

NATIONAL SCIENCE FOUNDATION  
OFFICE OF INSPECTOR GENERAL  
OFFICE OF INVESTIGATIONS

## CLOSEOUT MEMORANDUM

Case Number: A-05070046

Page 1 of 1

We received an allegation that three NSF proposals,<sup>1</sup> submitted by the subject,<sup>2</sup> contained text, a figure, and two embedded citations, apparently copied from multiple source documents. The University investigation<sup>3</sup> determined that the subject plagiarized text in the three NSF proposals as well as a fourth NSF proposal.<sup>4</sup> The University concluded that a preponderance of the evidence proved the subject knowingly plagiarized the text in the four NSF proposals. The University reprimanded the subject, requiring him to 1) obtain appropriate training and education; 2) provide certification and assurances for two years that his proposals and reports follow accepted practices; and 3) develop, implement, and deliver a segment on the acceptable practices in citing the work of others for new faculty at the University.

We concur with the University's conclusions. We determined that the subject plagiarized text, a figure and two embedded citations into four NSF proposals. We concluded the subject acted knowingly. We recommended NSF 1) send a letter of reprimand to the subject informing him that NSF has made a finding of research misconduct; 2) require the subject to certify that proposals he submits to NSF do not contain plagiarized, falsified, or fabricated material for 3 years; 3) require that the subject submit assurances by a responsible official of his employer that any proposals submitted by the subject to NSF do not contain plagiarized, falsified, or fabricated material for 3 years; and 4) direct the subject to attend a course in research ethics within 1 year of the final disposition of the case. The NSF adjudicator concurred with our recommendations.

NSF's adjudicator sent the subject a letter of reprimand, required the subject certify for 3 years that proposals or reports submitted to NSF do not contain plagiarized falsified, or fabricated material; require the subject for 3 years to submit assurances by a responsible official of his employer that any proposals or reports the subject submits to NSF does not contain plagiarized, falsified, or fabricated material; and require the subject within 1 year to complete an ethics training course on plagiarism. This memo along with the Deputy Director's letter and our report of investigation constitute the closeout.

This case is closed and no further action will be taken.

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

NATIONAL SCIENCE FOUNDATION  
4201 WILSON BOULEVARD  
ARLINGTON, VIRGINIA 22230



OFFICE OF THE  
DEPUTY DIRECTOR

JAN 28 2008

**VIA CERTIFIED MAIL --RETURN RECEIPT REQUESTED**  
**AND ELECTRONIC MAIL**

*Re: Notice of Research Misconduct Determination*

Dear

In 2003-05, you served as the principal investigator on four proposals submitted to the National Science Foundation ("NSF"). These proposals were entitled,

[REDACTED] and [REDACTED] As documented in the attached Investigative Report prepared by NSF's Office of Inspector General ("OIG"), these proposals contained plagiarized text, plagiarized citations, and a plagiarized figure.

*Research Misconduct and Actions Taken*

Under NSF's regulations, "research misconduct" is defined as "fabrication, falsification, or plagiarism in proposing or performing research funded by NSF ..." 45 CFR § 689.1(a). NSF defines "plagiarism" as "the appropriation of another person's ideas, processes, results or words without giving appropriate credit." 45 CFR § 689.1(a)(3). A finding of research misconduct requires that:

- (1) There be a significant departure from accepted practices of the relevant research community; and
- (2) The research misconduct be committed intentionally, or knowingly, or recklessly; and
- (3) The allegation be proven by a preponderance of evidence.

45 CFR § 689.2(c).

In your proposals, you copied text, citations, and a figure from multiple sources without providing proper attribution for such material. By submitting proposals to NSF that copy the ideas or words of another without adequate attribution, as described in the OIG Investigative Report, you misrepresented someone else's work as your own. Your conduct unquestionably constitutes plagiarism. I therefore conclude that your actions meet the definition of "research misconduct" set forth in NSF's regulations.

