



CLOSEOUT MEMORANDUM

Case Number: A11040027

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Closeout

We conducted an inquiry into an allegation that a PI¹ (Subject) plagiarized text in an NSF Proposal.² In his response to us, the Subject revealed that a very similar proposal also contained the same copied text.³ We referred an investigation to the University.⁴ In the Subject's interview, he admitted that the unattributed text resulted from the fact that he copied-and-pasted from his former student's dissertation. The University concluded that "for an investigator of his stature and experience",⁵ such a departure from the accepted practices of the research community is "research impropriety",⁶ but not research misconduct.

We found that the University's Report did not fully address NSF's factors for assessing an allegation of research misconduct, nor could we accept the Subject's assurances against further copied text in lieu of a review for a possible pattern. We obtained more information from the Subject about two other NSF proposals in which we had found copied text.⁷ Based on the Subject's answers, we found that the preponderance of the evidence supported the conclusion that the Subject knowingly plagiarized in four NSF proposals, which is a significant departure from accepted practices. We recommended actions to protect the federal interest. The Senior Advisor to the Director concurred with our recommendations.

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

1 [Redacted]

2 [Redacted]

3 [Redacted]

4 [Redacted]

5 University Report [Redacted]

6 University Report [Redacted]

7 [Redacted]

National Science Foundation Office of Inspector General



Report of Investigation Case Number A11040027

March 27, 2013

**This Report of Investigation is provided to you
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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: We initially identified 2 sources from which approximately 59 lines and 9 embedded references were copied into an NSF proposal that had one PI (Subject). In his response to our letter, the Subject revealed that a similar proposal also contained copied text. We referred investigation of the matter to the Subject's university (University).

University

Investigation: During the University's investigation, the Subject revealed more copied material, resulting in a revised total of 84 lines from 7 sources. The unattributed text resulted from the fact that the Subject copied-and-pasted from his former student's dissertation. The University concluded that no research misconduct occurred.

OIG

Investigation: We found two more of the Subject's proposals with copied text. One proposal had approximately 49 lines, and the other had 44 lines from 6 sources. The Subject responded by saying he copied from another former student's dissertation, along with one article.

OIG

Assessment:

- **The Act:** The Subject plagiarized 177 lines from 13 sources into 4 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 assurance 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.
- Bar 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 Proposal1 contained 59 lines and 9 embedded references apparently copied from 2 sources.² We contacted the PI³ (Subject) about the allegation.⁴

In his response,⁵ the Subject admitted to copying the text from the sources. He explained, "Tab A was not cited because A1 is purely literature review on other papers [*sic*] work, not Tab A's work."⁶ For one sentence from Source B, he stated that the text was a commonly used phrase. However, our Internet search revealed no other verbatim matches for the text. He also told us he cited text copied from Source B at certain points, but not others.⁷ We noted that there was a citation to Source B four times over approximately 1.5 pages of copied text and never quotation marks to differentiate text composed by the source author. He also wrote, "I was not clear about the allowance of copies for literature review purposes."⁸

Based on our inquiry, we concluded that there was sufficient evidence to proceed to an investigation of the Subject's actions. Consistent with our regulation,⁹ we referred the investigation to the Subject's University.¹⁰

University Investigation

The Research Integrity Officer (the RIO),¹¹ consistent with University policy,¹² assembled a committee (the Committee) to conduct the investigation. After interviewing the Subject, the Committee and the RIO provided us with a Report¹³ and attachments¹⁴.

The Committee found that while the Subject's "actions fit the technical definition of plagiarism primarily because he failed to distinguish the text of others by indenting or by enclosure in quotes,"¹⁵ his actions did not meet the requisite level of intent for research misconduct. The Committee made this determination based on his cooperation and answers from the interview.¹⁶ The Committee found that the reasons for the improperly attributed text were the

¹ Tab 1: [REDACTED]
[REDACTED] (Declined).

² Tab 2.

³ [REDACTED]

⁴ Tab 3.

⁵ Tab 4.

⁶ Tab 4, p. D-1.

⁷ Tab 4, Throughout.

