



NATIONAL SCIENCE FOUNDATION
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS

CLOSEOUT MEMORANDUM

Case Number: A11040026

Page 1 of 1

Closeout

We received a substantive allegation that a PI¹ (Subject) plagiarized text in an NSF Proposal.² We referred the investigation to the University,³ which communicated with a grant writer who assisted the Subject and reviewed other documents and proposals. The University concluded, based on a preponderance of the evidence, that the Subject committed plagiarism in two NSF Proposals.⁴

We could not accept the University's Report in its totality, and we therefore conducted our own investigation. We wrote to the grant writer to obtain previous versions of the first NSF proposal and to analyze the second NSF Proposal. Despite the Subject stating first that software deleted his quotation marks and later stating that he did not know about quotation marks, we found that earlier versions of the first NSF proposal had contained other properly cited and quoted material, deleted during editing. Based on the preponderance of the evidence, we concluded that the Subject knowingly plagiarized in his NSF Proposal, which we deemed a significant departure from accepted practices and recommended actions to protect federal interests. The Senior Advisor to the Director concurred with our recommendations.

This memorandum, the attached Report of Investigation, and the Senior Advisor's letter constitute the case closeout. Accordingly, this case is **closed**.

[REDACTED]

National Science Foundation Office of Inspector General



Report of Investigation Case Number A11040026

March 27, 2013

**This Report of Investigation is provided to you
FOR OFFICIAL USE ONLY.**

It contains protected personal information, the unauthorized disclosure of which may result in personal criminal liability under the Privacy Act, 5 U.S.C. § 552a. This report may be further disclosed within NSF *only* to individuals who *must* have knowledge of its contents to facilitate NSF's assessment and resolution of this matter. This report may be disclosed outside NSF *only* under the Freedom of Information and Privacy Acts, 5 U.S.C. §§ 552 & 552a. Please take appropriate precautions handling this report of investigation.

Executive Summary

Allegation: Plagiarism.

OIG Inquiry: OIG identified 8 sources from which approximately 87 lines and 23 embedded references were copied into an NSF proposal (Proposal1) that had only one PI (Subject). The subject asserted that format conversion caused quotation marks and citations to disappear while sending Proposal1 to a university grant writing assistant. OIG referred investigation of the matter to the Subject's university (University).

University

Investigation: The University examined another NSF proposal (Proposal2) and determined it also contained plagiarized text. During the University's investigation, the Subject argued that he had not understood that quotation marks should be used. The University concluded that research misconduct had occurred.

OIG

Investigation: OIG analyzed Proposal2 and concurred that it contained plagiarized text: 38 lines with 3 embedded references from 5 sources. We also contacted the grant writer, who provided us with previous versions of Proposal1. We found no evidence of inadvertent deletions, but found evidence that the Subject understood the need to use quotation marks.

OIG

Assessment:

- **The Act:** The Subject plagiarized 125 lines from 13 sources into 2 NSF proposals.
- **Intent:** The Subject acted knowingly.
- **Standard of Proof:** A preponderance of evidence supports the conclusion that the Subject committed knowing plagiarism.
- **Significant Departure:** The Subject's plagiarism represents a significant departure from accepted practices of the research community.
- **Pattern:** The Subject's actions demonstrate a pattern of plagiarism.

OIG

Recommends:

- Make a finding of research misconduct against the Subject.
- Send the Subject a letter of reprimand.
- Require certifications from the Subject for a period of 2 years.
- Require assurances from the Subject's employer for a period of 2 years.
- Require proof of completion by the Subject of an RCR training program within 1 year.
- Ban the Subject from participating as a reviewer, advisor, or consultant for NSF for a period of 2 years.

