



CLOSEOUT MEMORANDUM

Case Number: A11060041

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OIG conducted an inquiry into an allegation of plagiarism in two NSF proposals (Proposal 1¹ and Proposal 2²). We concluded there was sufficient evidence to refer an investigation of the PI (Subject 1³) and Co-PI (Subject 2⁴) of the Proposals to the University.

The University concluded, based on a preponderance of the evidence, that Subjects 1 and 2 recklessly committed plagiarism, which the University deemed a departure from accepted practices. It required that their grant proposals be reviewed for five years; that they develop and instruct an ethics workshop for three years; that their Dean and Department chair be notified of the finding and be made responsible for monitoring their work; and that their 2012 annual review reflect the finding.

The University subsequently conducted an inquiry on the former post-doc (Subject 3)⁵ whom Subjects 1 and 2 had said was directly responsible for the plagiarism. Its inquiry determined an investigation was warranted; however, in lieu of the investigation, the University and Subject 3 signed a settlement agreement, precluding him from seeking University reemployment for seven years and requiring that he waive and release his rights and claims.

Our independent investigation concluded that Subjects 1 and 2 were not directly responsible for the plagiarism and that the actions taken against them by the University protect the federal interest. Our investigation further concluded, by a preponderance of the evidence, that Subject 3 knowingly committed plagiarism, which we deemed a significant departure from accepted practices of the relevant research community. We recommended actions to be taken to protect the federal interest. The Senior Advisor to the Director concurred with our recommendations.

This memo, the attached Report of Investigation, and the decision of the Senior Advisor to the Director constitute the case closeout. Accordingly, this case is closed.

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National Science Foundation

Office of Inspector General



Report of Investigation

Case Number A11060041

October 30, 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: OIG identified 10 sources from which approximately 80 lines, 3 figures, and 17 embedded references were copied into 2 NSF proposals. OIG referred investigation of the matter to the home institution of the PI (Subject 1) and co-PIs (Subjects 2 and 3) on the proposals.

University

Investigation: The University concluded, based on a preponderance of the evidence, that Subjects 1 and 2 recklessly committed plagiarism, deemed a departure from accepted practices.

The University required that the grant proposals of Subjects 1 and 2 be reviewed for 5 years; that they develop and instruct an ethics workshop for 3 years; that their Dean and Department chair be notified of the finding and be made responsible for monitoring their work; and that their 2012 annual review reflect the finding.

Based on the findings of its investigation involving Subjects 1 and 2, the University conducted an inquiry focusing on Subject 3, which determined there was sufficient evidence to substantiate Subject 3's direct involvement in the plagiarism and proceed to investigation. In lieu of further investigation, however, the University instead arrived at a settlement agreement with Subject 3, that precludes him from seeking University reemployment for 7 years and requires that he waive and release his rights and claims.

OIG

Assessment:

The actions taken by the University against Subjects 1 and 2 protected federal interests. The conduct of Subject 3 merits further action by NSF.

- **The Act:** Subject 3 plagiarized 88 lines, 3 figures, and 27 embedded references from 11 sources into two NSF proposals.
- **Intent:** Subject 3 acted knowingly.
- **Standard of Proof:** A preponderance of evidence supports the conclusion that Subject 3 committed plagiarism.
- **Significant Departure:** Subject 3's plagiarism represents a significant departure from accepted practices.
- **Pattern:** Three other NSF proposals Subject 3 drafted contained plagiarism.

OIG

Recommends:

- Make a finding of research misconduct against Subject 3.
- Send Subject 3 a letter of reprimand.
- Require certifications from Subject 3 for a period of 1 year.
- Require assurances from Subject 3 for a period of 1 year.

