



# Research Integrity in Peril: Plagiarism by the Food and Drug Administration

John H. Hnatio

Chief Scientist, FoodQuestTQ LLC

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# Research Integrity in Peril: Plagiarism by the Food and Drug Administration



The Food and Drug Administration (FDA) is the world's largest agency for overseeing the quality of research when it comes to the safety of food and medicines.

When the FDA plagiarizes the work of others it places the integrity of the research programs they oversee at risk.

If the FDA itself plagiarizes the work of others, then what credibility do they have in preventing the researchers they oversee from doing the same thing.

The integrity of the research programs conducted to assure the safety of the foods and medicines we take can literally make the difference between life and death.

# Accidental or Deliberate

## WHAT IS PLAGIARISM?

### Deliberate Plagiarism

- Intentionally rewriting the content of books and articles without citing the sources
- Intentionally buying, downloading or borrowing someone else's work
- Intentionally taking the concepts or ideas originated by someone else
- Re-phrasing, reordering or representing someone else's ideas to intentionally disguise their true source

### Accidental Plagiarism

- Failing to understand the rules and importance of research integrity
- Failing to understand when and how to use citations
- Poor selection of secondary sources that fail to properly cite original sources
- Assuming that ideas are common knowledge by failing to conduct due diligence

The story we are sharing with you today is about how the FDA is violating research integrity by plagiarizing the work of others.

The situation is really no different than catching a high school or college student stealing the work of others in order to write a term paper.

The most common reason for plagiarism is simple laziness- the failure to adequately research the ideas you are writing about and then claiming them as your own original work.

Another frequent cause of plagiarism is assuming that ideas are "common knowledge." But research integrity tells us that all ideas originate somewhere and it is the researcher's obligation to find and cite the work of others.

But by far, the most egregious form of plagiarism is re-phrasing , reordering or representing in some other form the ideas of someone else in order to purposely disguise them as your own original ideas.

As adapted from the University of Connecticut student guidance on the meaning of plagiarism. See: <http://classguides.lib.uconn.edu/content.php?pid=50827&sid=386249>



# Examples of FDA Plagiarism of FoodQuestTQ Products

## 2000-2006 FQTQ Research and the 2007 FDA Food Protection Plan

Representative Quotation from 2000-2006 Doctoral Research Dissertation	Page
"So, what we may really need is a new cultural perspective — one that encourages us to think on an <i>a priori</i> basis about complex events and situations and to take appropriate actions to prevent serious problems before they happen and, if they occur, to have taken a close look at how to mitigate their adverse consequences ."	113

I began my doctoral research in 2002 at the George Washington University.

The central idea portrayed throughout my research was simple-if you can prevent something bad from happening in the first place it's better than just waiting around to pick up the pieces afterwards.

This was long before there was any wide recognition that the culture of food safety had to shift from reaction after the fact to preventing food illnesses before they can do harm.

In 2002, what is now common knowledge about the need to place new emphasis on prevention was a new, and to some people, a radical way of thinking about things.

The idea of preventing bad things before they happen as presented in my research dissertation is now the cornerstone of the 2007 FDA Food Protection Plan.



### A Message from the Commissioner

With this FDA Food Protection Plan we are going even further. It is a forward-oriented concept that uses science and modern information technology to identify potential hazards ahead of time. By preventing most harm before it can occur, enhancing our intervention methods at key points in the food production system, and strengthening our ability to respond immediately when problems are identified, FDA can provide a food protection framework that keeps the American food supply safe.

Andrew C. von Eschenbach, M.D.  
Commissioner of Food and Drugs

# Examples of FDA Plagiarism of FoodQuestTQ Products

## FoodQuestTQ's Food DefenseTQ and FDA's Mitigation Strategies Database

It was way back in 2002, when we envisioned building the world's most advanced computer software for risk management.

The new ideas conceived way back then are now the basis for many of the buzz words you now hear in today's food industry- ideas like science and risk driven, quantitative versus qualitative analysis, event paths, critical nodes, prevention versus reaction, indicators and warnings and so on and so on.