⁸ Tab 4, p. D-3.

⁹ 45 C.F.R. part 689.

¹⁰ [REDACTED]. Tab 5 contains the referral letter.

¹¹ [REDACTED].

¹² See Tab 6, [REDACTED].

¹³ Tab 7.

¹⁴ Tab 8.

¹⁵ Tab 7, "Enclosure 5: The Final Report," point 4. (p. 26 of PDF)

¹⁶ Tab 7, "Enclosure 5: The Final Report," point 4. (p. 26 of PDF)

Subject's lack of training or knowledge of proper quotation and citation procedures, honest error, and difference of opinion.

The Committee also delineated mitigating factors. First, they found that "the acts of failing to distinguish copied text was limited to the literature search section of [Proposal1] and nowhere else"¹⁷ and therefore were "only to set the stage for the substantive part of [Proposal1] which are the ideas he intended to investigate."¹⁸ In addition, they determined his cooperation indicated that the plagiarism was not intentional: "[the Subject] voluntarily identified seven additional sources of plagiarism."¹⁹ Last, the Committee found that the lack of proper attribution was due to the "substantial aid from a graduate student...."²⁰

The transcript of the Subject's interview reveals that the Subject copied-and-pasted the literature review from the student's Ph.D. thesis into Proposal1, though the student himself was not involved in its preparation. During the interview, the Subject stated, "I prepared the content of the proposal."²¹ He continued, "I think I have two mistakes here. First, I failed to identify in the student...version that he [copied], and also another mistake is I used the student version, condensed it, put it into the NSF proposal."²² We noted the following exchanges:

Committee: "[I]t is a common practice to take paragraphs or whatnot from student dissertations as part of your publications and find out that you picked the wrong paragraph where it hadn't been -- where you saw a citation and thought you were okay and yet again the student may have just taken two paragraphs from the original source."

Subject: "Yes. Correct."²³

Committee: "The problem arose because you basically cut and pasted from a dissertation."

Subject: "Yes. I condensed it because the literature part [from the] student is quite thick...."²⁴

The Committee concluded that "for an investigator of his stature and experience"²⁵ such a departure²⁶ from the accepted practices of the research community is "research impropriety",²⁷ but not research misconduct.

¹⁷ Tab 7, "Enclosure 5: The Final Report," point 6. (p. 26 of PDF)

¹⁸ Tab 7, "Enclosure 5: The Final Report," point 4. (p. 26 of PDF)

¹⁹ Tab 7, "Enclosure 5: The Final Report," point 5. (p. 26 of PDF)

²⁰ Tab 7, "Enclosure 5: The Final Report," point 5. (p. 26 of PDF)

²¹ Tab 8, Attachment J, page 4, line 17. (p. 2 of PDF)

²² Tab 8, Attachment J, page 7, lines 7-12. (p. 3 of PDF)

²³ Tab 8, Attachment J, page 8, lines 13-20. (p. 3 of PDF)

²⁴ Tab 8, Attachment J, page 9, lines 20-25. (p. 3 of PDF)

²⁵ Tab 7, "Enclosure 5: The Final Report," point 4. (p. 26 of PDF)

²⁶ Whether it was "significant" or not was not clear from the report.

²⁷ Tab 7, "Enclosure 5: The Final Report," point 4 (p. 26 of PDF) and "Enclosure 6: [REDACTED]" (p. 29 of PDF).

In evaluating pattern, the Committee relied exclusively on the Subject's assertion that he evaluated his publications/proposals and did not find plagiarism. The Committee concluded:

this represents essentially an isolated incident due to the thorough self-evaluation of previous publications/proposals undertaken voluntarily by [the Subject]. According to [the Subject], he has personally vetted every other document that contained substantial sections written primarily by students (who had not received any training in the responsible conduct of research) within his research program.^[28]

In his interview, the Subject said he would have carefully checked for inappropriately copied text if he had more time. A committee member asked the Subject,

Committee: “[Y]ou have written many, many proposals. Have you copied again from student theses just the way that caused the problem here? Was this a special case or has it been your practice in the past to take directly from students?”