- Require certification of attending a comprehensive responsible conduct of research training class within one year.
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OIG's Inquiry

OIG conducted an inquiry into an allegation of plagiarism in an NSF proposal (Proposal 1¹). We reviewed Proposal 1 and found 47 lines, 16 embedded references, and two figures copied from six sources.² Our review of another NSF Proposal (Proposal 2³) found 33 lines, one embedded reference, and one figure copied from four sources.⁴ The following chart illustrates our findings:

Source	Proposal 1	Proposal 2
A	16 lines, 9 embedded references	
B	10 lines	
C	5 lines, 1 figure, 3 embedded references	
D	8 lines, 4 embedded references	
E	4 lines, 1 figure	
F	4 lines	
G		8 lines, 1 embedded reference
H		9 lines
I		8 lines
J		8 lines, 1 figure
Total	47 lines, 2 figures, 16 embedded references	33 lines, 1 figure, 1 embedded reference

We contacted the Proposals' PI (Subject 1⁵) and Co-PI (Subject 2⁶) regarding the allegations.⁷ In their joint responses,⁸ they acknowledged "that we didn't put appropriate references against some sentences where it deserves" adding that "since we did use most of those source documents in our list of references, it at least shows that we did acknowledge their important contribution in the field."⁹ They asserted that "our intention was never to hide appropriate references or copy directly and take credit for that write-up."¹⁰

Subjects 1 and 2 explained that:

During the course of proposal preparation, a lot of our focus stays on the proposed concept development, clearly defining the hypothesis and research objectives as well as summarizing our own preliminary data and technical approach sections. As a result, we depend sometimes on our students and associates for some of

¹ Tab 1: [REDACTED] (Subject 1). Co-PIs: [REDACTED] (Subject 3) and [REDACTED] (Subject 2). Institution: [REDACTED] (University). Declined.

² Tab 2: Sources A-F. Sources A, B, C, D, and F are journal articles; Source E is a website.

³ Tab 3: [REDACTED] PI: Subject 1. Co-PI: Subject 2. Institution: University. Awarded.

⁴ Tab 4: Sources G-J. Sources G, H, and J are journal articles; Source I is a website.

⁵ [REDACTED]

⁶ [REDACTED]

⁷ Tab 4. We did not contact Subject 3 because, unlike Subject 2, he was not a named Co-PI on Proposal 2.

⁸ Tab 5. Subjects 1 and 2 are spouses.

⁹ Tab 5, Response 2, pg 2. All quotations herein are *sic*, with emphasis as in original.

¹⁰ Tab 5, Response 2, pg 2.

the literature review part of the writing. Sometimes due to communications gap between our students and us, these kinds of errors happen, which are truly very unfortunate mistakes. For example, the write up in question for [Proposal 1] was originally sent to us by [Subject 3¹¹], a co-PI in this proposal.¹²

They said they “trusted [Subject 3] as a co-PI for his professional judgment for the literature review aspects of this proposal,” but said they are responsible for not “validating all the citations that he used.”¹³ Subjects 1 and 2 concluded that “We cannot avoid our responsibility for such mistakes. And we do apologize for that.”¹⁴

The Subjects provided a corroborating email from Subject 3, stating “I am feeling very terrible with this issue and it will haunt me for life. Especially, I lost your trust on me, which I do not think I can gain again. I never did such a terrible mistake in my entire life and I can never forgive myself for this.”¹⁵ The email also detailed additional instances of inadequate citation.¹⁶

The response did not dispel the allegation. First, Subjects 1 and 2 acknowledged their responsibility for the copied material. Second, the totality of identified plagiarism could not be attributed to Subject 3, who was not a Co-PI on Proposal 2.¹⁷ Last, Subjects 1 and 2 seemed to demonstrate a lack of understanding on appropriate citation when they said that insertion of a reference near verbatim copying would have been sufficient. We concluded there was sufficient evidence to proceed to an investigation related to Subjects 1 and 2.

University Investigation and Adjudication

Consistent with our policy, we referred the investigation to the University.¹⁸ The University convened a committee, which produced a report that it provided to our office. The report was subsequently remanded to the committee by the University due to procedural errors.

