



NATIONAL SCIENCE FOUNDATION
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS

CLOSEOUT MEMORANDUM

Case Number: A13050062

Page 1 of 1

Closeout

We reviewed an allegation that text, formatting, and implementation ideas from an NSF Proposal¹ were copied from a previously awarded NSF Proposal.² We referred the investigation to the Subject's³ institution. Based on the Institution's Ethics Policy, an official found that the Subject violated the code of conduct and imposed sanctions.

Our investigation concluded that the Subject knowingly plagiarized and committed intellectual theft from an awarded proposal which we deemed a significant departure from accepted practices. We recommended actions to protect NSF interests, including a 1-year debarment. The NSF Chief Operating Officer (COO) imposed the actions, but the Subject appealed all of the dispositions. NSF's final determination was that the PI would not be debarred, but NSF upheld all other actions.

This memo, the attached Report of Investigation, the COO's Notice of Proposed Research Misconduct Debarment letter, and the final letter of determination after appeal constitute the case closeout.



National Science Foundation Office of Inspector General



Report of Investigation Case Number A13050062

March 26, 2014

**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 and Intellectual Theft in an NSF proposal.
- OIG Inquiry:** OIG identified an NSF Proposal with approximately 301 copied lines and 4 tables from another NSF Proposal, as well as structural similarities. During our inquiry, the Subject admitted using the awarded NSF Proposal as a source for her own proposal, claiming that she thought it was permitted.
- University Investigation and Action:** The University concluded that the Subject plagiarized and took the following actions: 1) a research ethics course approved by a College administrator; 2) a restriction on writing grant proposals until the ethics course is complete; 3) a restriction on writing grant proposals until the Subject has shown she understands the institution's ethic policy; 4) a restriction on writing grant proposals for 3 years without a co-PI "well versed in research ethics"; 5) an internal reviewer must review all of the Subject's outstanding grant proposals; and 6) a letter of reprimand will be placed in the Subject's personnel file.
- OIG's Assessment:**
- **The Act:** the Subject plagiarized 231 lines, 4 tables, and ideas from 1 NSF Proposal into her own.
 - **Intent:** the Subject acted knowingly.
 - **Significant Departure:** the Subject's actions are a significant departure from the accepted practices of the research community.
 - **Standard of Proof:** The preponderance of the evidence supports the conclusion regarding the act and intent, and therefore a finding of research misconduct.
- OIG Recommendation:**
- Send the Subject a letter of reprimand notifying her that NSF has made a finding of research misconduct.
 - Debar the subject for a period of one year.
 - Require the Subject to certify compliance with the requirements imposed by the University.
 - Require the Subject to certify completion of an RCR course.
 - Require the Subject to submit certifications for 3 years.
 - Require the Subject to submit assurances from her employer for 3 years.
 - Bar the Subject from participating as a reviewer, advisor, or consultant for NSF for a period of 3 years.

OIG's Inquiry

Our inquiry into plagiarism in an NSF Proposal¹ (the Proposal) identified 301 apparently copied lines from a previously awarded NSF Proposal² (the Source), along with 4 substantially similar tables, and 2 sections of text containing ideas similar to the source and which are presented in the same order. Doctoring text to fit the Subject's circumstances was also evident in several places.

Though the Proposal had a PI and two co-PIs, our Internet search indicated that one of the co-PIs³ (the Subject) likely spearheaded the project and authored the Proposal. We initially only sent an inquiry letter to the Subject who accepted full responsibility in her response to our inquiry letter.

The Subject stated that the Source Author (SA) had sent her a copy of the Source and she had not realized she could not use it for her own proposal, mistakenly believing the Source author had given her permission.⁴ She also mentioned that an outside evaluator⁵ wrote 2 pages of the proposal; she stated she had not realized he used the same text for both proposals⁶ (though she did know that he served as outside evaluator for both). The external evaluator wrote approximately 70 lines, reducing the amount of allegedly plagiarized text to 231 lines.

She also told us that she had notified her institution⁷ (the College) of our inquiry and that they had already completed an investigation and imposed sanctions. We contacted the institution and requested a copy of its completed report of investigation and decision letter.