Subject: “No, this is a special case. This one I was in a hurry to write a proposal. This is why I did not check and I used the student and did not carefully check that, leading to this.”²⁹

The Committee made the following recommendations: 1) the Subject should be found to have committed plagiarism in his NSF Proposal; 2) because the Subject's actions were not knowing, his acts constitute research impropriety, not misconduct; 3) the Subject should take Internet-based training in RCR; 4) the Subject should amend any pending NSF proposals that may need quotes for copied text; and 5) two general administrative recommendations for the University.

The Deciding Official concurred with the Committee's findings and the four recommendations pertinent to the Subject.

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.³⁰ We found that the University's Report did not fully address NSF's factors for determining a finding of research misconduct. For example, it is unclear how plagiarism committed at the level of “research impropriety” relates to research misconduct. Furthermore, it was the Subject himself who did the review for pattern and not the Committee. The Committee further found that, because the Subject had “substantial aid from a graduate student who had not received any training in the responsible conduct of research”,^{31,32} the issue of pattern was less relevant in this case.

²⁸ Tab 7, “Enclosure 5: The Final Report,” point 5. (p. 26 of PDF)

²⁹ Tab 8, Attachment J, page 12, lines 12-22. (p. 2 of PDF)

³⁰ 45 C.F.R. §689.9(a).

³¹ The Subject had told them that he copied-and-pasted from the dissertation of a former advisee who had already graduated. (Tab 8, Attachment J, page 9, lines 20-25. (p. 3 of PDF))

³² Tab 7, “Enclosure 5: The Final Report,” point 5. (p. 26 of PDF)

We disagreed in part with factors they weighed substantially. They concluded that plagiarism limited to the literature review was a determinative factor of whether research misconduct occurred. However, NSF does not make a distinction between instances of plagiarism in the background section and instances in other sections in reaching a conclusion about whether misconduct has occurred. Any copied text serves to misrepresent the researcher's knowledge of the field, presenting reviewers with an inaccurate representation of a proposal's respective merit. While the Committee accepted the Subject's statement that the first line from Source B did not need citation, we found only one source that matched the string in question verbatim: Source B. Further, the line in question is a relatively small part of the 1.5 pages of copied text from the source. The Committee's conclusion did not account for the absence of citation for the remainder of Source B.

OIG's Investigation

We notified the Subject that we were proceeding with our own investigation and invited comments on the University's report; he provided no comments.³³

Although the Committee relied exclusively on the Subject's review of his own work for additional plagiarism, we examined 12 more NSF proposals in which the Subject was the sole PI.³⁴ Of those 12, we found a *de minimis* amount of apparently copied text in 10³⁵ of the proposals. Of the two remaining, one (Proposal2³⁶) had 49 lines, 7 embedded references, and 1 embedded typo,³⁷ and the other (Proposal3³⁸) had 44 lines and 4 embedded references.

We wrote to the Subject about Proposals 2 and 3.³⁹ In his reply, he pointed out other proposals that contain material not properly attributed, four of which we had already reviewed as discussed above with one additional.⁴⁰ He replied that the copying was "only for literature review or background introduction".⁴¹ He stated, "I admit that the two proposals ... contain materials from Tab 2A-F, which is violation of NSF rule, although they were used for the purpose of literature review or background introduction."⁴² For Proposal2, he admitted: "I copied the literature review from [a former student]'s thesis..., which contains the indicated source

³³ Tab 9.

³⁴ Some redundancy existed; five of the proposals were substantially similar to at least one other submitted NSF proposal.

³⁵ [Redacted]

³⁶ Tab 10, [Redacted] (Awarded).

³⁷ In the copied text of Proposal2, a dash in the word "net-work" appears. This appears to have resulted from copy-and-paste since the word crossed a line boundary in the source document (and hence a dash appears). This is the only place in Proposal2 where the word "network" has a dash.

³⁸ Tab 10, [Redacted] (Withdrawn).

³⁹ Tab 10.
⁴⁰ Tab 11, [Redacted] (Declined).