In our first computerized tool, FoodDefenseTQ (with TQ standing for threat quotient), we developed a set of criteria to mitigate against both the occurrence of and responses to food related events. In the FDA's Food Defense Mitigation Strategies Database they stole our ideas to do the same thing.

Food DefenseTQ was developed two years before the FDA plagiarized and duplicated it with the release of their Food Defense Mitigation Strategies Database in 2011.

The image is a composite screenshot showing two web pages side-by-side to illustrate plagiarism. On the left is the FoodQuest TQ interface, featuring a 'Minimum Standard' section with two radio button options: 'Yes, all of the below min' and 'No, all of the below mini'. Below these are four numbered criteria for facility screening. On the right is the FDA's 'U.S. Food and Drug Administration - CFSAN - Food Defense Mitigation Strategies Database' page. A red circle highlights a section titled 'Applicant Screening Procedures' with the objective 'Confirm the identity of applicants and ensure applicant in'. Below this objective is a bulleted list of four items: 'Verify all information provided on the employment applica', 'Confirm the identity and credentials for all job applicants', 'Conduct in-person interviews with potential candidates a background chec', and 'Check all names used by the applicant.' A red arrow points from the FDA's list back to the FoodQuest TQ criteria, indicating that the FDA's content is a copy of FoodQuest TQ's.

FoodQuest TQ™

Minimum Standard

☐ Yes, all of the below min

☐ No, all of the below mini

1. The facility screens pote

2. The facility conducts pre

vendors.

3. The facility has an approved written policy for conducting background checks and employee drug scre

4. The facility examines the background of all staff as appropriate to their position, considering candidate

facility and the degree to which they will be supervised

U.S. Food and Drug Administration

Protecting and Promoting Your Health

U.S. Food and Drug Administration - CFSAN - Food Defense Mitigation Strategies Database

Applicant Screening Procedures

Objective: Confirm the identity of applicants and ensure applicant in

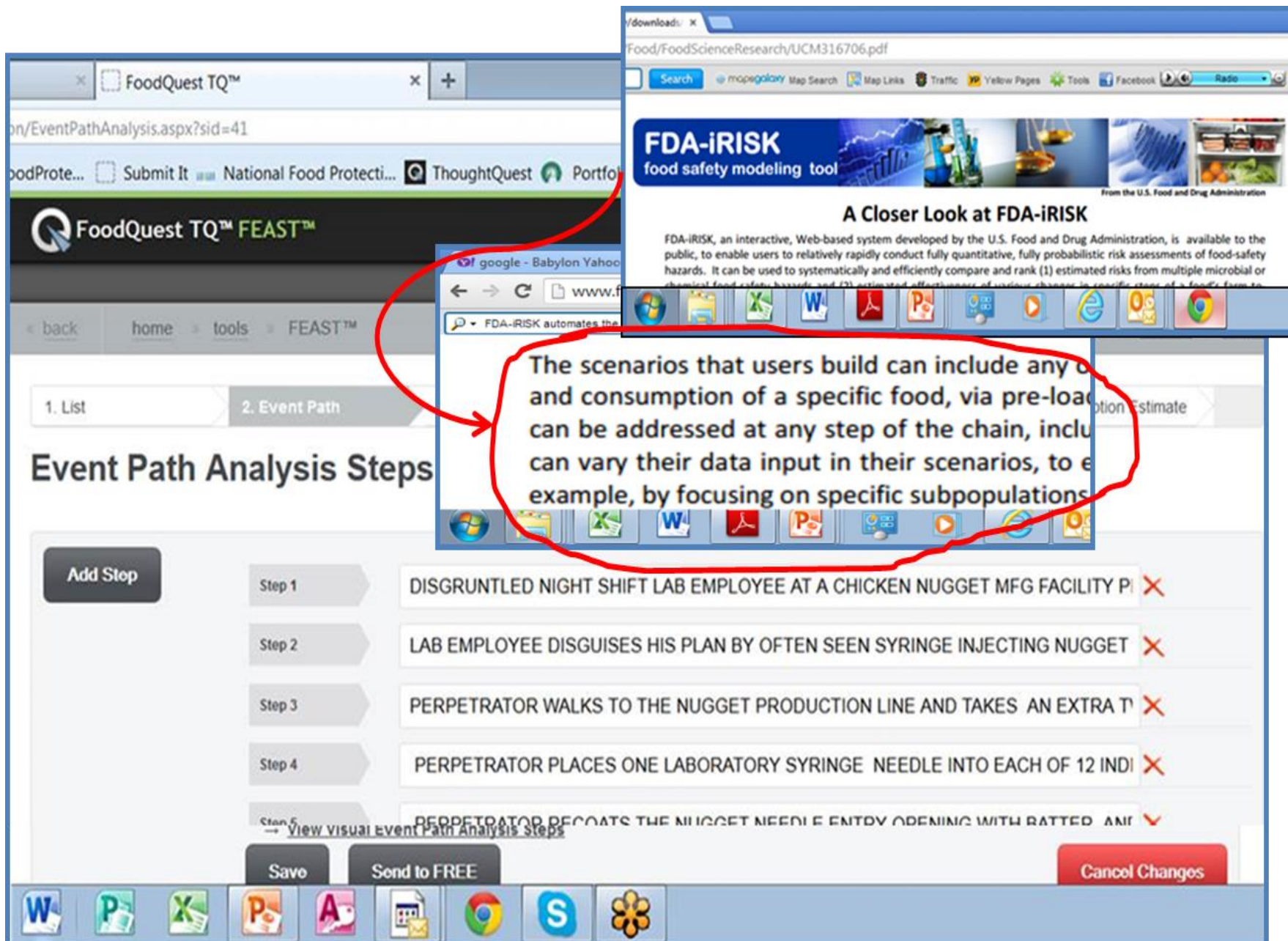
- Verify all information provided on the employment applica
- Confirm the identity and credentials for all job applicants
- Conduct in-person interviews with potential candidates a background chec
- Check all names used by the applicant.