The University's Investigation

Because the College did not have a policy for investigating research misconduct allegations, the College's Official⁸ stated she had utilized the institutional ethics policy⁹ to conduct the investigation and produce a report (Report).¹⁰

The Report detailed information that the College Official learned during the interviews of the Subject and a grant writer employed by the College¹¹. In the Subject's interview, she described details of her interactions with the SA. The Subject stated that the SA had agreed to help her and the Subject had gained the impression that NSF encourages such cooperation in this particular program. The Subject had also been under the impression that the SA was allowing the Subject to use the Source as a template, though she later admitted that the SA never gave her

¹ [redacted] entitled, "[redacted]"

(Status: Declined)

² [redacted] entitled, "[redacted]" (Status: Awarded)

³ [redacted]

⁴ Tab 4, p. 1.

⁵ [redacted]

⁶ Tab 4, p. 1.

⁷ [redacted]

⁸ [redacted]

⁹ See Tab 5.

¹⁰ Tab 6 Report on investigation of NSF allegation 2013.

¹¹ [redacted]

specific permission to do so. In addition, “[w]hen asked if she had received specific permission to use words and phrases from the [Source] grant she said she had not.”¹² The Subject stated that others had used her own grant material as templates before, indicating her belief that this is acceptable practice.¹³ At the same time, the report noted the Subject’s contrition,¹⁴ stating, “[The Subject] indicated that she felt terrible about the allegations; she wanted to do the right thing and rectify the situation with all involved.”¹⁵

In the grant writer’s interview, she stated that she had seen the Source at the beginning of the process, but had not later compared it to the Subject’s draft. The grant writer stated that, in her opinion, she believed that the Subject had permission to use the structure, but did not know if she had had permission to use anything else.¹⁶ The grant writer also confirmed that the outside evaluator wrote 2 pages of the grant.¹⁷

The report concludes that the Subject used the Source as a structural template for her grant. Further, “[i]t is also clear that some phrases were copied directly from the [Source] document.... Those sections of text directly from the [Source] document, even with express permission of the author, should have been cited.”¹⁸

The report stated that the Subject’s lack of citation “violated the College’s code of conduct and ethics”.¹⁹ The College imposed the following sanctions: 1) a research ethics course approved by a College administrator; 2) a restriction on writing grant proposals until the ethics course is complete; 3) a restriction on writing grant proposals until the Subject has shown she understands the institution’s ethic policy; 4) a restriction on writing grant proposals for 3 years without a co-PI “well versed in research ethics”²⁰; 5) an internal reviewer must review all of the Subject’s outstanding grant proposals; 6) a letter of reprimand will be placed in the Subject’s personnel file.

After receiving the report, our office confirmed that there had not been a committee, nor was there additional documentation, such as notes, recordings, etc. for the interviews.

While the College did not explicitly make a finding of RM (and lacks any policy to make such a finding), the actions taken are consistent with those taken by other institutions in making a finding where the actions are a significant departure from accepted practices and the level of intent rises above that of being merely careless.

OIG’s Investigation

Because the College had already completed its investigation and because it did not have a pre-existing policy in place to handle research misconduct allegations, our office conducted its own investigation. However, we do accept, as part of the evidentiary record, the report provided by the College.

¹²Tab 6 College Report of Investigation, p. 2. [p. 3 of PDF]

¹³Tab 6 College Report of Investigation, p. 2. [p. 3 of PDF]

¹⁴Tab 6 College Report of Investigation, p. 3. [p. 4 of PDF]

¹⁵Tab 6 College Report of Investigation, p. 2. [p. 3 of PDF]

¹⁶Tab 6 College Report of Investigation, p. 2-3. [p. 3-4 of PDF]

¹⁷Tab 6 College Report of Investigation, p. 3. [p. 4 of PDF]

¹⁸Tab 6 College Report of Investigation, p. 3. [p. 4 of PDF]

¹⁹Tab 6 College Report of Investigation, p. 3. [p. 4 of PDF]

²⁰Tab 6 College Report of Investigation, p. 4. [p. 5 of PDF]

We wrote to the Subject to request information and a copy of her CV. In her response, the Subject stated that she contacted the SA because she had been awarded a grant for a specific NSF program in which the Subject was interested.²¹ The Subject further explained in her response that she “contacted her to learn more about the proposal process. After our meeting, the [SA] sent me her proposal and told me that I could use the materials to write my own proposal.”²² The Subject reiterated that she had believed that she would be permitted to use the material for her own Proposal and that the evaluator’s two pages had been “written specifically for my proposal.”²³ She expressed contrition and stated that her previous understanding of plagiarism had been the event of “unauthorized”²⁴ use of another’s work but now she realizes that even with permission, “appropriate credit”²⁵ must still be given. “Because my colleague gave me permission to use her material, it was my honest belief that I had the authority to do so.”²⁶

However, we contacted the SA²⁷, who stated that she never gave the Subject permission to copy her proposal, whether use of text, ideas, or structure and format. She also stated that there are numerous approaches to this specific NSF program and therefore it appeared that the Subject had copied the specific ideas for how the SA would execute the award, as well as the focus for areas of need that the Subject was proposing to address. The SA stated that her intention had been to simply provide the Subject an example of how a successful proposal was written and how the overall organization looked. She stated that another recipient had similarly provided one to her, which she used to ensure that she had included all relevant details and justifications, as well as to get ideas for how a budget would work. She did emphasize, however, that the Subject “did not ask for a copy of the proposal”; instead the SA had volunteered to give it to her.