Pursuant to NSF regulations, the Foundation must also determine whether to make a *finding* of misconduct based on a preponderance of the evidence. 45 CFR § 689.2(c). After reviewing the Investigative Report and the University's report, NSF has determined that, based on a preponderance of the evidence, your misconduct was knowing and constituted a significant departure from accepted practices of the relevant research community. I am, therefore, issuing a finding of research misconduct against you.

NSF's regulations establish three categories of actions (Group I, II, and III) that can be taken in response to a finding of misconduct. 45 CFR § 689.3(a). Group I actions include issuing a letter of reprimand; conditioning awards on prior approval of particular activities from NSF; requiring that an institution or individual obtain special prior approval of particular activities from NSF; and requiring that an institutional representative certify as to the accuracy of reports or certifications of compliance with particular requirements. 45 CFR § 689.3(a)(1). Group II actions include award suspension or restrictions on designated activities or expenditures; requiring special reviews of requests for funding; and requiring correction to the research record. 45 CFR § 689.3(a)(2). Group III actions include suspension or termination of awards; prohibitions on participation as NSF reviewers, advisors or consultants; and debarment or suspension from participation in NSF programs. 45 CFR § 689.3(a)(3).

In determining the severity of the sanction to impose for research misconduct, I have considered the seriousness of the misconduct; our determination that it was committed knowingly; the determination that it was part of a pattern; your cooperation during the investigation; and the fact that your conduct did not have an impact on the published research record. I have also considered other relevant circumstances. 45 CFR § 689.3 (b).

I find your plagiarism to be serious because the amount of text that you copied was substantial. Moreover, in light of the fact that you submitted to NSF four separate proposals containing plagiarized text, we believe that your plagiarism is part of a pattern of misconduct, as opposed to an isolated incident. However, your conduct did not have a significant impact on the research record and you cooperated fully with the investigation.

I, therefore, take the following actions:

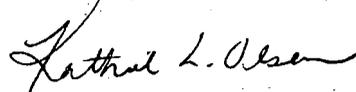
- From the date of this letter through January 1, 2011, you are required to certify that proposals or reports you submit to NSF do not contain plagiarized, falsified, or fabricated material. Such certifications should be sent to the OIG, 4201 Wilson Boulevard, Arlington, VA 22230.

- From the date of this letter through January 1, 2011, you are required to submit assurances by a responsible official of your employer that any proposals or reports you submit to NSF do not contain plagiarized, falsified, or fabricated material. Such assurances should be sent to the OIG.
- You are required to complete an ethics training course on plagiarism by January 1, 2009. You must certify in writing to the OIG that such training has been completed.

*Procedures Governing Appeals*

Under NSF's regulations, you have 30 days after receipt of this letter to submit an appeal of this decision, in writing, to the Director of the Foundation. 45 CFR § 689.10(a). Any appeal should be addressed to the Director at the National Science Foundation, 4201 Wilson Boulevard, Arlington, Virginia 22230. If we do not receive your appeal within the 30-day period, this decision will become final. For your information we are attaching a copy of the applicable regulations. If you have any questions about the foregoing, please contact [REDACTED] at (703) 292-8060.

Sincerely,



Kathie L. Olsen  
Deputy Director

Enclosures

- Investigative Report
- 45 C.F.R. Part 689

Executive Summary

**Allegation:** Plagiarism

**OIG Inquiry:**

- Three proposals to NSF, one of which was funded, contained text, a figure, and two embedded citations, apparently copied from multiple source documents.
- We referred the allegation to the subject's University for investigation.

**University Investigation and Actions:**

- University discovered an additional funded proposal submitted by the PI that contained copied text.
- The University concluded a preponderance of the evidence proved the subject knowingly and recklessly plagiarized the text in the four NSF proposals.
- The University reprimanded the subject. It also required that he: obtain appropriate training and education; provide certification and assurances for two years that his proposals and reports follow accepted practices; and develop, implement, and deliver a segment on the acceptable practices in citing the work of others for the [REDACTED] at the University.