# Examples of FDA Plagiarism of FoodQuestTQ Products

## FoodQuestTQ's Food Event Analysis and Simulation Tool (FEAST) and FDA's iRisk Tool



The FDA iRisk tool is another example.

In this case, the FDA duplicated the idea of using computational risk analysis to support food event scenarios.

Just like our Food Event Analysis and Simulation Tool or FEAST, the FDA iRisk tool allows you to structure and apply risk values along food safety and food defense event paths.

The development and release of FEAST by FoodQuestTQ pre-dated the release of the FDA iRisk tool in 2010 by over a year.



# Examples of FDA Plagiarism of FoodQuestTQ Products

## FoodQuestTQ's Food Event Analysis and Simulation Tool (FEAST) and the FDA's Food Defense Mitigation Strategies Database

The screenshot shows the FoodQuest TQ FEAST interface. A table titled 'Critical Nodes Analysis - Deter' lists various nodes with their actual and expected performance. A red circle highlights a specific node, 'Employee Background Checks', which has an actual performance of 1 and an expected performance of 1. A red arrow points from this node to a pop-up window that displays text from the FDA's Food Defense Mitigation Strategies Database. The text in the pop-up window is as follows:

Each Node Security Data Sheet (NSDS) in the Food Defense Mitigation Strategies Database (FDMSD) provides a bulleted list of preventive measures for several different food industry categories that may help reduce the likelihood of an attack. Some of the proposed strategies address a very basic level of security while some address a much more involved level. Not all of the measures suggested are applicable or practical for all sizes and types of food production facilities. It is the responsibility of the owner/operator/supervisor to choose those measures that are appropriate for their facility.

Below the text, there is a 'Category' dropdown menu set to 'General Information' and a 'Node' dropdown menu set to 'Facility'. An 'Add' button is also visible.

Critical Node	Actual Performance	Expected Performance
Employee Background Checks	1	1
Surveillance	2	2
Copycat Monitoring	2	2
Hazardous Material	3	7

In this example, the FDA plagiarized our idea of identifying and using the nodes of the food supply system to identify and categorize preventive measures to stop food defense events.

As you can see here, a full two years before the FDA released their Food Defense Mitigation Strategies Database in 2011, we had already developed and were applying the idea of using the nodes of the food supply system as part of our Food Event Analysis and Simulation Tool or FEAST.





