

Investigations

CIVIL AND CRIMINAL INVESTIGATIONS

We investigate violations of federal civil and criminal statutes by applicants for and recipients of NSF funds, as well as NSF employees and contractors. When we find substantial evidence of wrongdoing, we refer cases to the Department of Justice for prosecution and recommend administrative action by NSF in appropriate circumstances.

Our investigations yielded significant results during this reporting period, including the president of a research company being debarred for ten years and being required to pay over \$105,000 in restitution after pleading guilty to submitting false claims, and the indictments of a former school superintendent and two professors for fraud involving NSF grants.

False Claims and False Statements by Company Officials Result in Felony Convictions and Ten-Year Debarments

Our investigation involving the president and the executive director of a Massachusetts research and evaluation company, which had received a number of NSF grants, resulted in the president pleading guilty to submitting false claims. He was required to pay over \$105,000 in restitution and was sentenced to a month in prison, nine months home detention, and two years of supervised release. The executive director pled guilty to submitting false statements, was required to pay over \$5,000 in restitution, and was sentenced to five years probation. Both executives and the company agreed to be debarred for ten years.

We had previously investigated the company and found that its accounting system failed to accurately track grant expenditures.² At that time, NSF followed our recommendation to put the company on a cost-reimbursement plan, requiring the executives to certify to the accuracy of information about incurred expenses provided to NSF each month. Thereafter, on a site visit, we discovered that the executives were instructing their employees to bill time to NSF projects regardless of how much time they spent on those projects. Subsequent investigation revealed that the president had also instructed a vendor to bill NSF for non-NSF charges, and then submitted such false charges to NSF for payment. In response to our recommendation, NSF terminated the company's grant, resulting in more than \$800,000 being available for other projects.

² September 2003 Semiannual Report, p.33.

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Former NSF Senior Executive Convicted of Submitting Fraudulent Financial Disclosure and Tax Return

A former NSF Senior Executive Service employee pled guilty to felony charges for making false statements on his NSF financial disclosure reports and for filing a false federal tax return. While he was a senior executive at NSF, this individual was also secretary general for a non-profit organization that promoted engineering. Although he did not receive a salary from the non-profit, he could be reimbursed for business expenses related to the non-profit.

Our joint investigation with the IRS found that this individual paid himself approximately \$388,500 from the nonprofit over five years and that he used more than \$100,000 of this money for personal purchases such as family vacations and gifts, fitness club memberships, a bidet, monthly parking near NSF, numerous restaurant meals and daily gourmet coffee during NSF work hours, home renovations, and a Combined Federal Campaign charitable contribution.

Further, he did not disclose the income on his annual financial disclosure reports to NSF, and he affirmatively misrepresented the income on those forms as reimbursements for business expenses. In addition, he knowingly failed to include the nonprofit payments as income on his tax returns over five years. He resigned from NSF during our investigation, and is scheduled to be sentenced in May 2011.

Former School Superintendent and Two Former University Professors Indicted for Fraud Related to NSF and Department of Education Grants

Three individuals were indicted in California for fraud related to NSF and Department of Education grants to support elementary school science and math education. The first indictment charged a former school superintendent and two former university professors with 16 counts of conspiring to enrich themselves by unlawfully diverting federal grant money to their own use, mail fraud, and theft from programs receiving federal funds.

The first indictment alleged that the former superintendent used his position to retain an evaluation company owned by one of the professors, and that he then approved \$395,000 in payments to the company from federal grant funds. The company then allegedly paid the superintendent \$90,000 and paid \$305,000 to the two professors. Further, the indictment alleged that the superintendent approved subawards from NSF and Department of Education grants to the professors' university, and the professors then paid him over \$100,000 from these sub-awards. There is no evidence that the superintendent did any work for these payments.

The second indictment charged the superintendent with 32 counts of mail and wire fraud for obtaining multiple duplicate travel reimbursements from the school district and federal grants, and with falsifying data regarding students' standardized test results. The superintendent had a subaward from a \$5.4 million NSF grant to a university to assess an innovative teaching methodology

he claimed to have created. He allegedly: falsified his research design and protocols; fabricated results for a non-existent “control group” of students; and falsified the data for the students who were taught with his methodology to make it appear to be more successful.

University Returns \$100,598 for Mischarges

Our review of a grant in which the grantee requested a no-cost extension that NSF denied, disclosed that \$100,598 was drawn down nine months after the expiration of the grant. A no-cost extension allows additional time beyond the established expiration date for an award for completion of the original work within the funds already made available.