We looked at the website for the NSF program²⁸ and saw that there are multiple and varied project ideas for the program, even within the relatively limited scope. The Subject’s Proposal, however, proposed a substantially similar project to that described in the Source, using substantially similar language, format, focus, ideas for course creation, and references.

OIG’s Assessment

A finding of 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 the evidence.²⁹

²¹ [REDACTED]

²² Tab 8, Subject’s response to Investigative Letter, p.1.

²³ Tab 8, Subject’s response to Investigative Letter, p.1.

²⁴ Tab 8, Subject’s response to Investigative Letter, p.2.

²⁵ Tab 8, Subject’s response to Investigative Letter, p.2.

²⁶ Tab 8, Subject’s response to Investigative Letter, p.2.

²⁷ [REDACTED]

²⁸ [REDACTED]

²⁹ 45 C.F.R. 689.2(c).

The Act

The Subject admitted her responsibility for the 231 lines of text copied from the Source into her NSF proposal. The Subject's unattributed copying is consistent with NSF's definition of plagiarism.³⁰ In addition, the Subject copied the details of the Source's proposed program and how to address areas of need and even the idea for a new type of course offering. We find that the Subject also therefore committed intellectual theft.

Intent

We conclude that the Subject's level of intent was not intentional, noting that she did not request a copy of the Source from the PI in order to plagiarize from an awarded proposal. We conclude, therefore, that the Subject knowingly copied text and ideas from another proposal.

Standard of Proof

The preponderance of the evidence supports that the Subject knowingly plagiarized and committed intellectual theft and that her actions were a significant departure from the accepted practices of the relevant research community.

We therefore conclude that the Subject's actions constitute research misconduct.

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.³¹

Seriousness

The Subject copied not only a very large amount of text from the Source into her own Proposal, but also took from it the structure and ideas for the details of execution. We also consider it very serious that the Subject copied ideas from an NSF Proposal that was awarded. In addition, because the Subject accepted a copy of the Source and subsequently used it as though it were her own, she violated the trust of a colleague, who had been merely following NSF's recommendation to cooperate with other researchers interested in this particular program. We did take into consideration that the Subject accepted responsibility and expressed contrition.

³⁰ 45 C.F.R. 689.1(a)(3)

³¹ 45 C.F.R. 689.3(b).

Pattern and Impact on the Research Record

The Proposal was the Subject's sole submission to NSF and was not funded. In addition, the Subject does not have single-authored printed publications, indicating an unlikelihood of a pattern of plagiarism in material submitted elsewhere. Therefore, we conclude that the Subject's act has no effect on the published research record.

Recommendations

Based on the evidence, OIG recommends that NSF:

- Send the Subject a letter of reprimand notifying her that NSF has made a finding of research misconduct.³²
- Debar the Subject for a period of one year.³³
- Require the Subject to certify her compliance with the requirements imposed by the College as a result of its investigation.
- Require the Subject to certify to the Assistant Inspector General for Investigations (AIGI) her completion of a responsible conduct of research training program and provide documentation of the program's content within 1 year of NSF's finding.³⁴ The instruction should be in an interactive format (*e.g.*, an instructor-led course) and specifically include instruction on plagiarism.

For a period of 3 years as of the date of NSF's finding:

- Bar the Subject from participating as a peer reviewer, advisor, or consultant for NSF.³⁵
- Require for each document (proposal, report, etc.) to which the Subject contributes for submission to NSF (directly or through her institution),
 - The Subject to submit a contemporaneous certification to the AIGI that the document does not contain plagiarism, falsification, or fabrication.³⁶
 - The Subject to submit contemporaneous assurances from a responsible official of her employer to the AIGI that the document does not contain plagiarism, falsification, or fabrication.³⁷

The Subject's Response to OIG's Draft Investigation Report

In the Subject's reply to our draft report,³⁸ she reiterated that it was not her intention "to use the Source Author's materials without her permission."³⁹ She stated that, even if the SA did not give her permission, the Subject had operated under the impression that she had permission. In particular, the Subject stated that the SA "suggested that I use certain

³² A Group I action 45 C.F.R. 689.3(a)(1)(i).