The University convened a new Committee, which produced a second report (Report) that it provided to our office with attachments.¹⁹ The Committee conducted interviews and reviewed 12 state and federal grant proposals Subjects 1 and 2 submitted.²⁰ The Report concluded, based on a preponderance of the evidence, that Subjects 1 and 2 were “reckless in [their] attribution practices during the time period covered by this investigation, either directly through [their] own attribution

¹¹ [REDACTED]

¹² Tab 5, Response 2, pg 3.

¹³ Tab 5, Response 3, pg 1.

¹⁴ Tab 5, Response 2, pg 3.

¹⁵ Tab 5, Response 3, pg 1.

¹⁶ Tab 5, Response 3, pg 3-4.

¹⁷ Subject 3 was not named on Proposal 2's cover page, but the proposal did contain his Biographical Sketch.

¹⁸ Tab 6.

¹⁹ Tab 7.

²⁰ Tab 7, Exhibits, Exhibit 22. Six of the 12 proposals were NSF proposals: Proposal 1, Proposal 2, [REDACTED] (Proposal 3), [REDACTED] (Proposal 4), [REDACTED] (Proposal 5), and [REDACTED] (Proposal 6). Proposals 1-6 named Subject 1 as PI and Proposals 1-5 named Subject 2 as a Co-PI.

omissions or through insufficient monitoring of graduate student and post-doctoral proposal contributions.”²¹ Specifically, it stated:

Because of the way in which the research laboratory of [Subject 1] and [Subject 2] utilized research assistants and postdoctoral researchers, it is impossible to show that the Respondents themselves plagiarized, i.e. that not all the plagiarism originated from postdoctoral researchers, students, and/or collaborators.²²

It found that Subjects 1 and 2 exhibited “insufficient review and correction”²³ during proposal preparation since:

Copying of material is usually identifiable to careful readers who are mentors of their junior associates and who are also experts in their fields. The Committee finds that the Respondents should have identified a pattern of plagiarism among their collaborating post-doctoral researchers or graduate students; and that they had the opportunity to address the problem.²⁴

It added that “The Respondents are . . . responsible for the content of their proposals, and there is a clear, persistent pattern of plagiarism in the materials analyzed.”²⁵ It deemed their actions a significant departure from accepted practices.²⁶

The Committee’s investigation included statements regarding Subject 3’s culpability. It found that Subject 3 “acknowledged that he did not provide proper citations in the 2 proposals identified by NSF” and “that the 3 other proposals for which he wrote first drafts may also contain similar problems.”²⁷ It also found that “When asked about whether one should use quotation marks when copying a sentence or paragraph, [Subject 3] did not have an answer” despite his statement that “he received ‘guidance’ about proper citation procedures, and that [Subjects 1 and 2] talked about this subject during group meetings.”²⁸ The Committee, however, noted that Subject 3 did not draft all of the proposals in question and could not therefore be responsible for the totality of acts.²⁹

The University’s Deciding Official³⁰ accepted the Committee’s report and imposed the following actions recommended by the Committee: Subjects 1 and 2’s grant proposals must be reviewed using plagiarism software for five years; they must develop and instruct an “Ethics of Scientific Publishing” workshop for three years; their Dean and Department Chair were notified of

²¹ Tab 7, Investigation Report, pg 11.

²² Tab 7, Investigation Report, pg 1.

²³ Tab 7, Investigation Report, pg 9.

²⁴ Tab 7, Investigation Report, pg 10.

²⁵ Tab 7, Investigation Report, pg 1.

²⁶ Tab 7, Investigation Report, pg 1.

²⁷ Tab 7, Investigation Report, pg 6. The three other proposals are Proposals 3 and 4, and a state proposal.

²⁸ Tab 7, Investigation Report, pg 6.

