagues, you may not offer, promise, or give any money, gratuity, or other thing of monetary value (which excludes presentation items of little intrinsic value) to Government personnel with whom IDA may have business or official dealings.

Fortunately, the rules expressly permit you to provide modest items of food and refreshments (e.g., soft drinks, coffee, donuts) offered other than as part of a meal. Depending on the circumstances, you may also be able to provide Government personnel with modest "working lunches" at meetings occurring on IDA premises. However, you should make it easy for any Government attendee who wishes to pay for the "working lunch" to do so.

In addition, the rules permit Government employees to accept modest benefits in situations where it is apparent that the Government employee has no official responsibility or role with regard to IDA work, or where the hospitality or gratuity is primarily motivated by an established personal relationship. If you are not certain whether this exception will cover a benefit you plan to provide, you should consult with the Office of General Counsel.

While acting in their professional capacity, IDA employees and consultants may accept modest meals and refreshments from non-Governmental personnel, provided that the acceptance of such meals or refreshments could not reasonably be construed as an attempt to secure favorable treatment. Such meals and refreshments should not be lavish, extravagant, or frequent.

Relationships with Vendors and Suppliers

IDA buys certain goods and services from third parties. Although IDA may give small and/or disadvantaged business preference in procurement, the selection of services or goods should generally be based solely upon price, quality, service, and need. Employees involved in the selection and/or purchase of goods and services from vendors and suppliers should avoid situations that could interfere, or appear to interfere, with their ability to make free and independent decisions regarding purchases on behalf of IDA.

Purchases from suppliers must be free from any indication that the supplier sought or received favorable treatment through gifts, favors, entertainment, services, discounts, or other gratuities or benefits. If you are offered or receive any gift or favor of more than nominal value, you should not accept it and notify your supervisor. Employees are not prohibited from giving or receiving items of small value commonly exchanged in business relationships. However, even in these cases, discretion and common sense should be your guide.

More information regarding IDA's procurement policies can be found in [IDA Practice 7-01, Procurement Policies and Procedures](#).

Post-Employment Restrictions for Former Government Personnel or Prior Employment

Various provisions of Federal law are designed to limit the ability of former Federal employees to "switch sides" after leaving Government service. For example, former Senior Government Employees may be subject to a one-year ban on representing IDA before their former Government agency. Other former employees may be subject to a two-year or "lifetime" ban on representing IDA on a particular matter for the "lifetime" of that matter. Because of the complexity of determining how and to whom these restrictions apply, IDA requires that most employees or consultants departing Government service obtain an ethics opinion from the relevant Government ethics office before they can begin employment with IDA.

In other cases, IDA employees or consultants may be subject to restrictions from former private sector employers (usually contained in a “non-compete agreement” or other similar arrangement) that will effectively limit their ability to be assigned to certain IDA projects. In the event you are subject to any such restrictions, you must make them known to IDA Human Resources as early as possible so that IDA can avoid assigning you to projects that may result in legal challenges down the road.

Although IDA maintains a copy of these opinions and restrictions in its internal records, it is your responsibility to ensure that you comply with any applicable post-employment restrictions.

Communications with Congress, the Press, and the Public

It is IDA policy that we do not make the results of our work public without specific sponsor permission. In light of this policy, and because of the possibility of putting IDA into conflict with its sponsors, requests from Congressional committees or other Governmental entities should be handled with particular care. Before responding to such a request, you must obtain specific approval from your Director and the Vice President, Programs. You will usually be advised to check with your sponsor and the Corporate Communications Group as well.

Similarly, you must be vigilant when talking to the news media. Interviews on current issues have the potential of appearing to our sponsors as a breach of the special relationship of trust that is so important to IDA. Therefore, you should not give information to a reporter without first receiving approval or guidance from your sponsor, your Director, and the Vice President - Programs. You are also strongly encouraged to consult with the Corporate Communications Group. Even then, you must be very careful to protect classified, proprietary, or sensitive information.

For more information, read [IDA Practice 9-02, Conflicts of Interest and Permitted Outside Activities](#) and [Addendum 1 to Practice 6-01](#).

ACCOUNTING AND FINANCIAL RECORDS AND CONTROLS

IDA is committed to managing its resources wisely and executing its financial responsibilities with accuracy and integrity. All IDA employees and consultants are expected to conduct financial operations in compliance with applicable laws, regulations, and in accordance with IDA Practices and procedures. If you become aware of any potentially fraudulent or illegal business transactions being conducted in the name of IDA, you should immediately notify your supervisor or a member of IDA Management, as discussed above.