# Examples of FDA Plagiarism of FoodQuestTQ Products

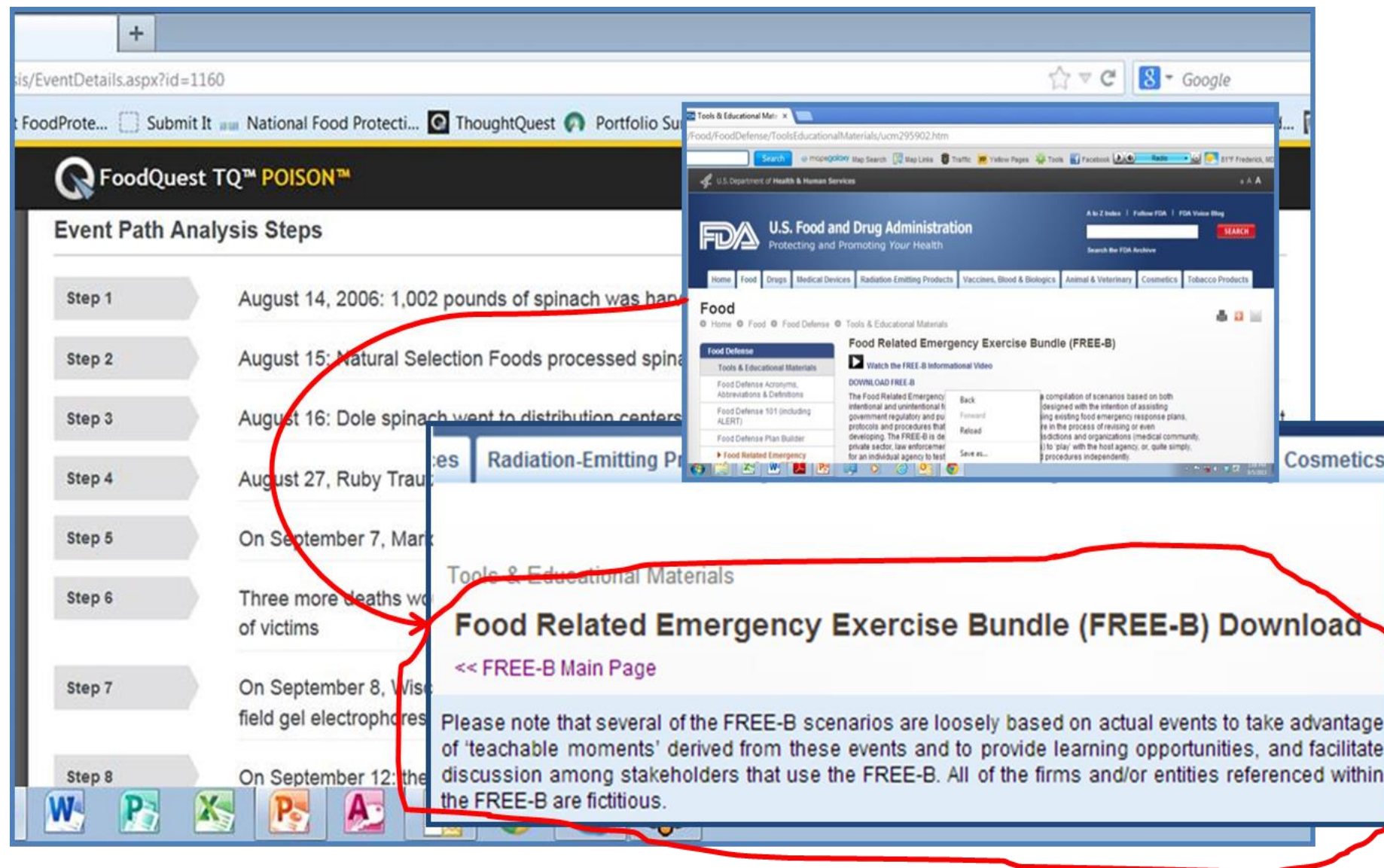
## FoodQuestTQ's POISON Metadata Repository and FDA's Food Related Emergency Exercise Bundle (FREE-B)

Another tool we developed is called POISON. POISON is a metadata repository of intentional and unintentional food events.

As you can see here, POISON is used to develop event path scenarios that are loosely based on real world events to create training simulations for food related emergencies.