**OIG Assessment:**

- We concur with the University that the subject knowingly plagiarized.

The Act: The subject plagiarized a total of 170 lines of text, a figure, and two embedded citations into four proposals.

Intent: We conclude the subject acted knowingly.

Standard of Proof: The preponderance of the evidence supports the conclusion that the subject knowingly plagiarized these materials into his NSF proposals.

Significant Departure: We concur with the University in concluding the subject's copying represents a significant departure from community standards.

Pattern: The subject submitted five proposals over approximately a two and one-half year period; four of which contained plagiarized material. This supports the conclusion that the subject's actions were a part of a pattern.

**OIG Recommendations:**

Send a letter of reprimand to the subject informing him that NSF has made a finding of research misconduct;

Require the subject to certify that proposals he submits to NSF do not contain plagiarized, falsified, or fabricated material for three years;

Require that the subject submit assurances by a responsible official of his employer that any proposals submitted by the subject to NSF do not contain plagiarized, falsified, or fabricated material for three years; and

Direct the subject to attend a course in research ethics within one year.

OIG's Inquiry

We reviewed three NSF proposals<sup>1</sup> submitted by the subject as the PI. The subject<sup>2</sup> was the sole PI on Proposals 1 and 2, while Proposal 3 had three co-PIs. We determined that, collectively, the three proposals contained at least 150 lines of apparently copied text, 2 copied embedded citations, and 1 copied figure taken from a total of 12 separate source documents. Because the subject was the sole PI on two of the three proposals, we initiated our inquiry by writing only to the subject (Tab 1).<sup>3</sup> The subject responded twice to our request for information (Tab 2).

In his first response, the subject<sup>4</sup> discussed Proposals 1 and 2 on which he was the sole PI. The subject expressed "shock"<sup>5</sup> to learn that these two proposals contained plagiarized materials. He stated that he "acknowledged the work of the authors of six of those seven [source] documents as indicated in the list of references at the end of [his] proposals and their cross-references in the main text."<sup>6</sup> With one of the source documents<sup>7</sup> he explained that "it was dropped from the list of references unintentionally."<sup>8</sup> He further explained that in some instances the citations were not next to the copied text, which "was unintentional."<sup>9</sup> He stated that in proposals to "any funding agencies, including NSF, [he] support[s] [his] proposed projects by quotes from documents in the literature."<sup>10</sup> He explained that copied text was "essentially some definitions (e.g., D1, A2, C2) or some facts (e.g., D2, D3, A1, A3, B1, B3, D4)"<sup>11</sup> which mostly appear in the background sections. He stated that he used his original text in all the research portions of his proposals.

<sup>1</sup> Proposal 1: Funded proposal, [REDACTED] entitled "[REDACTED]" with the subject as the sole PI; Proposal 2: Declined proposal [REDACTED], entitled "[REDACTED]" with the subject as the sole PI; and Proposal 3: Declined proposal [REDACTED], entitled "[REDACTED]" with the subject as the PI and [REDACTED], as co-PIs. These proposals and cross-reference source documents are in Tab 1.

<sup>2</sup> The subject is [REDACTED]. The subject received his Ph.D. degree [REDACTED]. Following the receipt of his degree, he was [REDACTED].

<sup>3</sup> During our inquiry, initially, the three co-PIs on Proposal 3 as well as the PI were considered to be possible subjects. However, as a result of our inquiry, we determined the focus of the investigation should be on the subject as the individual most reasonably responsible for the alleged plagiarism in all three proposals.

<sup>4</sup> Response with email cover, dated August 2, 2005 (Tab 2).

<sup>5</sup> August 2, 2005, response, page 1 (Tab 2).

<sup>6</sup> Ibid.

<sup>7</sup> Source document A with proposals [REDACTED] (Tab 1).

<sup>8</sup> August 2, 2005, response, page 1 (Tab 2). (Note, copied text from source document A appears in both the proposals on which the subject is the sole PI (Proposals 1 and 2). The subject states the reference for source document A was originally in the proposals, but was dropped from the reference lists.