Business Records and Communications

Each of us is responsible for the integrity of the business records and communications that we create, and making false or misleading entries in IDA's books and records is prohibited. All records—including those related to timesheets, travel and entertainment expenses, purchasing, and finances—must be accurate and complete.

IDA's business records need to be maintained, stored, and disposed of according to established IDA procedures. IDA is required to maintain some documents for legal reasons, and other documents are maintained in order to help IDA operate more efficiently. While there are very strict rules, for example, concerning records retention for IDA's Human Resources and Finance documentation, the general rule for most IDA documents is that you should keep sufficient data and records so that someone else could replicate your results for a reasonable period of time after your work was conducted.

For additional guidance, see IDA Practices 8-05, Distribution of Professional Staff Effort IDA - VA; 8-06, Distribution of Professional Staff Effort-IDA California, Maryland, New Jersey; and [8-10, Travel Policies and Procedures](#).

Respecting Company Resources

All IDA employees and consultants are responsible for the proper and efficient use of IDA facilities, furniture, equipment, and supplies. IDA provides information and communications systems to allow you to conduct IDA business. You must protect IDA information and data from accidental or unauthorized disclosure, misuse, improper alteration or destruction. You must also protect IDA's information and communications systems, including maintaining the confidentiality and integrity of information, and complying with security controls and procedures established by IDA.

While IDA permits you to engage in modest personal use of company computing and communications resources, you must ensure that this personal use does not interfere with your job performance or impose an undue burden on IDA resources. In addition, you may never use IDA's systems to engage in activities that are unlawful, violate IDA Practices, or could result in liability or embarrassment to IDA. Inappropriate and prohibited uses include:

- Commercial, political, or illegal activities;
- Intentional and unauthorized viewing or creation of pornographic material or material that could be viewed as harassing or offensive;
- Participation in online gambling;
- Any activity that would bring discredit upon IDA or our sponsors; and
- Using IDA systems to gain unauthorized access to non-IDA information systems, whether within, or outside, IDA.

IDA employees and consultants are required to take basic precautions to ensure the security and the availability of IDA's computer network. As part of this requirement, IDA employees and consultants must use an IDA-managed email account for task-related communications, unless specifically required to use a separate address issued by the sponsor for that sponsor's task work. IDA employees and consultants are also required to use only IDA-approved data storage services, collaboration utilities, and other data exchange services for task activities, unless an exemption has been granted.

For more information, see [IDA Practice 6-01, Information and Information Technology](#), [IDA Practice 6-03, Wireless Security Policy](#), [IDA Practice 6-06, Remote Access Policy](#), [IDA Practice 6-05, Email Acceptable Use Policy](#), and [IDA Practice 2-72, Harassment, Including Sexual Harassment](#).

REGULATORY COMPLIANCE

IDA is committed to maintaining a culture of compliance throughout its organization. Because of the inherent complexity of these regulatory regimes, and the need for consistency across all of IDA's operations, IDA employees and consultants must actively cooperate with IDA's internal experts on all issues related to regulatory compliance.

Classified, Proprietary, or Sensitive Information

IDA is committed to safeguarding all IDA, sponsor, and third-party information that is classified, proprietary, or sensitive (see [IDA Practice 3-03, Marking and Control of Information](#) and [8-12, Procedures for the Negotiation of Proprietary Information Agreements and the Handling of Proprietary Information](#)), regardless of the form in which that information is found. In addition to information marked as classified for national security purposes, information requiring protection includes information regarding IDA's business activities and financial performance, personal information about IDA employees or consultants, proprietary technical and financial data received from other companies, and non-public planning and budgeting information provided by our sponsors.

Such information should only be used for legitimate business purposes by employees and consultants with a business "need to know." You have an obligation to safeguard this information both during your employment with IDA and after your employment with IDA has concluded.

Additional information can be found in [IDA Practice 6-01, Information and Information Technology](#), as well as the forms and agreements you signed when you joined IDA.

Export Controls

The U.S. Government regulates exports to protect national security and promote foreign policy interests. These regulations, commonly called export controls, apply not only to the export of goods, but also to the furnishing of technical assistance and the disclosure of technical data, both classified and unclassified, to foreign nationals located in the U.S. and abroad.

As certain IDA's activities fall within the scope of these rules and regulations, IDA has implemented an export compliance program, both in order to protect U.S. national security interests and to protect IDA and its individual employees from civil and criminal penalties. It is your responsibility to be mindful of U.S. export controls and to observe all applicable IDA procedures in their IDA work.

For a full explanation of IDA's Export Compliance Policy, employees at IDA/SAC and IDA/STPI should see [IDA Practice 3-01](#); employees at the IDA Communications and Computing FFRDC should consult their Division Director.