OIG's Inquiry

We conducted an inquiry into an allegation of plagiarism in an NSF proposal (Proposal1).¹ Our review identified 87 lines and 23 embedded references apparently copied from 8 sources.² We contacted the PI³ (Subject) about the allegation.⁴

In his response,⁵ the Subject explained that his use of LaTeX software caused formatting errors while sending and receiving drafts from a university grant writer. He stated that the LaTeX conversions caused the quotation marks to disappear, along with phrases such as "As shown by."⁶ The Subject's claim that he had originally quoted large blocks of text lacked credibility. In addition, the subject did not provide evidence of drafts to show that sufficient citation originally existed. We concluded that a full investigation of the Subject's actions was warranted. Consistent with our regulation,⁷ we referred the investigation to the Subject's University.⁸

University Investigation

The Research Integrity Officer (the RIO),⁹ consistent with University policy,¹⁰ assembled a committee (the Committee) to conduct the investigation and produce an investigation report (the Report).¹¹

Because the Subject blamed the lack of proper attribution on the LaTeX-formatted PDFs exchanged with a University grant writer (the Grant Writer), the RIO contacted the Grant Writer¹² to obtain more information. According to the Report, the Grant Writer "indicated that she converted files between Word and Adobe Acrobat, but did not feel that this would result in loss of quotation marks or references."¹³ Elaboration or documentation of that conversation was not included with the Report.

The Committee examined Proposal1 and its alleged sources and produced a brief summary analysis.¹⁴ It stated that "there is far, far too much duplication of material from many sources, whether cited or not"¹⁵ and that the Subject "must have been aware" that others' wording had to be properly attributed.¹⁶ The Committee concluded that "there was substantial

¹ Tab 1: [REDACTED] (Declined).

² Tab 2.

³ [REDACTED]

⁴ Tab 3.

⁵ Tab 4.

⁶ Tab 4 NSF Inquiry Response, p. 2.

⁷ 45 C.F.R. part 689.

⁸ [REDACTED] Tab 5 contains the referral letter.

⁹ [REDACTED]

¹⁰ See Tab 6, [REDACTED].

¹¹ Tab 7.

¹² [REDACTED]

¹³ Tab 7, p. 3. (p. 5 of PDF)

¹⁴ Tab 8 Attachment C.

¹⁵ Tab 8 Attachment C, p. 2.

¹⁶ Tab 8 Attachment C, p. 2.

and egregious duplication from articles with insufficient or missing attribution¹⁷ that constituted a significant departure¹⁸ from accepted practices in the Subject's field. It further concluded the act was committed with a level of intent requisite for research misconduct, though the Committee did not specify at which level.

The Subject submitted a response to the Committee's analysis,¹⁹ stating that he either "carelessly deleted" the reference or made a "careless" mistake in forgetting the reference.²⁰ He also wrote that he was not desperate for a grant and therefore "had no motivations or reasons to intentionally plagiarize."²¹ He continued, stating that "the large amount of psychological and mental pressure of meeting deadlines led to the occurrence of these unintentional mistakes and for not reviewing the reference list and [LaTeX] text of the proposal."²² He reiterated that the LaTeX conversion caused inadvertent deletions during editing. The Committee determined that the Subject's response did not alter its conclusions.²³

At our request to evaluate pattern, the RIO and another University Official (the Director)²⁴ analyzed other documents authored by the Subject and identified possible plagiarism in another NSF Proposal (Proposal2)²⁵ and in the Subject's dissertation.²⁶ The Subject sent a letter to the RIO responding to allegations of plagiarism in Proposal2.²⁷ In it, he objected to the composition of the Committee, due to a perceived conflict of interest; he also challenged the fact that the Committee had raised allegations of research misconduct in a proposal, asserting "[t]he research proposal was not a publication, but a proposal aimed at extending results of two publications."²⁸

The University determined the Committee should review the alleged plagiarism in Proposal2 but that the investigation of the dissertation should be handled separately, since it pertained to the Subject's time as a student at the University. In a summary analysis of Proposal2,²⁹ the Committee concluded it "contains an unacceptable degree of use of other authors' wording, sentences and paragraphs without quotation marks or adequate citation. This constitutes plagiarism."³⁰ The Committee recommended that:

- 1) The Subject undergo training, and

¹⁷ Tab 8 Attachment C, p. 2.

¹⁸ Tab 8 Attachment C, p. 2.

¹⁹ Tab 8, Attachment A.O. (Though the Report indicates this is Attachment D, we did not receive it labeled as such.)

²⁰ Tab 8, Attachment A.O. Terms appear throughout pages 1 and 2.

²¹ Tab 8, Attachment A.O., p. 4.

²² Tab 8, Attachment A.O., p. 6.