The FDA FREE-B tool takes our ideas to do the very same thing. Our research and methods to create the same type of learning simulations duplicated by the FDA pre-dates by over two years the 2011 release of the FDA's FREE-B tool.

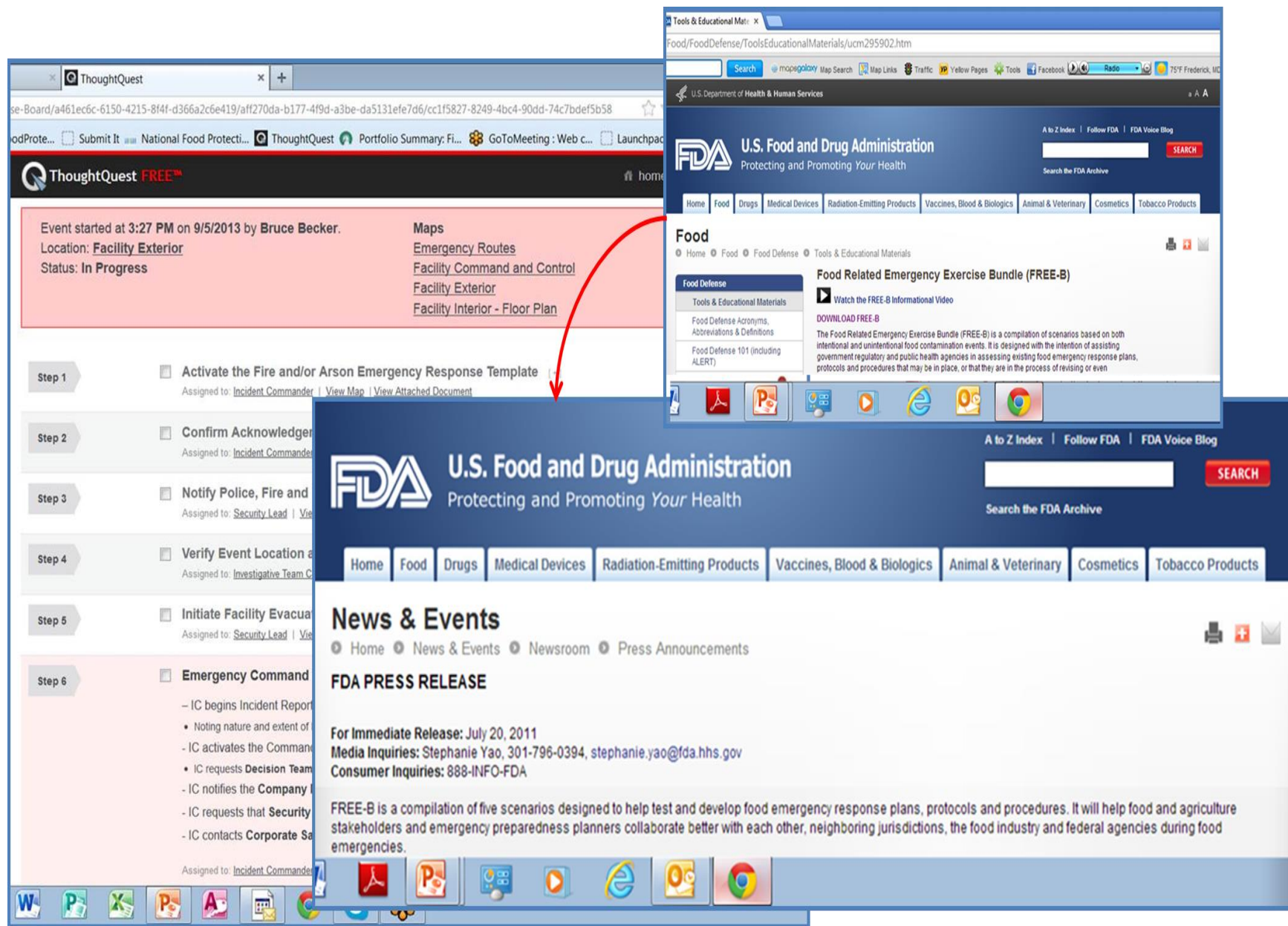
Since the time FREE-B was released by the FDA in 2011 they have established a major grant program for industry, local and state governments to support the conduct of FREE-B exercises free of any charge.