²⁹ Tab 7, Investigation Report, pg 1. Subject 1 was sole PI on Proposal 6; Subject 2 was sole PI on two NIH grants.

³⁰ [REDACTED]

the research misconduct finding and made responsible for monitoring their work; and their 2012 annual review reflected the research misconduct finding.³¹

Subjects 1 and 2 strongly disputed the Committee's conclusions in a response they provided both to the University and to our office.³²

University Inquiry and Adjudication of Subject 3

Based on the investigation, a University Official (Official)³³ conducted an inquiry into allegations of plagiarism against Subject 3. The Official produced a report (Inquiry Report) that was provided to our office with attachments.³⁴ She determined that [Subject 3] "appears to have committed research misconduct by plagiarizing in multiple grant proposals."³⁵ Specifically, she said:

From listening to the interview,³⁶ [Subject 3] freely admitted to putting together the draft of the proposal and that he copied passages into the proposal word for word directly out of references without citing the references. He claims this was done because he was in a hurry in putting the draft together. He claims that because of the time crunch in getting the proposal written and submitted to the funding agency, the passages were never cited or for that matter put in quotation marks. He claims that it was never his intention to leave the copied passages in the proposal without citing. He admits it was a mistake on his part and not intentional.³⁷

The Inquiry Report concluded there was sufficient evidence to substantiate the allegation and proceed to investigation, but that it would not do so pending the negotiation of a settlement agreement between the University and Subject 3.³⁸ The signed agreement precluded Subject 3 from seeking University reemployment for seven years and required he waive and release his rights and claims "based upon wrongful discharge, defamation, invasion of privacy, alleged discrimination of any kind, any requests for public records, and any other claims arising in tort or in contract."³⁹

OIG's Independent Review

OIG assessed the Report and Inquiry Report for accuracy and completeness. We found both to be accurate and complete and further found that the University followed reasonable procedures,

³¹ Tab 7, DO Decision.

³² Tab 8.

³³ [REDACTED]

³⁴ Tab 9.

³⁵ Tab 9, pg 1.

³⁶ The interview refers to the interview of Subject 3 conducted during the investigation.

³⁷ Tab 9, pg 2.

³⁸ Tab 9, Inquiry Report Cover Memo, pg 1.

³⁹ Tab 10.

and produced an acceptable evidentiary record. However, for reasons discussed below, our conclusions differ from those of the University. Accordingly, we adopted its findings in part, but could not accept the Report in its totality in lieu of conducting our own investigation.

OIG's Investigation

Our investigation initially sought to clarify the party or parties directly responsible for inclusion of the plagiarized material in Proposals 1 and 2. We concluded that Subject 3 was directly responsible for the plagiarism. First, Subject 3 acknowledged drafting and/or being significantly involved in Proposals 1 and 2. Second, and most crucially, a review of Subject 3's drafts of Proposals 1 and 2 confirmed that he introduced the copied text into the proposals.⁴⁰

We further concluded that Subject 3 was directly responsible for the plagiarism in Proposals 3, 4, and 5. He acknowledged drafting and/or being significantly involved in Proposals 3 and 4.⁴¹ Additionally, although Subject 3 said he was not involved in Proposal 5,⁴² our review confirmed Subject 1 and 2's assertion that Proposal 5 included identical material from a non-NSF proposal to which Subject 3 acknowledged he contributed.⁴³

To better assess whether Subject 1 and 2 exhibited a pattern of plagiarism, we reviewed two NSF proposals Subject 1⁴⁴ and Subject 2⁴⁵ each submitted as sole PI. We identified no substantive plagiarism. Similarly, we identified no plagiarism in three recent proposals they submitted.⁴⁶ Based on the totality of the evidence, we concluded that Subjects 1 and 2 were not directly responsible for the plagiarism, and that the protection of federal interests does not require action beyond that taken by the University.

