

## CLOSEOUT MEMORANDUM FOR M-97120048

On 11 December 1997, a program officer<sup>1</sup> brought an allegation of misconduct in science to our attention. The complainant<sup>2</sup> alleged that an NSF proposal, submitted by three PIs (subjects),<sup>3</sup> contained research projects that were already completed and that the subjects were seeking duplicate funding.<sup>4</sup> The complainant said the subjects submitted a manuscript<sup>5</sup> for publication prior to the submission of their proposal<sup>6</sup> that described results for the projects presented in the proposal. The proposal contained no acknowledgement or reference to the manuscript.

We determined that the results presented in the manuscript appeared to represent the completion of the research projects described in the proposal. Because of the very technical nature of the projects, however, we requested an NSF expert<sup>7</sup> to assist us in our comparison. The expert agreed with our determination.

We wrote to the subjects and requested their views. They contended that: there was a "clear and substantial" distinction between the results presented in the manuscript and the results expected from the proposed research plan; the "Results from Prior NSF Support" section in their proposal showed that they were already working on the research projects, so they did not think it necessary to list the manuscript in the proposal; and the manuscript had not been accepted for publication at the time of the proposal's submission.

We sought the same NSF expert to review the subjects' response. The expert said that the proposal was very poorly written. However, the expert explained that, with the aid of the subjects' response, the expert could now discern that the subjects did show that the proposal was new work that was a continuation of the manuscript's research projects. Because the proposal was a continuation of the research presented in the manuscript, the expert said the subjects should have acknowledged the submission of the manuscript in the proposal. We concluded that there was insufficient substance showing that the subjects intended to seek duplicate funding. We wrote to the subjects admonishing them for their failure to list the manuscript in the proposal. We explained that, in future proposals, they should be careful to clearly distinguish proposed work that is a continuation of prior research projects and to provide lists of appropriate publications and manuscripts as support.

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

1  
2  
3  
4  
5  
6  
7

**Footnotes Redacted**

**CLOSEOUT MEMORANDUM FOR M-97120048**

cc: Integrity, IG