# Examples of FDA Plagiarism of FoodQuestTQ Products

## FoodQuestTQ's FREE (Food Response Emergency Evaluation) Tool and the FDA's FREE-B (Food Related Emergency Exercise Bundle)



In 2010, we developed a new computerized tool to help the food industry test and develop food emergency response plans, procedures and protocols. The new FoodQuestTQ tool was called FREE standing for Food Response and Emergency Evaluation tool.

In July 2011, the FDA released a tool called FREE-B standing for Food Related Emergency Exercise Bundle.

The FDA FREE-B tool plagiarized our use of carefully structured scenarios that were loosely based on real world events to create food emergency preparedness learning environments for improving responses to both accidental and intentionally motivated food emergencies.

The idea of using these types of structured learning environments to improve responses to food emergencies pre-dates the FDA development of their FREE-B tool by over five years.



# Examples of FDA Plagiarism of FoodQuestTQ Products

## FoodQuestTQ's POISON Metadata Repository and FDA's Updates to C.A.R.V.E.R. plus SHOCK

Shortly after 9-11 the FDA decided to use a vulnerability assessment tool that was originally developed by the Army Special Forces in the 1950's to target enemy infrastructures during wartime.

The use of C.A.R.V.E.R. plus SHOCK is now the cornerstone of FDA's counterterrorist efforts in protecting the food supply.

Since the 1950's there have been numerous updates to C.A.R.V.E.R. plus SHOCK but many post 2007 changes contain ideas that are plagiarized from our POISON Metadata Repository and our other FoodQuestTQ tools.

For example, as this slide demonstrates, the FDA has taken our idea of event path steps and simply re-named them as "templates" to disguise the theft of our ideas.

The image shows a screenshot of a computer screen with two overlapping web browser windows. The background window is the FoodQuestTQ POISON Metadata Repository, displaying an 'Event Path Analysis Steps' section with a list of steps: Step 1: Soil, facilities, harvesting or prod; Step 2: Salmonella infect cantaloupes; Step 3: Insufficient sanitation of production; Step 4: Cantaloupes draw i; Step 5: Contaminated canta; Step 6: Cantaloupes are pu; Step 7: Consumers eat the. A red circle highlights the text 'Insufficient sanitation of production' in Step 3. The foreground window is the FDA's 'CARVER + Shock: Enhancing Food Defense' website, showing a search bar, a list of resources, and a table of templates. The table has two columns: 'Template Name' and 'Template Description'. The templates listed are: All Beef Hotdogs Template, Animal Feed Mill Template, Animal Slaughter Template, Apples Template, and Baby Food (Hot Fill) Template. Below the table, there is a text prompt: 'Select the choice in the list below that best describes your operation. Use up and down file. Select the Open button to open the selected template file.'

Template Name	Template Description
All Beef Hotdogs Template	Template All Beef Hotdogs Template Description
Animal Feed Mill Template	Template Animal Feed Mill Template Description
Animal Slaughter Template	Template Animal Slaughter Template Description
Apples Template	Template Apples Template Description
Baby Food (Hot Fill) Template	Template Baby Food (Hot Fill) Template Description



# Examples of FDA Plagiarism of FoodQuestTQ Products

## FoodQuestTQ's POISON Metadata Repository and FDA's Updates to C.A.R.V.E.R. plus SHOCK

EventDetails.aspx?id=7412

FoodQuest TQ™ POISON™

abdominal cramps

Event Path Analysis Steps

Step 1: Soil, facilities, harvesting or production equipment become Salmonella contaminated