Our investigation therefore focused on Subject 3, who although not currently employed in the U.S., could return to U.S. employment. We contacted Subject 3, invited his comments on the Inquiry Report, and asked him to respond to specific questions and provide his CV.⁴⁷ Subject 3 provided his CV and responded only that he had not taken a course on research ethics, had not been instructed about plagiarism, and had not taken a grant writing course.⁴⁸

We re-reviewed Proposals 1 and 2 relative to Subject's 3 admission of additional copied material.⁴⁹ We identified an additional eight lines and 10 embedded references from a journal

⁴⁰ Tab 11, Exhibits 6 and 7. Subjects 1 and 2 provided these documents in response to a request for comment on the subsequently remanded report.

⁴¹ Tab 7, Investigation Report, pg 6.

⁴² Tab 7, Investigation Report, pg 6-7.

⁴³ The non-NSF proposal was a state grant proposal (Tab 7, Investigation Report, pg 6). The Subject's assertions appear at Tab 8, Proposal Analysis Final, pgs 16 and 24.

⁴⁴ [REDACTED] and Proposal 6. The University reviewed Proposal 6 as part of its investigation.

⁴⁵ [REDACTED]

⁴⁶ [REDACTED] This finding is consistent with their statement that they used personal funds to purchase plagiarism detection software.

⁴⁷ Tab 12.

⁴⁸ Tab 13.

⁴⁹ Tab 5, Response 3, pg 3-4.

article in Proposal 1.⁵⁰ We concluded, by a preponderance of the evidence, that Subject 3 appropriated 88 lines, 3 figures, and 27 embedded references from 11 sources into Proposals 1 and 2 without giving appropriate credit. We concluded that his act met the federal definition of plagiarism. Additionally, based on Subject 3's statements, particularly his admission that he inserted the text without citation or reference because of time pressures, we concluded Subject 3 committed the plagiarism knowingly. The Subject was wholly educated outside the U.S. (other than his then-current University postdoc position),⁵¹ and claims he never received formal education about plagiarism.⁵² Despite these facts, it is clear from his admission that he had simply copied and pasted material into the proposals without adequate attribution and that the Subject understood the nature of, and prohibition against, plagiarism.

To determine whether Subject 3's acts were a significant departure from accepted practices of the relevant research community, we first examined the University's practices. Based on the Report and Inquiry Report, such acts are clearly contrary to the practices of the University that then employed Subject 3. We then examined guidelines of the journal publisher in whose journals Subject 3 frequently publishes,⁵³ and found extensive resources related to plagiarism.⁵⁴ Similarly, a professional society at whose conferences the Subject frequently presented has a policy and procedure for addressing plagiarism claims.⁵⁵ We concluded Subject 3's acts were a significant departure from accepted practices of his research communities.

Lastly, our review of Proposals 3, 4, and 5 found Proposal 3 contained roughly 38 copied lines, Proposal 4 contained roughly 20 copied lines, and Proposal 5 contained roughly 22 copied lines. We determined the Subject exhibited a pattern 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.⁵⁶

The Acts

The University concluded, and we agree, that Subject 3 plagiarized 88 lines, 3 figures, and 27 embedded references from 11 sources into two NSF proposals. We determined that Subject 3's actions constituted a significant departure from accepted practices.

⁵⁰ Tab 14.

⁵¹ Tab 13, pg 2.

⁵² Tab 13, pg 1.

⁵³ [REDACTED] whose journals include: [REDACTED]

⁵⁴ For example, [REDACTED]

⁵⁵ The [REDACTED]

⁵⁶ 45 C.F.R. §689.2(c).

Intent

We concluded that Subject 3 acted knowingly based on his own admission that he inserted text without citation or reference due to time pressures.

Standard of Proof

We concluded that Subject 3's actions and intent were proven based on a preponderance of the evidence.