<sup>9</sup> Ibid, page 1.

<sup>10</sup> Ibid, page 2.

<sup>11</sup> Ibid, page 2.

The subject's second response, a joint response with one of the three co-PIs,<sup>12</sup> discussed Proposal 3. It stated that three of the five source documents<sup>13</sup> were acknowledged in the proposal's list of references. The two missing references were mistakenly left out of the proposal.<sup>14</sup> In this response, they provided several reasons to explain some of the copied text, such as 1) certain portions of the text were moved to the end of the proposal, leading to a missing reference for that section; 2) the authors of one of the source documents had another paper that was cited; 3) one section used was not claimed to be "a part of the intellectual merit developed during the course of our proposed project."<sup>15</sup> Their response stated the desire "to explicitly clarify that the underlined texts under investigation are either definitions (e.g. I1, H), facts (e.g. H1, J1, L), or well-known algorithms (e.g., K) in the field of Wireless Sensor Networks."<sup>16</sup> They stated that all the main contributions, the intellectual merit, and the plan of work in the proposal, were original ideas. They emphasized that there was no intention to omit acknowledgments.

The subject's responses did not dispel the allegation. We determined that there was sufficient substance to warrant an investigation, and referred the investigation to the subject's University (Tab 3).<sup>17</sup>

#### University's Investigation

The University's Committee Investigation Report (the Report) is attached (Tab 4). During the investigation, the Committee requested, via its University's representative,<sup>18</sup> that our office review the subject's most recently submitted NSF proposal (Proposal 4)<sup>19</sup> for possible copied materials.<sup>20</sup> We did so, writing to the University<sup>21</sup> and providing a copy of Proposal 4 with the 18 lines of apparently copied text underlined and cross-referenced to possible source documents (A through F).<sup>22</sup>

The University's representative provided us with a copy of the letter<sup>23</sup> he sent to the subject about Proposal 4<sup>24</sup> as well as a copy of the subject's response.<sup>25</sup> The subject's response described two of

<sup>12</sup> (Tab 2) Response with email cover, dated August 13, 2005. The email cover with the attachment was copied to one co-PI, [REDACTED]. There is no explanation as to why the other two co-PIs, also from the subject's University, were not included in this or any other responses..

<sup>13</sup> Source documents H, J, and K.

<sup>14</sup> Source documents I and L.

<sup>15</sup> Tab 2, August 13, 2005, response, page 1.

<sup>16</sup> Ibid, page 2

<sup>17</sup> Our referral letter was directed to [REDACTED]

<sup>18</sup> [REDACTED]  
<sup>19</sup> NSF Proposal 4, [REDACTED], entitled "[REDACTED]" submitted by the subject as the PI and [REDACTED] a co-PI from [REDACTED]

<sup>20</sup> On February 2, 2006, we received an email from [REDACTED], misconduct official at the University, requesting a plagiarism review of the subject's Proposal 4, which was pending at the time of this request. (Tab 5, Section A)

<sup>21</sup> Tab 5, Section B

<sup>22</sup> We evaluated NSF Proposal 4 and provided the information to the Committee to evaluate more thoroughly (Tab 5, Sections C and D).

<sup>23</sup> We reminded the University that the subject had not had an opportunity to respond to the alleged copied text annotated in Proposal 4 as he had with Proposals 1, 2, and 3. Hence, the University wrote to the subject specifically about Proposal 4 to provide him with this opportunity.

<sup>24</sup> Tab 5, Section E, letter to subject from [REDACTED], dated March 23, 2006.

the six source documents as material he originally wrote.<sup>26</sup> His response about the other four source documents was similar to his initial responses discussed above.

The Committee reviewed all the documents and interviewed the subject. It determined that the subject plagiarized materials knowingly and recklessly based on the preponderance of the evidence. Further, it determined that the subject's actions were a significant departure from accepted practice and were part of a pattern of behavior over an extended period of time. However, the Committee did suggest that the subject may not have had a full understanding of the rules of citations because a significant portion of his formal education took place in a foreign country.