Step 2: Salmonella infect cantaloupes

Step 3: Insufficient sanitation of production water supply

Step 4: Cantaloupes draw in contamination water

Step 5: Contaminated cantaloupes are shipped

Step 6: Cantaloupes are purchased by consumers

Step 7: Consumers eat the cantaloupes and become ill

View Visual Event Path Analysis Steps

Planning Description

8

Resources

U.S. Food and Drug Administration

Protecting and Promoting Your Health

Archived Content

For Consumers

Consumer Updates

Animal & Veterinary

Children's Health

Cosmetics

Dietary Supplements

Drugs

Food

Medical Devices

Nutrition

Radiation-Emitting Products

Tobacco Products

Vaccines, Blood & Biologics

Resources for You

Sign up for Consumer Updates by E-mail

On this page

Compendium CARVER

How You Can Enhance Food Security

If Suspected Food Does Not Contain Meat or Poultry

Food safety concerns used to focus solely on accidental contamination. But in recent years, there has been concern that terrorists could intentionally introduce biological, chemical, or radiological agents into the U.S. food supply. A risk-assessment tool called CARVER + Shock helps food processors protect their products from deliberate contamination. A computerized version of the tool will be available on the FDA's Web site in mid-2007.

CARVER was originally developed by the

Source List

Bottle Cleaner

Clean/Sanitize Equipment

Compressed Air

Dishwasher

Disinfecting Equipment

Dry Ice Blaster

Other Cleaning / Washing

Rinsing Equipment

Soaker

Vacuum

Washer

Fruit

Sorter, Grading

Hand Packer

Ref./Fzn Storage

Truck

Here's another example. In our POISON Metadata Repository we build event sequences that consist of each causal step in a process.

Here the FDA has taken our idea of breaking down processes and events into steps to create simulations and analyze food production chains. In this case the FDA has simply added a graphic interface. Another example of intentional plagiarism.

Our ideas of using event paths and production chain sequences pre-dated these updates to C.A.R.V.E.R. plus SHOCK by over two years.



# Examples of FDA Plagiarism of FoodQuestTQ Products

## FoodQuestTQ's POISON Metadata Repository and FDA's Updates to C.A.R.V.E.R. plus SHOCK

The collage consists of three overlapping screenshots. The leftmost screenshot shows the 'FoodQuest TQ™ POISON™' web application. It features a list of steps for a food safety scenario, such as 'Step 1: DISGRUNTLED NIGHT SHIFT LAB EMPLOYEE AT A CHICKEN NUGGET MFG FACILITY PLOTS TO INTENTIONALLY ADULTERATE CHICKEN NUGGETS'. A red arrow points from the 'Step 4' description in this screenshot to the middle screenshot. The middle screenshot shows the FDA's 'U.S. Food and Drug Administration' website, specifically the 'CARVER + Shock: Enhancing Food Defense' section. The rightmost screenshot shows a detailed process flow diagram from the FoodQuestTQ POISON database, featuring various icons and arrows representing the food supply chain. The diagram includes elements like 'Perimeter Fence', 'Factory', 'Nuke', 'Roaster', 'Sorter', 'Blancher', 'Grinder', 'Packager', 'Shipping', 'Receiving', 'Trailer Ship', 'Trailer Truck', and 'Transport'.