⁴¹ Tab 11, p. D-3 of "Response6-27.pdf".

⁴² Tab 11, p. D-3 of "Response6-27.pdf".

documents (Tabs 2A–D).”^{43,44} The Subject said his mistake was the failure to check the student’s work for proper citations before the Subject copied it into his proposal: “The explanation for not properly citing the Tabs C and D is my failure to identify the missing citations in my student’s thesis when using his thesis for the proposal....”⁴⁵ We noted that this contrasts with his statement to the Committee that the act of copying from a student’s dissertation for Proposal1 was a “special case” brought about by an unusual need for haste. He did not address the lack of citation to the student’s dissertation, which was the actual source text he copied. The Subject additionally wrote that Proposal2 contains unquoted material from two additional sources, which he attached to his response as sources G and H.

For Proposal3, he said that almost all of the copied text was from an article describing his work; however, due to “carelessness”,⁴⁶ he failed to cite the article. For a portion of text in Proposal3 copied from Source F, he points out that he cited the paragraph. We concur but note that he did not use quotation marks in any part.

In the letter responding to our questions about Proposals 2 and 3, he also stated that he has received training in research integrity and has now had more than one year to learn about plagiarism. In addition, he wrote that he now understands his mistake in failing to check the student’s literature review for appropriate citation practices. This contradicted his repeated assertions that literature reviews do not warrant the same careful attribution practices given to other subsections.

We also reviewed the Subject’s Biographical Sketch and found he has 25+ years of experience reading and writing scholarly articles. In addition, he has held several research and teaching positions in the United States or Canada since 1987, including teaching positions at prominent universities. According to the website of his department at the University, he has dozens of publications, most of which are in prominent English-language journals within his field; he has also been recognized for distinguished work by more than one American university, signaling that he is an active and productive researcher and would be exposed to American research standards over the years.

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.⁴⁷

⁴³ The former student is [REDACTED]

⁴⁴ Tab 11, p. D-1 of “Response6-27.pdf”.

⁴⁵ Tab 11, p. D-3 of “Response6-27.pdf”.

⁴⁶ Tab 11, p. D-3 of “Response6-27.pdf”.

⁴⁷ 45 C.F.R. §689.2(c).

The Act

Our review found the Subject copied 177 lines from 13 sources into 4 NSF proposals, with 20 embedded references, and one embedded typo. The Subject not only plagiarized from the work of his graduate students, but also from a journal article which summarized some of his previous research. The Subject's actions constitute plagiarism and are a significant departure from accepted practices.

Intent

We find that the Subject acted knowingly. The Subject admitted that he copied-and-pasted from his former students' dissertations. Copying and pasting is an inherently knowing act. He stated numerous times in his letters and in his interview that he did not know the correct citation practices.⁴⁸ However, he also stated in the same letters and interview that his primary mistake was not taking the time to identify whether the student had copied text in his dissertation,⁴⁹ indicating that he knew copied material required special treatment relative to originally composed material. Yet, the Subject chose to ignore those attribution requirements in his NSF proposals. Furthermore, despite being educated outside the United States, the Subject has an extensive record of publication in major English-language journals and extensive teaching experience. Therefore, we conclude the Subject knowingly plagiarized both from his students' dissertations and from another researcher's characterization of his own work.

Standard of Proof

The preponderance of the evidence indicates that the Subject, with his long publication and teaching record in the United States, failed to invoke the recognized conventions of attribution when using another researcher's written statements and/or analyses, even when the researcher is writing about previous literature. We conclude that a preponderance of the evidence supports finding 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.⁵⁰

⁴⁸ For example: Tab 8, Attachment J, page 8, lines 1-5. (p. 3 of PDF)

⁴⁹ Tab 8, Attachment J, page 7, lines 7-12 (p. 3 of PDF) and page 5, lines 4-6. (p. 2 of PDF)

⁵⁰ 45 C.F.R. § 689.3(b).