Human Subjects Research

Because IDA's research is funded by the U.S. Government, IDA is subject to various regulatory requirements on the protection of human subjects in research. Here at IDA, these regulatory requirements generally triggered by research that involves gathering data from individuals or working with data that contain elements identifying specific individuals. In some cases, these regulations may require that IDA have the research protocols reviewed in advance by an outside Institutional Review Board (IRB); obtain the informed consent of individual participants in the research; and/or modify the scope of a research project to meet regulatory requirements.

INTELLECTUAL PROPERTY

IDA's contracts require that the Government receive a license to all intellectual property generated under these contracts. To comply with this requirement, IDA considers all works produced by employees and related to IDA's business to be owned by IDA, even if you produced the work outside of your day-to-day IDA responsibilities. For consultants, the Consulting Agreement grants the needed licenses.

In addition, IDA is required to report all patentable inventions to its Government sponsors. To enable IDA to satisfy this reporting requirement, you must promptly report any invention to the IDA Vice President, Finance and Administration.

See [IDA Practice 2-15, IDA Patent and Copyright Policy](#), and [IDA Practice 9-02, Conflicts of Interest and Permitted Outside Activities](#). The Invention Disclosure Form is available on the IIS at <https://idacms.ida.org/upload/pdf%20files/inventiondisclosure.doc>.

Publishing Books and Articles

IDA encourages the publication of papers in professional journals as well as writing, collaborating on, reviewing, or editing books for publication by academic or commercial presses. However, IDA requires that you get approval from your Division Director, the Vice President, Programs, and your sponsor (where applicable) as appropriate, for all material relating to IDA's business.

Because any work prepared by an IDA employee within the scope of his or her employment constitutes a "work made for hire," IDA is generally considered to be the copyright owner for any written work product falling within one of the subject matter areas in which IDA operates professionally (referred to as IDA's "lane of business"). For that reason, IDA requires that any publication arrangements related to employee works be reviewed by the Vice President, Finance and Administration. Copyright transfer agreements must be approved and signed by the Vice President, Finance and Administration. Where applicable, a written agreement between you and IDA concerning any royalty payments should also be executed in advance of publication.

You may not submit for publication any work that is derived from a task or is IDA-funded until it has been approved by the Government for public release. This includes article abstracts, testimony, presentations, blog entries, and other informal publications that overlap with IDA's lane of business. Because the Government's clearance process can be slow, you must plan accordingly.

More information regarding intellectual property, patents, and publishing books or articles can be found in [IDA Practice 2-15, IDA Patent and Copyright Policy](#), [IDA Practice 9-02, Conflicts of Interest and Permitted Outside Activities](#), and [Practice 5-10, IDA Publications](#), and [Addendum 1 to Practice 5-10, Non-Standard IDA Publications](#).

Copyrights and Licenses

IDA must respect copyright laws and observe the terms and conditions of any software license agreements to which IDA is a party.

Copyright laws prohibit the unauthorized reproduction or public distribution of an "original work," or the creation of a derivative work, without the permission of the copyright holder. This means that you should not engage in activities like photocopying a journal article or scanning an engineering standard without first verifying that the activity does not violate copyright law.

The use of software by IDA employees and consultants is also subject to the terms software license agreements that may restrict the number of software copies that may be used by IDA and how those copies may be distributed. It is important that you determine what license restrictions apply to a particular piece of software before copying or distributing that software, including distributions to other members of the IDA community.

Scientific Misconduct in Research

Unethical behavior in research strikes at the heart of the scholarly and research enterprise. It is therefore critical that all members of the IDA community develop a clear understanding of the expectations and responsibilities with regard to scientific misconduct in research. Misconduct can take many forms, including fabrication or falsification of data, theft of ideas or direct plagiarism, and deliberate interference with the integrity of the work of others.

Because scientific misconduct occurs most frequently in cases where supervision at each relevant level is not being duly exercised, you must exercise any supervisory responsibilities you have been given with the utmost care and concern. In the event you suspect scientific misconduct of any type, you must promptly report your suspicions to the Vice President, Programs.

Additional information on IDA's treatment of Scientific Misconduct in Research is available at [IDA Practice 9-03](#).

CONCLUSION

Underlying each of the above statements is IDA's overall commitment to act with integrity and honesty in all activities. IDA expects you to recognize ethical issues and address them appropriately, even if they are not explicitly covered in this Code.

IDA recognizes that a number of the issues covered by this Code are complex and may have no clear-cut "right" answer. If you are in any doubt about the propriety of a particular course of action, ask for a second opinion.



IDA

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