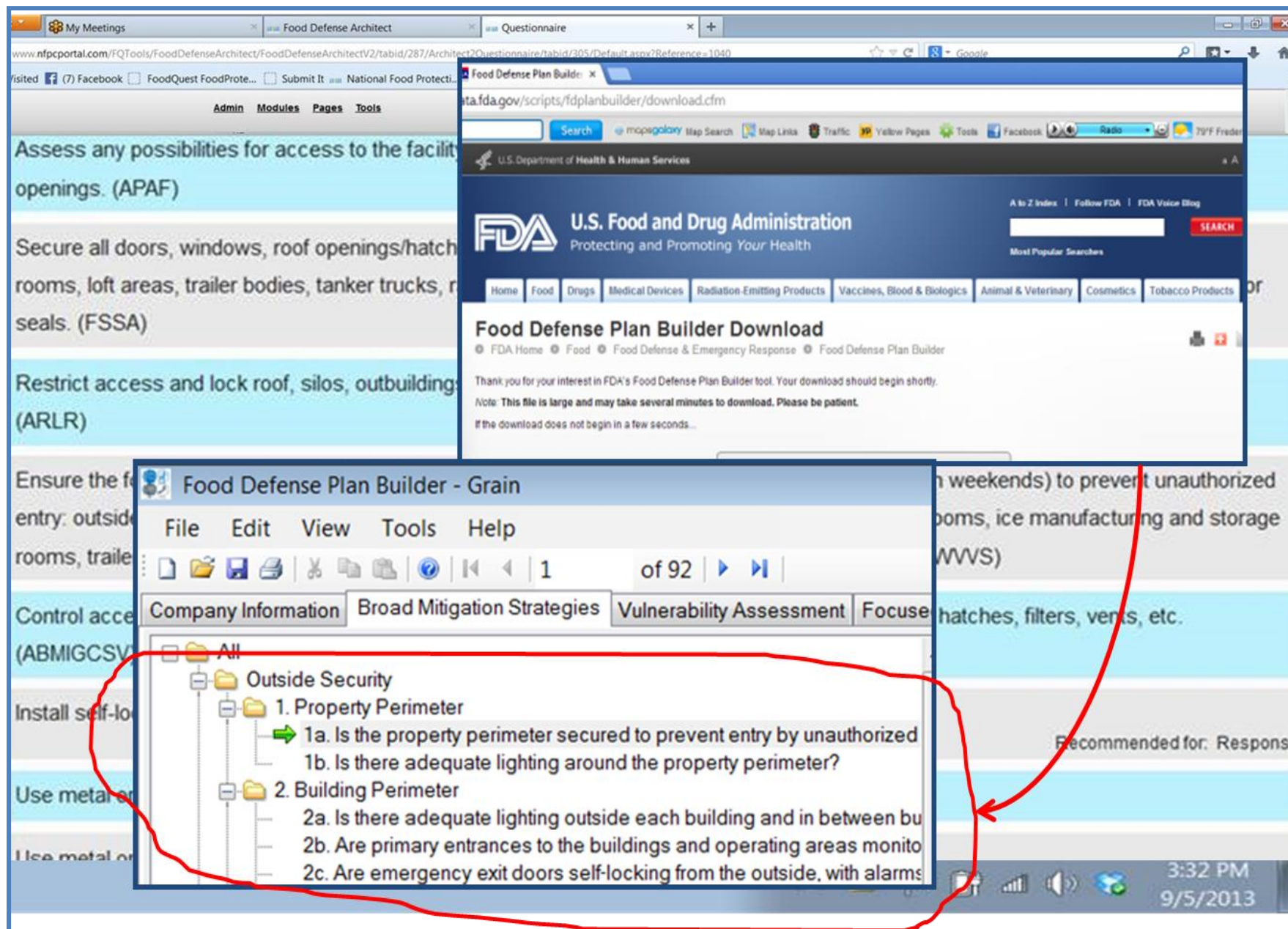
As these screenshots show, the FDA has also taken our idea of expressing the relationships between the different elements of the food supply system as set forth in our POISON database. In this specific case, they have simply added a graphic interface to disguise the idea as their own.

Again, our idea of using event paths and production chain sequences to analyze complex food supply systems pre-dates these FDA updates to C.A.R.V.E.R. plus SHOCK by well over two years.



# Examples of FDA Plagiarism of FoodQuestTQ Products

## FoodQuestTQ's Food DefenseTQ and Architect Tools and FDA's Food Defense Plan Builder



In December 2012, the FDA released their Food Defense Plan Builder tool.

Yet again, the FDA stole our research and the methods we use to create carefully structured questions based on scientifically derived food defense countermeasures.

As these screenshots demonstrate, the FDA took our idea of carefully structuring food defense questions that are based on scientifically derived food defense countermeasures to use as a guide in building food defense plans.

The FDA was already familiar with our Food DefenseTQ and Food Defense Architect tools. They were briefed on the tools over a year earlier.

Again, our research and methods for building food defense plans pre-dated the efforts by the FDA to construct Food Defense Plan Builder by over two years.





We have shared with you only a very few examples of the gross plagiarism being committed by the Food and Drug Administration (FDA) as they work to force FoodQuestTQ out of business.

But to stop the FDA we need your help. If you are interested in supporting our efforts to hold the FDA accountable for violating research integrity and unfairly competing with small business, we ask that you visit the link below to watch the short video and sign our petition calling for action to stop the FDA. Thank-you.

<http://www.youtube.com/watch?v=xKHdJhGLQok>