Seriousness

NSF evaluates the proposal as a whole, treating the background and literature review sections as 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, misrepresents a researcher's command of previous research, presenting reviewers with an inaccurate representation of a proposal's respective merit. It is also problematic that the Subject assured the Committee that no other documents contained plagiarism and that he had only copied from a student's dissertation one time. Our investigation demonstrates these assertions are untrue.

Pattern

The evidence supports that the Subject has a pattern of misconduct that is demonstrated not only by the plagiarism in his other proposals but also in his failed oversight of his students' training in appropriate attribution of sources.

Impact on Research Record and Others

Because we identified no publications containing plagiarism, we conclude there was no discernible impact on the research record. However, the Subject's actions impacted at least two of his NSF-funded students whose copying demonstrates the Subject's lack of oversight and guidance. This lapse in mentoring led to his incorporation of their plagiarism into his proposals.

Other relevant circumstances

We disagree with the mitigating weight the University gave to "his stature and experience," instead considering these aggravating factors. In addition, while responding to questions about Proposals 2 and 3, the Subject told us he had received training in research integrity in the period since our inquiry. However, in the same letter, he continued to assert that citing copied text without quotes is acceptable without addressing whether he should have cited the actual source from which he copied: the student's dissertation. This suggests that the training the Subject previously received did not adequately address the topic of plagiarism and that more training is warranted.

Recommendations

Based on the evidence, OIG recommends NSF:

- Send a letter of reprimand to the Subject informing him that NSF has made a finding of research misconduct;⁵¹
- Require the Subject to certify his compliance with the requirements imposed by the University as a result of its investigation.

⁵¹ A Group I action (45 C.F.R. §689.3(a)(1)(i)).

- 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.⁵² 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. This should be in addition to the training program he completed as required by the University.

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.⁵³
- 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.⁵⁴
 - 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.⁵⁵

Subject's Response to OIG's Draft Investigation Report

The Subject responded to our draft report and reiterated his argument that he was unaware of the need for quotation marks. He also asserted that, because of his intellectual contribution to his students' dissertations, the text he copied into the NSF Proposal from the dissertations required neither citation nor quotes.⁵⁶ However, his admission that he failed to carefully check the student's work weighs against finding that he had any significant contribution to the words and phrases that expressed the ideas and as such we should treat him as a coauthor of the dissertation. Based on his comments, we modified the intent section to clarify our assessment; however, our conclusion of his level of intent is unchanged.

⁵² This action is similar to Group I actions 45 C.F.R. 689.3(a)(1).

⁵³ A Group III action 45 C.F.R. 689.3(a)(3)(ii).

⁵⁴ This action is similar to 45 C.F.R. 689.3(a)(1)(iii).

⁵⁵ A Group I action 45 C.F.R. 689.3(a)(1)(iii).

⁵⁶ Tab 12.

NATIONAL SCIENCE FOUNDATION
4201 WILSON BOULEVARD
ARLINGTON, VIRGINIA 22230



OFFICE OF THE
DEPUTY DIRECTOR

DEC 18 2013

CERTIFIED MAIL --RETURN RECEIPT REQUESTED

[REDACTED]

Re: Notice of Research Misconduct Determination

Dear [REDACTED]

You served as a Principal Investigator on four proposals submitted for funding to the National Science Foundation. 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 in aggregate 177 lines of copied text from 13 sources into four NSF proposals. 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, and our determination that it was committed knowingly. I have also considered the fact that your misconduct was not an isolated incident. In addition, I have considered 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 December 15, 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 December 15, 2015, you must obtain and provide to the OIG assurances from a responsible official of your employer that any proposals or report you submit to NSF as a PI or co-PI does not contain plagiarized, falsified, or fabricated material.
- By December 15, 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;
- Until December 15, 2015, you are prohibited from serving as a reviewer, advisor, or consultant for NSF; and

- By May 15, 2014, you must certify compliance / fulfillment of the requirements imposed by your University as a result of its investigation.

The certifications, assurances, and training documentation 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], Assistant General Counsel, at (703) 292-[REDACTED].

Sincerely,



Fae Korsmo
Senior Advisor

Enclosures:
Investigative Report
45 CFR Part 689