The Committee's report is cursory in that it does not appear that the committee took extensive notes regarding its interview of the subject nor did they provide extensive reasoning for the conclusions they made. However, it did appear to perform an adequate review of the material that resulted in a reasonable conclusion. As a result, the Committee determined that the subject committed research misconduct.

The committee recommended that:

1. the subject receive a letter of reprimand from the Chancellor, a copy of which be placed in the subject's personnel file;
2. the subject get appropriate training and education in this matter, provide description and evidence of the training to the appropriate people at the University, and certify to each of these that he completed this training successfully;
3. the subject provide certifications and assurances to the chair of his department for 2 years that his proposals and reports follow accepted practices with regard to citing the work of others; and
4. the subject develop, implement, and deliver a segment on the acceptable practices in citing the work of others for the [REDACTED] at the University.

The Chancellor accepted the Committee's report and recommendations. He sent a letter to the subject on May 2, 2006 (Tab 4, Section A), finding that the subject committed research misconduct, specifically plagiarism, and imposed the actions recommended by the Committee.

#### OIG's Assessment

NSF's Research Misconduct Regulation states that a finding of misconduct requires:

- (1) There be a significant departure from accepted practices of the relevant research community; and
- (2) The research misconduct be committed

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<sup>25</sup> Tab 5, Section F, response from subject to [REDACTED], dated March 31, 2006.

<sup>26</sup> The subject's response to the University's request for an explanation of the copied text in Proposal 4 revealed the subject was the original author of source documents A and D. These are in the book, [REDACTED], entitled "[REDACTED]"

intentionally, or knowingly, or recklessly; and (3) the allegation be proven by a preponderance of the evidence.<sup>[27]</sup>

We evaluated the information provided in the University's Report (Tab 4, Section A) as part of our own investigation. The Report contained no information about the Committee's interview of the subject. At our request, the University provided us with handwritten notes taken during the interview (Tab 4, Section B). Also, the Committee had not interviewed the co-PIs as a part of its investigation. Therefore, we requested, and the University agreed, to interview the co-PIs. The University's summary of the interviews is located at Tab 4, Section C.

The University also did not provide the subject with a copy of the draft Report for his comments. We wrote to the subject, providing him with a copy of the Report and explaining that as part of our independent investigation,<sup>28</sup> we would appreciate any comments he might have about the Report. Our letter and the subject's response are included at Tab 6. The subject's response did not provide any further information regarding his actions.

In evaluating his various responses, we note that in some instances the subject included the citation for the copied text within the text or elsewhere in his proposals. However, he has not appropriately distinguished the copied materials he used in the proposals from his own words and figures. Consequently, he is neither providing appropriate credit for the source of these copied materials, nor is he providing the reader with the knowledge that these words and this figure are not his. Rather, he is presenting these words as his own work. In the four proposals, there are, combined, approximately 170 lines of plagiarized text, a figure, and 2 embedded citations, all presented as if they were the subject's own work.

We note that in another of the subject's NSF proposals (a fifth proposal),<sup>29</sup> the subject clearly distinguishes and appropriately cites two separate paragraphs of text (Tab 7).<sup>30</sup> This proposal was submitted before our inquiry was initiated. Therefore, the evidence suggests that the subject understood what constitutes appropriate citations.

The Committee stated that the subject:

was not sufficiently knowledgeable in the accepted practices regarding citing the work of others, because a significant part of his formal education was conducted in a foreign country.<sup>[31]</sup>

We disagree and note that although the subject did complete a significant portion of his training in a foreign country, he received his Ph.D. from an accredited U.S. institution, at which he acted as a teaching and research assistant for four years while completing his degree. Subsequently, he

<sup>27</sup> 45 CFR § 689.2(c).