²³ Tab 7, p. 2. (p. 4 of PDF)

²⁴

²⁵

[REDACTED] (Declined)

²⁶ The dissertation fell outside our jurisdiction, so while it may be evaluated when considering pattern, we did not seek details of the findings to include in our investigation.

²⁷ Tab 8, Attachment F.

²⁸ Tab 8, Attachment F, p. 4.

²⁹ Tab 8, Attachment E.

³⁰ Tab 8, Attachment E, p. 5.

- 2) The Subject be barred from submitting proposals for two years, after which he must submit with a co-PI for three years and have all proposals screened with plagiarism checking software.

The Subject sent a response³¹ to the Committee's second analysis via his attorney.³² In the response, the Subject stated his objections to the members selected for the Committee asserting that they lacked "experience adjudicating plagiarism claims"³³ and "expertise investigating plagiarism cases"³⁴ as well as the fact that two of the members had been "embroiled in public controversy"³⁵ with the Subject's close colleague. On the last point, the Subject expressed that, at the very least, the two Committee members in question created the appearance of a conflict of interest. The Subject also objected to the terms used by the Committee, stating that it used a "non-existent standard it termed 'extremely egregious'"³⁶ instead of employing existing culpability standards.³⁷ The response concluded by saying that the Subject had been previously unaware of proper citation practices and therefore only remedial sanctions were appropriate.³⁸

The Committee submitted a formal response to the Subject's comments.³⁹ It addressed the appearance of conflict of interest, stating that it had "deliberated this matter objectively", finding that the two Committee members in question "had only very limited interaction with" the Subject prior to the investigation.⁴⁰ The Committee also asserted that the definitions for the qualifying terms ("moderately egregious, egregious, and extremely egregious"⁴¹) were defined in the analysis of Proposal 2.⁴² It provided an example that fit the term "highly egregious", stating that "[w]e view this plagiarism as highly egregious because tracts totaling 311 words with 264 duplicated from this source without the appropriate reference or quotation marks [sic]."⁴³ The Committee further stated that it agreed that the sanctions should be remedial and emphasized that its recommendations were consistent with those at other universities for similar actions.

The RIO concurred with the Committee's findings, stating that preponderance of the evidence supported evidence of intentionality.⁴⁴ The RIO accepted the Committee's recommendations, adding that for the three years following the two-year ban, the Subject and his co-PI(s) must also submit written assurances.

³¹ Tab 8, Attachment D, "Attorney Brief".

³² [REDACTED]

³³ Tab 8, Attachment D, p. 5.

³⁴ Tab 8, Attachment D, p. 6.

³⁵ Tab 8, Attachment D, p. 6.

³⁶ Tab 8, Attachment D, p. 5.

³⁷ Tab 8, Attachment D, p. 15.

³⁸ Tab 8, Attachment D, p. 20.

³⁹ Tab 8, Attachment G.

⁴⁰ Tab 8, Attachment G, p. 1.

⁴¹ Tab 8, Attachment G, p. 2.

⁴² We did not find any definitions in any of the reports.

⁴³ Tab 8, Attachment G, p. 2.

⁴⁴ Tab 7, p. 5. (p. 7 of PDF)

The Subject appealed the findings and the matter was adjudicated by the Provost.⁴⁵ In her determination letter,⁴⁶ the Provost wrote, “[w]hat most concerned the [Committee] and supported their finding of plagiarism were the numerous examples of substantial duplication of other authors' work, without the use of quotation marks, adequate citation or reference.”⁴⁷ She noted that when the RIO first told the Subject via telephone who the Committee members were, he did not object; instead, he objected after receiving a draft of the Committee’s analysis of Proposal1, which concluded misconduct had occurred.⁴⁸ She concluded that the preponderance of evidence supported the RIO’s and the Committee’s findings and accepted their recommendations.

OIG’s Assessment of the University Report

We assessed the Report for accuracy and completeness and whether the University followed reasonable procedures in its investigation.⁴⁹ We found that the University’s Report did not adequately address level of intent for determining a finding of research misconduct based on our regulation. In addition, there was a lack of documentation regarding communication with the Grant Writer or attempts to obtain previous versions of Proposal1. Further, we had difficulty analyzing the University’s iThenticate analysis of Proposal2.