The university determined that the post-expiration charges constituted salary for effort by the PI that was unrelated to the NSF project, and the university returned the funds to NSF. The university is also updating its procedures and strengthening its internal controls to prevent future such unallowable payments.

This is our third substantiated investigation involving improper expenditures following denied no-cost extensions. In one, the institution disregarded NSF’s express denial of a no-cost extension and expended remaining grant funds improperly, resulting in DOJ pursuing an action under the False Claims Act that settled for \$52,150, implementation of a compliance plan, and debarment of the PI.³ In the other case, the PI expended funds for costs unrelated to the NSF grant, resulting in the institution repaying \$19,736 to NSF.⁴

Company Wrongly Spends \$100,000 of ARRA Funds

A Connecticut company improperly accepted an NSF Small Business Technology Transfer grant while it was under a “Notice of Proposed Debarment” from another agency. While under this Notice, the company was ineligible to receive grants from any federal agency. The company then spent \$100,000 of the grant, which was funded under the American Recovery and Reinvestment Act (ARRA).

NSF agreed with our recommendation to terminate the grant, resulting in \$50,000 funds put to better use. We referred this matter to DOJ to seek to recover the funds the company had already spent. Because the company did not take any steps to repay the \$100,000, and because of our ongoing concerns with the company’s present responsibility, we recommended that NSF debar the company for three years. NSF agreed with our recommendation and issued a notice of proposed debarment. The company contested the proposed debarment, and NSF’s final decision is pending

³ March 2007 Semiannual Report, pp.29-30.

⁴ March 2010 Semiannual Report, p.10.

Former PI Suspended Government-wide Pending Resolution of Investigation

During the course of an ongoing investigation, we have uncovered evidence that a PI at a university improperly charged significant personal purchases to two NSF grants. He lied to his supervisor to justify the purchases as appropriate grant expenses. The university dismissed the PI, and he then formed a company and submitted grant proposals on behalf of that company to NSF and another federal agency. Based on our recommendation, NSF suspended the former PI government-wide in order to prevent him from obtaining and expending federal funds for the duration of this active criminal investigation.

NSF Program Official Accused of Undue Influence and Travel Fraud

An NSF program officer, who was working in a temporary part-time position under the Intergovernmental Personnel Act (IPA), took advantage of his position to influence funding of proposals to his laboratory at his home university in California. After an unsuccessful attempt to involve himself in the merit review process for a proposal submitted by his postdoctoral researcher, he facilitated funding of a second proposal by that postdoc. Following this incident, his division implemented special conflict-of-interests procedures for him.

It was also alleged that the IPA committed travel fraud. We coordinated our investigation with his university and found that he received duplicative reimbursements from his university (through a small business he owns), and two other companies for travel paid for by NSF. Further, he had not disclosed his financial interest in these companies to either NSF or his university.

Following our recommendation, NSF terminated his IPA grant. The university referred the IPA to its county district attorney for prosecution, and that case is pending.

Three Universities Return Funds to NSF for Unallowable Charges

In the first case, a visiting scientist was receiving a salary from an NSF grant to a university, while also receiving pay from his home institution. The visiting scientist had increased his work on the grant after the co-PI left the university and received additional salary payments from the grant, while the university was unaware that he was also receiving salary from his home institution. The university determined that its failure to follow its own procedures caused it to overcharge the NSF grant for unallowable salary, fringe benefits, and indirect costs totaling \$93,324. The university returned this money to NSF and implemented administrative changes to strengthen its internal controls to prevent such future unallowable salary payments.

In the second case, a university violated the terms of an NSF grant limiting scholarship payments to \$10,000 annually. The university acknowledged scholarship payments in excess of the \$10,000 limit, resulting in a \$54,250 overcharge to NSF. As a result of the investigation, the university returned the funds to NSF and took corrective action to ensure compliance with future NSF grants.

In the third case, a Guam university inaccurately charged salary expenses to an NSF grant. The university returned \$36,863 to NSF and took corrective action to ensure compliance with future NSF grants.