<sup>28</sup> NSF Research Misconduct Regulation (45 CFR part 689).

<sup>29</sup> (Tab 7) NSF proposal [REDACTED], entitled "[REDACTED]" was submitted by the subject as the sole PI [REDACTED]. This proposal was submitted after NSF proposals [REDACTED] but before NSF proposals [REDACTED] and [REDACTED], each of which contained plagiarized materials.

<sup>30</sup> Tab 7, page 1 ("Introduction") of proposal [REDACTED]

<sup>31</sup> Tab 4, Section A, 12 April 2006 Report, page 2.

two years as an Assistant Professor at a state university, and four more years at his present institution where he was an Assistant Professor. The subject trained and taught in the U.S. for a total of 10 years prior to his submission of the NSF proposals which contained copied text. We consider 10 years to be more than enough time for the subject to have learned and understood what the accepted practices are regarding the citation of the work of others. Further, the subject has published over this same period of time chapters in two separate books, a manual, and three articles in peer reviewed journals (Tab 8).

We also note that although the subject claimed that he only copied "essentially some definitions (e.g., D1, A2, C2) or some facts (e.g., D2, D3, A1, A3, B1, B3, D4),"<sup>32</sup> a review of some of these sections counters his claim. For example, Proposal 2, pages 5 and 6, the first 37 lines of text consist of about 31 lines of copied text; and Proposal 3, pages 10 and 11, a section of 43 lines of text and one figure contain about 40 lines of copied text as well as the copied figure. We consider this extensive and continuous copied text from different sources to be far more than the copying of definitions and facts. Instead, it is blatant plagiarism of others' intellectual efforts in producing the text and figure.

Finally, at our request the University reconvened the Committee to include the co-PIs as part of its investigation. The Committee determined that none of the co-PIs acted at a level of intent that could be considered research misconduct under federal regulations.<sup>33</sup> We concur with its conclusion.

#### The Act

The Committee concluded by a preponderance of the evidence that the subject inappropriately copied materials from multiple sources into four NSF proposals. We concur with the Committee's assessment. Our inquiry estimated the subject copied, in Proposals 1, 2, and 3, a total of approximately 150 lines of text, 1 figure, and 2 embedded citations taken from 12 separate source documents. Further, as a result of the University's investigation, we determined that the subject copied text into Proposal 4 from four additional sources (source documents B, C, E, F, see Tab 5). This added about 18 more lines of text, bringing the total copied materials in four proposals to about 170 lines of text, 1 figure, and 2 embedded citations taken from 16 separate source documents. The total amount of copied text is significant, representing more than 4 pages of text in all (see table below).

<sup>32</sup> Tab 2, 2 August 2005 response, page 2.

<sup>33</sup> The Committee determined (Tab 4, Section C) in its follow-up investigation that [REDACTED], who was co-PI on declined proposal [REDACTED], acted carelessly when he allowed the work of a graduate student who assisted with the preparation of background material for the proposal to be forwarded to the subject without [REDACTED] close review. As a result, the University required that [REDACTED] participate with the subject in the development, implementation, and deliverance of a segment on the acceptable practices in citing the work of others for the [REDACTED] University.

<i>Proposal</i>	<i>Number of Lines</i>	<i>Number of Figures</i>	<i>Number of Embedded Citations</i>	<i>Total Amount Funded</i>
1	42	0	1	\$ [REDACTED]
2	48	0	1	0
3	62	1	0	0
4	18	0	0	\$ [REDACTED]
<i>Totals</i>	<i>170</i>	<i>1</i>	<i>2</i>	\$ [REDACTED]

Further, two of the proposals were funded (Proposals 1 and 4). Proposal 1, a 2-year award, was funded prior to the investigation.<sup>34</sup> The budget for the 2-year award was modest with funds primarily for graduate students, equipment and travel. Proposal 4 was pending at the time of the investigation, but was awarded just prior to the conclusion of the investigation.<sup>35</sup>

We requested that each program officer involved with the recommendation for funding for each of these proposals review the annotated and cross-referenced copies of the relevant proposal and determine if the copied materials played a role in the decision to fund the proposal. Both program officers concluded that none of the copied text was material to the funding decision (Tab 9).