It was therefore necessary to conduct our own investigation, in order to review Proposal2 and examine previous versions of Proposal1.

OIG’s Investigation

We notified the Subject that we were proceeding with our own investigation and requested that he send us a CV, an explanation for the apparently copied text in Proposal2, and a description of his understanding of plagiarism before receiving our inquiry letter.⁵⁰ We also invited his comments on the University Report.

Attached to the Subject’s response⁵¹ was the Subject’s CV as well as other supporting documents.⁵² In the letter, the Subject provided extensive comment on the University Report, reiterating his concerns about the perceived conflicts of interest of two Committee members and the Committee’s creation of novel labels to evaluate levels of plagiarism. He objected to the fact that the Committee, as opposed to the RIO, deliberated on its own potential conflict and determined there was none. He argued that the plagiarism found by the University could not have been committed intentionally because “all of the portions of [the Subject]’s proposals that were flagged as suspect were descriptive in nature and part of the background materials presented in

⁴⁵ [REDACTED]

⁴⁶ Tab 9.

⁴⁷ Tab 9, p. 7.

⁴⁸ Tab 9, pages 2, 3, and 8.

⁴⁹ 45 C.F.R. §689.9(a).

⁵⁰ Tab 10.

⁵¹ Tab 11 Letter.

⁵² Tab 11 Attachments.

the proposals.”⁵³ He stated that the words copied into the Proposals “were merely introductory in nature” and that the primary sources of the facts were cited.⁵⁴

With regard to Proposal2, the response primarily directed us to review the Subject’s response⁵⁵ to the University’s allegations about Proposal2. The letter argued that there was no scientific misconduct because the Subject was able to revise Proposal2 in 90 minutes without changing any of the proposed scientific work.⁵⁶ The Subject stated that the “academic merit of the submission”⁵⁷ was therefore unaffected by the presence of copied text.

With regard to Proposal1, the letter says, “[p]rior to the NSF inquiry, [the Subject] did not understand that he was required to use quotation marks even when slight variations to the source material were made.”⁵⁸ We also noted that, in the Subject’s response to the Committee’s analysis of Proposal1, he states that the lack of citation was partly due to at least four other converging deadlines he had occurring simultaneously with Proposal1’s deadline, leading to “the most pressure I had ever in my entire life.”⁵⁹

We reviewed the Subject’s CV and found that he has authored or co-authored more than 16 publications in English-language journals and has received four awarded grants from U.S. Government agencies. In addition, the Subject has two Ph.D. degrees, one from a University in the United States, and one earned elsewhere. Such expansive exposure to research articles and literature (even when earning a Ph.D. elsewhere) increases the likelihood that the Subject was aware of the proper attribution practices.

We wrote⁶⁰ to the Grant Writer, requesting copies of all versions of Proposal1 that were exchanged between her and the Subject. She provided us with five previous versions.⁶¹ From the emails she sent us, their exchange process was clarified: the Subject used LaTeX to create a PDF that he sent to her, she converted the PDF to a Word document, and then she tracked changes and sent the document back to the Subject.

We reviewed the draft documents for the citations, and/or quotation marks that the Subject claimed were deleted by LaTeX, but we did not find evidence these items were ever present. In fact, we found that when the Grant Writer reworded several sections for the Subject, she actually deleted plagiarized text from the Subject’s draft. Based on our review of the documents, the evidence does not support the Subject’s claims regarding LaTeX. For example, in one statement, the subject wrote: “In case of H1, for example, I clearly remember that I had started my sentence with As cited in the recent work of H, and I clearly remember

⁵³ Tab 11 Letter, p. 5.

⁵⁴ Tab 11 Letter, p. 8. We noted that most of the “primary source” citations were due to his 26 embedded references (in-line citations copied along with text from the Sources, which were not themselves cited).

⁵⁵ Tab 8, Attachment F.

⁵⁶ Tab 11 Letter, p. 9.

⁵⁷ Tab 11 Letter, p. 9.

⁵⁸ Tab 11 Letter, p. 10.

⁵⁹ Tab 8, Attachment A.O., p. 6.