NSF Takes Action on Two High-Risk Individuals

We referred the results of two investigations of high-risk individuals to NSF for administrative action. In the first, a PI on two NSF grants inappropriately charged salary and other personal expenses to both university and NSF grants. As a result, the university fired the PI and replaced him as PI on the NSF grants. We recommended that NSF debar the former PI for one year; however, NSF entered into a one-year administrative agreement, requiring him to: (1) attend an ethics training course; (2) notify NSF's Office of General Counsel within five days of submission of any NSF proposals; (3) obtain a supervisor's signature on all expenses charged to an NSF grant; and (4) submit a written report at the end of the year certifying his compliance with the agreement.

In the second case, two senior personnel at a university had been prosecuted by local authorities for use of \$286,000 of university funds for personal purposes. One of the individuals was convicted and imprisoned. Because the second individual had received a deferred adjudication (including a substantial restitution obligation), and had become eligible for federal grants and contracts by joining the faculty at another university, we questioned her present responsibility for handling federal funds and recommended that NSF debar her for three years.

NSF entered into a three-year administrative agreement requiring her to: (1) take an ethics course annually the next two years; (2) make an annual report to NSF of training taken and proposals (if any) submitted; (3) abide by certain conditions, including making note of the existence of the administrative agreement in grant applications, obtaining university approval of any expenditure she makes as a PI, and agreeing that future grants will be administered on a reimbursable basis rather than through advance payments; and (4) not serve as an NSF reviewer for three years.

RESEARCH MISCONDUCT INVESTIGATIONS

Research misconduct damages the research enterprise, is a misuse of public funds, and undermines the trust of citizens in government-funded research. It is imperative to the integrity of research funded with taxpayer dollars that NSF funded researchers carry out their projects with the highest ethical standards. For these reasons, pursuing allegations of research misconduct by NSF-funded researchers continues to be a focus of our investigative work. In recent years, we have seen a significant rise in the number of substantive allegations of research misconduct associated with NSF proposals and grants. The NSF definition of research misconduct encompasses fabrication, falsification, and plagiarism.

During this reporting period, we referred nine cases to NSF which are summarized below. NSF's decisions are pending in seven of the nine cases.

Graduate Student Intentionally Falsifies Data and Results

A graduate student at a Vermont university conducting NSF-funded research intentionally falsified data and results, initially withholding the truth regarding her actions from her advisor, the PI. The student, who received NSF support as a graduate research assistant for three summers, admitted her misconduct only when confronted by the PI, who could not recreate her data. She had falsified data and research materials after she inadvertently destroyed her test material.

The university investigation concluded that the student intentionally falsified data, and dismissed her from the university. We recommended that NSF: make a finding of research misconduct against the student; send her a letter of reprimand; debar her for three years; and require certifications and assurances for three years following the debarment period. NSF's decision is pending.

Lab Technician Fabricates Data in Biomedical Study

A laboratory technician at an Illinois university fabricated data for a series of assay measurements. The technician purposefully altered the data he provided to his colleagues to support the desired conclusion. These data appeared in a publication as well as a proposal submitted to NSF. Based on the university's finding of research misconduct, as well as our additional investigation, we confirmed that the technician intentionally committed research misconduct.

We recommended that NSF: make a finding of research misconduct; send a letter of reprimand; debar the individual for three years; require certifications and assurances for three years after debarment ends; prohibit service as a reviewer of NSF proposals for six years; and require completion of a course in research ethics within one year of the finding of research misconduct. NSF agreed with our recommendations and proposed debarment of the individual. NSF's final actions are pending.

Seven Plagiarism Cases Are Referred to NSF for Adjudication

Plagiarism, defined as "the appropriation of another person's ideas, processes, results or words without giving appropriate credit,"⁵ is a direct assault upon NSF's expectation that proposals submitted to the agency will uphold scholarly standards. Plagiarism in a proposal serves to misrepresent the PI's body of knowledge and research experience, and therefore inaccurately portrays the proposal's respective merit to the reviewers and program officers. As such, it provides a flawed basis upon which to make a funding decision. Plagiarism debases the research community's faith in the validity of the research proposed and ultimately erodes the integrity of the research community.

⁵ 45 C.F.R. § 689.1(a)(3).

In each of the seven plagiarism cases discussed below, we recommended that NSF make a finding of research misconduct, issue a letter of reprimand, and require completion of a course on research ethics.⁶ We also made additional recommendations as described below—except as noted, NSF’s decision is pending in each case.