#### Intent

The Committee concluded that the subject knowingly and recklessly copied text into his NSF proposals. We agree the subject knowingly copied text, embedded citations, and a figure into his proposals. To further support the level of intent as knowing, the fifth proposal discussed earlier (Tab 7, see footnote 37) clearly shows the subject knows how to appropriately quote text and distinguished it from his own in his proposals.

#### Standard of Proof

We conclude the preponderance of the evidence indicates that the subject copied these materials into his proposals without appropriately distinguishing the text or figure from his own work. In addition, the preponderance of the evidence indicates that the subject copied an embedded citation to a reference into two of his proposals exactly as it was presented in the source document with the text he copied, suggesting that he used this reference to develop the text, which he did not. In copying text, two embedded citations, and a figure, the subject significantly departed from the accepted practice of the research community. Since the preponderance of evidence supports the conclusion that the subject acted knowingly when he copied these materials, we conclude the subject committed plagiarism and therefore committed research misconduct.

#### OIG's Recommended Disposition

In deciding what actions are appropriate when making a finding of research misconduct, NSF must consider several factors. These factors include how serious the misconduct was; whether it was an

<sup>34</sup> Proposal 1 expired in August 2006.

<sup>35</sup> Proposal 4 was funded on February [REDACTED] 2006, and expires January 31, 2009.

isolated event or part of a pattern; its impact on the research record; and other relevant circumstances.<sup>36</sup>

### Seriousness

As noted above, the preponderance of evidence supports the conclusion that the subject acted knowingly when he copied verbatim text into his proposals, a significant departure from the accepted practice in the research community. Plagiarism strikes at the heart of research integrity and is an unacceptable practice within the research community. In addition,

NSF expects strict adherence to the rules of proper scholarship and attribution. The responsibility for proper attribution and citation rests with authors of a proposal; all parts of the proposal should be prepared with equal care for this concern. Serious failure to adhere to such standards can result in findings of research misconduct. NSF policies and rules on misconduct in science and engineering are discussed in *Grant Policy Manual* (GPM) Section 930 as well as in 45 CFR Part 689. (GPG section I.B.(10/2003)).

The amount of plagiarized text was considerable and substantive, representing the equivalent of over four pages of copied text. In addition, the two citations incorporated as part of the plagiarized text<sup>37</sup> suggest that the subject copied and pasted these sections of text. Further, in each case, these embedded citations were only used once within the plagiarized text suggesting that the subject may never have even read either reference. The embedded citations, in conjunction with the copied figure, enhance the seriousness.

### Mitigating Factors

The subject cooperated fully with both the University's investigation and our office's inquiry and investigation.

### Pattern

The subject submitted five proposals over approximately a 2 ½-year period, four of which contained plagiarized material. This suggests that the subject's actions were a part of a pattern.

### Impact on the research record

There is no evidence of any impact on the research record as a result of the plagiarism in the proposals submitted to NSF.

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<sup>36</sup> 45 CFR § 689.3(b).

<sup>37</sup> Proposal 1, page 8, citation # 11, and Proposal 2, page 13, citation # 7.

Recommendations

Based on the evidence, OIG recommends that NSF:

- send a letter of reprimand to the subject informing him that NSF has made a finding of research misconduct;
- Require the subject to certify that proposals he submits to NSF do not contain plagiarized, falsified, or fabricated material for 3 years;
- Require that the subject submit assurances by a responsible official of his employer that any proposals submitted by the subject to NSF do not contain plagiarized, falsified, or fabricated material for 3 years; and
- direct the subject to attend a course in research ethics within 1 year of the final disposition of the case.

The subject's certifications and proof of an ethics course should be sent to the Associate Inspector General for Investigations for retention in OIG's confidential file on this matter.