⁶⁰ Tab 12.

⁶¹ Tab 13.

that the whole part was italicized [sic].”⁶² With regard to Source H, he later stated, “I did quote it between two commas (Which was again, according to my understanding of paraphrasing, acceptable) and I just forgot to put the reference in.”⁶³ However, our review of previous drafts of the Proposal found that the text copied from Source H never had a citation or prose reference to H, quotation marks, or commas. Most importantly, we found that, in the earliest version of the draft proposal sent to the Grant Writer, the Subject did properly quote and cite a sentence from an academic journal.⁶⁴ Therefore, it appears that the Subject did understand the practice of quoting and citing.

We also reviewed Proposal2⁶⁵ and found 38 lines of improperly attributed text, as well as 3 embedded references from 5 sources. The Subject previously stated that the lack of proper attribution for the largest portion of copied text was a “mistake” due to “carelessness”.⁶⁶ He stated that Source 6 was “inadvertently not cited”⁶⁷ but that he did not use the source in the proposal. He explained that Source 7 was cited as “[37]”, though we found that this was actually an embedded reference and not a reference to the source text. For much of the other text, he argued that the language was common in his field, though we determined that only the sources we located contained the verbatim text. We concluded that the Subject’s explanations for Proposal2 were not adequate to dispel allegations of plagiarism.

OIG’s Assessment

A finding of research misconduct by NSF requires (1) there be a significant departure from accepted practices of the relevant research community; (2) the research misconduct be committed intentionally, or knowingly, or recklessly, and (3) the allegation be proved by a preponderance of the evidence.⁶⁸

The Act

Our review found the Subject copied 125 lines and 26 embedded references from 13 sources into 2 NSF proposals. The Subject’s actions constitute plagiarism and are a significant departure from accepted practices.

Intent

We find that the Subject acted knowingly. During the course of obtaining two doctoral degrees and authoring or co-authoring over a dozen articles, the Subject would have had a great deal of exposure to proper research practices as it relates to attribution of others work. Further, we found evidence that the Subject properly quoted and cited material in the original version of Proposal1, though it was deleted during editing. This demonstrates that the Subject was aware of

⁶² Tab 4 NSF_Inquiry Response, p.4.

⁶³ Tab 8, Attachment A.O., p. 2.

⁶⁴ See Tab 13, Document 1, p. 2. The quoted and cited sentence is indicated by an asterisk and red highlighting. The paragraph containing this properly denoted and cited sentence was deleted by the Grant Writer while editing.

⁶⁵ Tab 14, Annotated Proposal.

⁶⁶ Tab 14, Copy of Subject Letter, p. 5.

⁶⁷ Tab 14, Copy of Subject Letter, p. 5.

⁶⁸ 45 C.F.R. §689.2(c).

acceptable practices for proper attribution, but chose to ignore those attribution requirements in his NSF proposals. Finally, we note that the Subject's original claim that the quotation marks and other attempts at attribution were inadvertently deleted as a result of a technical computer error, directly conflicted with the Subject's most recent claim that he did not know or understand the need for proper attribution practices. The Subject's conflicting responses strain the credibility of his claim of carelessness.

Standard of Proof

A preponderance of the evidence supports that the Subject committed plagiarism knowingly.

OIG's Recommended Disposition

When deciding what appropriate action to take upon a finding of misconduct, NSF should consider:

- (1) How serious the misconduct was;
- (2) The degree to which the misconduct was knowing, intentional, or reckless;
- (3) Whether it was an isolated event or part of a pattern;
- (4) Whether it had a significant impact on the research record, research subjects, other researchers, institutions or the public welfare; and
- (5) Other relevant circumstances.⁶⁹

Seriousness

In NSF's assessment, the background and literature review sections are vital indicators of a PI's ability to authoritatively summarize previous research to demonstrate expertise and knowledge of the state-of-the-art. Copied text, particularly in the background section of an NSF Proposal, serves to misrepresent a researcher's command of previous research, presenting reviewers with an inaccurate representation of a proposal's respective merit.

Pattern

The evidence supports that the Subject has a pattern of misconduct.

Impact on Research Record

Because we identified no publications containing plagiarism, we conclude there was no discernible impact on the research record.