PIs Blame Students for Their Plagiarism

Our research misconduct investigations find that faculty members faced with a plagiarism allegation frequently blame their students. For example, in one case, a PI claimed that he had over 80 undergraduate students involved in drafting the proposal making it difficult to determine who was responsible for the plagiarism. In another case, a PI claimed that he had incorporated well-written text he received from his graduate student—the university investigation committee observed that the student had “weak English skills,” and concluded that, even if the PI’s story was true, he was still responsible for the plagiarism because it was “inexplicable that [the PI] did not review and/or edit what the student wrote.” In another case, a senior professor falsely accused an undergraduate student of copying text, from a proposal the scientist had received for confidential peer review, into the professor’s NSF proposal. Our investigation determined that, at the time the proposal was written, the student did not work with the professor, was not registered with the university, and had in fact returned to his native country.

All too often students become a convenient scapegoat for faculty members. We remind PIs and co-PIs that the individuals listed as investigators on the proposals and coauthors on the articles are ultimately responsible for the content, and they should thoroughly review any materials provided by students.

- A faculty member at an Indiana university copied text into two NSF proposals, using sources that included prior proposals from her faculty colleagues. The university concluded that the faculty member committed research misconduct, required training in the responsible conduct of research (RCR), and instituted a three-year period in which the faculty member’s external proposals must be reviewed before submission. We agreed with the university’s conclusions and recommended that NSF require three years of certifications and assurances, and prohibit service as an NSF reviewer.
- A university administrator knowingly copied several pages of text from an NSF-awarded proposal into his proposal for a nearly identical project. The administrator admitted to the copying and asserted that he had obtained the source document at a grant writing workshop. His co-PIs were unaware of the copying when they edited the text, resulting in only minor changes from the original text. The university found that the administrator committed plagiarism, concluded that it was just “poor judgment,” restricted his ability to apply for a promotion, removed him from his current position as a

⁶ If the university required completion of such a course, we recommended that NSF require submission of a certification that the course was in fact completed.

departmental administrator, and required his proposals to be reviewed by an internal committee for three years. We concluded that the administrator knowingly committed plagiarism, but his actions appeared to be an isolated incident, against which we balanced the significance of the administrator's position within the university and on active NSF grants. We recommended NSF debar him for one year, require certifications and assurances for three years following the debarment, and ban him from serving NSF as a reviewer, advisor, or consultant.

- A PI at an Alabama university plagiarized substantive amounts of text from six source documents into three NSF proposals. Concerning the proposal containing the largest amount of copied text, the PI contended that reference information was lost during the editing process. The university concluded that the PI recklessly committed plagiarism, a significant departure from accepted practices in the research community. Following the university's investigation, we noted that, contrary to the PI's claims, the draft proposal did not contain reference information. We concurred with the university's assessment and recommended that NSF require certifications and assurances for two years.
- A professor at a Mississippi university plagiarized text into three unfunded proposals submitted to NSF. During the university investigation, the PI claimed she was ignorant of the definition of research misconduct in the NSF regulation; however, the university concluded that she committed research misconduct, stating that "ignorance is no defense against a charge of plagiarism," and recommended that her employment be terminated. We agreed with the university's conclusions and recommended that NSF require certifications and assurances for two years.
- A professor from an Alabama university plagiarized text, a figure, and references into two proposals he submitted to NSF. He asserted that the copied material in one of the proposals was a former student's Ph.D. thesis and claimed the student had provided the material to the professor's research group. The former student denied the professor's claim.

The university concluded that the professor recklessly committed plagiarism, sent him a letter of reprimand, and required him to write letters apologizing to his former student and NSF program officers, attend an ethics training course and complete RCR certifications, design a research integrity and plagiarism workshop for university faculty and researchers, and resign from activity with university affiliated research for two years, among other things. We concurred with the university's findings and recommended that NSF require certifications and assurances for a year, and bar the professor from serving NSF as a reviewer for one year.

- An assistant professor at a Florida university plagiarized text, figures, and references into two proposals he submitted to NSF. During the inquiry, he said that because the proposals were "highly interdisciplinary," he had undergraduate and graduate students, and postdoctoral researchers, conduct the background literature search and summarize the results into a draft, which he included in the introductions to both proposals.

The university concluded that the PI committed plagiarism and took the following actions: sent the PI a letter of reprimand; required him to complete ethics training immediately and every three years while affiliated with the university; required him to ensure that his research team completes regular RCR training; informed him that future misconduct could result in termination or other sanctions; and committed to ensuring that all of the his proposals be reviewed, for at least three years, by his director and department chair prior to submission. We accepted the university's conclusions and recommended that NSF require certifications and assurances for one year. NSF concurred with our recommendations.