We conclude by a preponderance of the evidence, that Subject 3 knowingly plagiarized, thereby committing an act of research misconduct.⁵⁷

OIG's Recommended Disposition

When deciding what appropriate action to take upon a finding of misconduct, NSF must 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.⁵⁸

Seriousness

Subject 3's actions are a violation of the standards of scholarship and the tenets of general research ethics. Copied text serves to misrepresent one's body of knowledge, presenting reviewers with an inaccurate representation of a proposal's respective merit. Additionally, his "time-saving" strategy of copying material without adequate attribution served to implicate Subjects 1 and 2 in the time-consuming investigation process.

Pattern

We concluded that three other NSF proposals contained copied material, constituting a pattern of plagiarism.

Recommendation

Based on the evidence, OIG recommends that NSF:

- Send the Subject a letter of reprimand notifying Subject 3 that NSF has made a finding of research misconduct.⁵⁹

⁵⁷ 45 C.F.R. part 689.

⁵⁸ 45 C.F.R. § 689.3(b).

⁵⁹ 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.⁶⁰ The instruction should be in an interactive format (e.g., an instructor-led course) and specifically include information regarding appropriate citation.
-

For a period of 1 year as of the date of NSF's finding:

- 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.⁶¹
 - 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.⁶²

The Subject's Response to Draft Investigation Report

We provided the Subject with a copy of our draft report and attachments for comment. The Subject chose not to respond to our report. He did however note that he could not currently locate a responsible conduct of research training program in India, but that he would continue looking for such a program.

⁶⁰ This action is similar to Group I actions 45 C.F.R. 689.3(a)(1).

⁶¹ This action is similar to 45 C.F.R. 689.3(a)(1)(iii).

⁶² A Group I action 45 C.F.R. 689.3(a)(1)(iii).

NATIONAL SCIENCE FOUNDATION
4201 WILSON BOULEVARD
ARLINGTON, VIRGINIA 22230



APP R 1 2014

OFFICE OF THE
DIRECTOR

CERTIFIED MAIL --RETURN RECEIPT REQUESTED

[REDACTED]

Re: Notice of Research Misconduct Determination

Dear Dr. [REDACTED]

You served as co- Principal Investigator on two proposals for funding to the National Science Foundation (NSF): [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 Proposed 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;
- (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 to NSF contained substantial copied material: 88 lines, 3 figures, and 27 embedded references copied from eleven sources. Your submission of proposals with substantial copied material constitutes plagiarism and meets 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, in particular the OIG’s analysis of your other proposal, NSF has determined that, based on a preponderance of the evidence, you acted knowingly and that your actions constituted a significant departure from accepted practices of the relevant research community. I am, consequently, 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 the fact it was not an isolated event. I have also considered other relevant circumstances. 45 CFR 689.3(b).

After assessing the relevant facts and circumstances of this case and NSF’s regulations, I am taking the following actions:

- Within one year of the date of this notice, you must complete a responsible conduct of research training program, for which the instruction should be an interactive format (e.g., an instructor-led course) and which specifically includes plagiarism. You must provide documentation of the program’s content and proof of its completion to the OIG;
- For a period of one year from the date of this notice, you are required to submit 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; and
- For a period of one year from the date of this notice, you are required to submit assurances to the OIG from a responsible official of your employer 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.

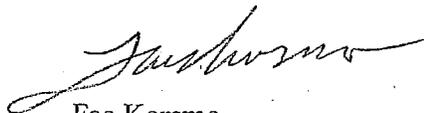
All certifications and assurances should be submitted in writing to NSF’s Office of Inspector General, Associate Inspector General for Investigations, 4201 Wilson Boulevard, Arlington, Virginia, 22230.

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, the decision on the finding of research misconduct will become final.

For your information, we are attaching a copy of the applicable regulations. Should you have any questions about the foregoing, please contact [REDACTED], Deputy General Counsel, at (703) 292-8060.

Sincerely,



Fae Korsmo
Senior Advisor to the Director

Enclosures:
Investigative Report
45 CFR Part 689