⁶⁹ 45 C.F.R. § 689.3(b).

Recommendations

Based on the evidence, OIG recommends NSF:

- Send a letter of reprimand to the Subject notifying him that NSF has made a finding of research misconduct;⁷⁰
- Require the Subject to certify to the Assistant Inspector General for Investigations (AIGI) his completion of a responsible conduct of research training program and provide documentation of the program's content within 1 year of NSF's finding.⁷¹ The instruction should be in an interactive format (e.g., an instructor-led course) and specifically include instruction on plagiarism and proper demarcation of verbatim text.

For a period of 2 years as of the date of NSF's finding:

- Bar the Subject from participating as a peer reviewer, advisor, or consultant for NSF.⁷²
- Require for each document (proposal, report, etc.) to which the Subject contributes for submission to NSF (directly or through his institution),
 - the Subject to submit a contemporaneous certification to the AIGI that the document does not contain plagiarism, falsification, or fabrication.⁷³
 - the Subject to submit contemporaneous assurances from a responsible official of his employer to the AIGI that the document does not contain plagiarism, falsification, or fabrication.⁷⁴

⁷⁰ A Group I action (45 C.F.R. §689.3(a)(1)(i)).

⁷¹ This action is similar to Group I actions 45 C.F.R. 689.3(a)(1).

⁷² A Group III action 45 C.F.R. 689.3(a)(3)(ii).

⁷³ This action is similar to 45 C.F.R. 689.3(a)(1)(iii).

⁷⁴ A Group I action 45 C.F.R. 689.3(a)(1)(iii).

NATIONAL SCIENCE FOUNDATION
4201 WILSON BOULEVARD
ARLINGTON, VIRGINIA 22230



OFFICE OF THE
DEPUTY DIRECTOR

NOV 15 2013

CERTIFIED MAIL --RETURN RECEIPT REQUESTED

[REDACTED]

Re: Notice of Research Misconduct Determination

Dear Dr. [REDACTED]:

You submitted two proposals to the National Science Foundation ("NSF") entitled, "[REDACTED]" and "[REDACTED]". As documented in the attached Investigative Report prepared by NSF's Office of Inspector General ("OIG"), these proposals contained plagiarized material.

Research Misconduct and Sanctions

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).

Your proposals contained 125 lines of copied text from 13 sources. By submitting proposals to NSF that copied 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 applicable definition of "research misconduct" set forth in NSF's regulations.

Pursuant to NSF's 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, NSF has determined that, based on a preponderance of the evidence, your plagiarism was committed knowingly 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, and the fact that it was part of a pattern of plagiarism. I have also considered the fact that the plagiarism did not have a discernible impact on the research record, as well as other relevant circumstances. 45 CFR § 689.3(b).

After assessing the relevant facts and circumstances of this case, I am imposing the following actions on you:

- Until September 30, 2015, you must provide certifications to the OIG that any proposal or report you submit to NSF as a Principal Investigator ("PI") or co-PI does not contain plagiarized, falsified, or fabricated material.
- Until September 30, 2015, you must obtain and provide to the OIG assurances from a responsible official of your employer that any proposal or report you submit to NSF as a PI or co-PI does not contain plagiarized, falsified, or fabricated material.
- By September 30, 2014, you must complete a comprehensive responsible conduct of research training course, and provide documentation of the program's content to the OIG. The instruction should be in an interactive format (e.g., an instructor-led course) and should specifically include a discussion on plagiarism and citation practices; and
- Until September 30, 2015, you are prohibited from serving as a reviewer, advisor, or consultant for NSF.

The certifications, assurances, and proof of training should be submitted in writing to NSF's Office of Inspector General, Associate Inspector General for Investigations, 4201 Wilson Boulevard, Arlington, Virginia 22230.

Procedures Governing Appeals

Under NSF's regulations, you have 30 days after receipt of this letter to submit an appeal of this finding, 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 on the finding of research misconduct will become final.

For your information, I am attaching a copy of the applicable regulations. If you have any questions about the foregoing, please contact [REDACTED], at (703) 29[REDACTED].

Sincerely,



Fae Korsmo
Senior Advisor

Enclosures:
Investigative Report
45 CFR Part 689