- A PI who was an assistant professor at a Texas university plagiarized text, a figure, and references into one proposal he submitted to NSF. The university's investigation concluded that the PI committed plagiarism, and the university required the PI to: complete a continuing education course in professional ethics before submitting future proposals or papers; sign affidavits for two years affirming that his proposal and peer-reviewed publication submissions contain no plagiarism; use plagiarism detection software to analyze two publications on which he was sole author and submit his analysis to them; and certify to administrators that there has been no knowing or intentional plagiarism in his publications. We adopted the report and its findings, and NSF concurred with our recommendations.

Actions by NSF Management on Previously Reported Research Misconduct Investigations

NSF has taken administrative action to address our recommendations on five research misconduct cases reported in our September 2010 report. In each case, NSF made a finding of research misconduct, issued a letter of reprimand, and required completion of a course in ethics training. NSF also took additional significant actions in response to our recommendations as summarized below.

- NSF debarred a graduate student for three years as a result of her data fabrication, required certifications and assurances for three years after debarment ends, and prohibited service as a reviewer of NSF proposals for six years.⁷
- NSF debarred a California university professor for one year for his plagiarism and violation of the confidentiality of peer review. NSF also required certifications and assurances for three years after debarment ends, and prohibited service as a reviewer of NSF proposals for three years.⁸
- NSF required a Mississippi university professor who plagiarized to provide certifications and assurances for one year.⁹
- NSF required a Virginia university professor who plagiarized to provide certifications and assurances for three years.¹⁰

⁷ September 2010 Semiannual Report, p.11.

⁸ September 2010 Semiannual Report, pp.11-12.

⁹ September 2010 Semiannual Report, p.13.

¹⁰ September 2010 Semiannual Report, p.12.

- NSF required a North Carolina university professor who plagiarized to provide certifications and assurances for three years and prohibited the professor from serving as a reviewer for three years.¹¹
- NSF required a California university professor who plagiarized to provide certifications and assurances for two years and prohibited the professor from servicing as a reviewer for three years.¹²

MANAGEMENT IMPLICATION REPORTS

Review of NSF Refreshment Purchases for Meetings

Our review of charges on NSF purchase cards for refreshments for merit review panelists and others attending meetings at NSF identified nearly \$500,000 in food-related payments in both 2008 and 2009.¹³ NSF pays for these refreshments out of program funds, in addition to the flat-rate or per diem compensation it provides to attendees to cover all of their expenses including meals. The flat rate compensation is \$480 for each meeting day and \$280 for each travel day to cover an honorarium, hotel, local travel, and all meals. The per diem rate includes \$71 for meals and incidentals, in addition to lodging and travel expenses.

We examined expenditures associated with the substantial flow of food and beverages daily into NSF from a wide variety of vendors to determine the potential for fraud, waste, and abuse. Approximately a quarter of the 110 purchases that we reviewed exhibited at least one typical fraud indicator, including late pre-approvals, inconsistent pre-approvals and invoices, late payment of invoices, hand-written changes to otherwise printed invoices, white-out on invoices, or late changes to already placed orders. In addition, we identified an NSF staff member who caused her father's company to receive the refreshment orders for three review panel meetings, violating NSF conflict of interests rules.

Pursuant to guidance from the General Services Administration (GSA), prices paid by agencies for refreshments must be fair and reasonable, and purchases must be equitably distributed among suppliers. We found that there is no Foundation-level oversight or coordination of refreshment purchases, no general definition of "reasonable" refreshment purchases, no uniform guidance to ensure consistent refreshment-purchase decision making within and across NSF divisions, and no purchase card training specific to refreshment purchases. As a result, refreshment purchase practices vary widely across the Foundation. While the majority of NSF organizations purchase food for panels and other activities from vendors in the area near NSF in Arlington, for example, nearly a quarter of such purchases were made from more distant vendors, which sometimes added additional delivery charges. Other situations our analysis revealed included: wide ranges in per-person prices paid for similar products; instances in which purchases were made of substantial food

¹¹ September 2010 Semiannual Report, p.12.

¹² September 2010 Semiannual Report, pp.12-13.

¹³ The Federal Travel Regulation states that federal agencies may provide light refreshments to agency employees attending an official conference. NSF's Office of General Counsel advises that meetings of review panels, advisory committees and Committees of Visitors fall within the definition of a conference.

that could be viewed as a meal and not light refreshments; cases where offices purchased virtually all refreshments from a single vendor; and some purchases that appeared to directly contravene GSA and NSF guidance.

Although we ultimately did not find fraud in the transactions we examined, the large number of indicators and divergent or inconsistent practices we identified strongly suggests that NSF would benefit from a more centralized purchasing process. We recommended that NSF assess whether it is a prudent use of federal funds to spend nearly a half-million dollars a year to provide extensive mid-morning and mid-afternoon refreshments for meeting attendees, in addition to the compensation they are receiving. If NSF chooses to continue providing food, we recommended that the agency centralize its provision of refreshments to improve control over the process and ensure it is carried out reasonably, consistently, and responsibly.

In response, NSF explained that it believes it is crucial that panels operate in an environment that maximizes thoughtful and efficient deliberation, and that light refreshment helps maintain such an environment. Accordingly, NSF decided to implement our second recommendation by taking the following specific steps:

- Set a reasonable cost ceiling per panelist per day;
- Reissue guidance (including keeping records, ensuring price reasonableness, and rotating vendors when practical, consistent with FAR requirements) to those responsible for ordering light refreshment to ensure menus are appropriate and light refreshment is not used to replace meals—and actively monitor compliance with the guidance;
- Explore the costs and benefits associated with further centralization of purchasing light refreshments, and establish fully centralized purchases if determined to be advantageous; and
- Generally continue to review agency supply and service requirements to determine strategies for cost savings through consolidations.

We will monitor NSF's execution of these practices.

Implementation of New Strategies and Practices for NSF OIG Hotline

The Department of Homeland Security OIG issued a report, adopted by the Council of the Inspectors General on Integrity and Efficiency, on recommended practices for OIG Hotlines.¹⁴ We implemented several of the report's recommendations. For example, we developed questions to help ensure that we obtain pertinent information from complainants to initiate a thorough investigation. We also implemented an email auto-reply for allegations received via our Hotline e-mail account¹⁵ as well as the Hotline Intake Form on our website,¹⁶ to inform complainants that our office has received their allegations.

¹⁴ www.ignet.gov/randp/ighotline1010.pdf.

¹⁵ oig@nsf.gov.

¹⁶ www.nsf.gov/oig/hotline_form.jsp.

Follow-Up from Previous MIRs

NSF Forms Task Group to Address Travel Expenditures by Temporary Program Staff

Our review of Independent Research/Development (IR/D) travel by temporary NSF program staff¹⁷ determined that the participants used IR/D funds for trips and conferences not referenced in the plans, took many more trips or longer trips than proposed, failed to provide detail on conference travel, used NSF funds for activities unrelated to the IR/D plan, and spent more on travel than proposed. In response to our review, NSF formed a task group to address the IR/D program and sent an agency-wide bulletin reminding staff to adhere to the current IR/D policies and procedures. We will monitor NSF's execution of these practices.

NSF Takes Steps to Address Recommendations in Response to Review of Oversight Plans for Projects Involving International Subawardees

We reviewed Oversight Plans for institutions collaborating with international subawardees in an NSF program.¹⁸ The Oversight Plans required the lead institution to ensure subawardee compliance with a variety of requirements including: financial accountability, biological oversight, Bioterrorism Act, and RCR. Our review of the program's proposals and recommended grants determined that the Plans generally did not substantively address all of the requirements and did not reflect collaboration between the lead institution and subawardee in creating the Plans. We recommended that NSF require the collaborative development of Oversight Plans, increase awareness concerning RCR training and research misconduct reporting, and develop more detailed guidance for Oversight Plans in future international cooperative grants.

NSF agreed with our recommendations and stated that it will: modify language in the solicitation to ensure collaborative Oversight Plans as the program matures; include language in the 2012 program solicitation providing additional guidance to applicants; require a signed agreement in post-panel negotiations; provide webcast workshops on institutional responsibilities; and, encourage grantees to develop Oversight Plans with subawardees and explain how they will address RCR training and research misconduct enforcement in annual reports. We will monitor NSF's execution of these practices.

¹⁷ September 2010 Semiannual Report, pp.14-15.

¹⁸ September 2010 Semiannual Report, p.14.