³³ A Group III action 45 C.F.R. 689.3(a)(3)(iii).

³⁴ This action is similar to Group I actions 45 C.F.R. 689.3(a)(1).

³⁵ A Group III action 45 C.F.R. 689.3(a)(3)(ii).

³⁶ This action is similar to 45 C.F.R. 689.3(a)(1)(iii).

³⁷ A Group I action 45 C.F.R. 689.3(a)(1)(iii).

³⁸ Tab 9, Subject Response to Draft ROI.

³⁹ Tab 9, Subject Response to Draft ROI, p. 1.

components of her proposal, specifically sections related to data management systems and the...seminar, because they were well-liked by NSF reviewers."⁴⁰ However, when we contacted the SA, she specifically expressed great concern regarding the Subject copying her data management plan and the course idea. After we spoke with her, the SA sent us copies of emails exchanged between her and the Subject. Two emails⁴¹ mention the data management plan and the course idea and do not suggest the Subject use them in her own proposal.⁴²

The Subject also reiterated her contrition and stated that she is complying with her institution's sanctions. We agree with the Subject that her level of intent does not appear to be that of "intentional" and our recommendations remain unchanged.

⁴⁰ Tab 9, Subject Response to Draft ROI, p. 1.

⁴¹ The others discuss budget questions and suggest a grant writer.

⁴² Tab 10, Emails to Subject; see highlighting.

NATIONAL SCIENCE FOUNDATION
4201 WILSON BOULEVARD
ARLINGTON, VIRGINIA 22230



SEP 06 2014

CERTIFIED MAIL -RETURN RECEIPT REQUESTED



Re: Notice of Proposed Research Misconduct and Proposed Debarment Determinations

Dear [REDACTED]

As the Director of the [REDACTED] [REDACTED] [REDACTED] ("College"), you served as a Co-Principal Investigator ("PI") and primary author on a National Science Foundation ("NSF") proposal that contained a significant amount of plagiarized material: 231 copied lines, four tables, and ideas. The plagiarized material came from a funded NSF proposal that a colleague had shared with you. This plagiarism is documented in the attached Investigative Report prepared by NSF's Office of Inspector General ("OIG").

Research Misconduct

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)

The OIG Investigative Report describes in detail the significant amount of plagiarized material, including copied ideas, contained in the proposal that you submitted to NSF. The College concluded as part of its own ethics investigation that your conduct in this case violated the College's code of conduct and ethics. The College did not make a finding of research misconduct because it did not have the procedural mechanisms in place to do so. You have accepted responsibility for the plagiarized material, and I note that you have also expressed contrition for your actions. This information permits me to conclude that your actions meet the applicable definition of plagiarism, as set forth in NSF's regulations.

Pursuant to NSF's regulations, the Foundation must also determine whether to make a *finding* of research misconduct based on a preponderance of the evidence. 45 CFR § 689.2(c). Based on information in both the OIG Investigative Report and the College ethics investigation, it is clear that you were not granted permission by the author of the source document to copy material. In addition, your acknowledgement that your proposal contained copied material permits me to conclude that, based on a preponderance of the evidence, the 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 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, which includes the fact that the source document for this plagiarism was an NSF proposal and the plagiarism included the intellectual theft of ideas; my determination that it was committed knowingly; the fact that the misconduct had no impact on the research record because your proposal was not funded by NSF; and the fact that there was no pattern of conduct. I have also considered other relevant circumstances. *See* 45 CFR § 689.3(b).

Based on the foregoing, I am imposing the following actions on you:

- You are required to complete a comprehensive responsible conduct of research training course within one year from the date that the research misconduct determination becomes final, and provide documentation of the program's content. The instruction should be in an interactive format (e.g., an instructor-led course, workshop, etc.) and should include a discussion of plagiarism.
- You are required to certify compliance with the requirements imposed by the College as a result of its ethics investigation.

- For a period of three years from the date that the research misconduct determination becomes final, I am requiring that you submit contemporaneous certifications that any proposals or reports you submit to NSF do not contain plagiarized, falsified, or fabricated material.
- For a period of three years from the date that the research misconduct determination becomes final, you are required to submit contemporaneous assurances by a responsible official of your employer that any proposals or reports you submit to NSF do not contain plagiarized, falsified, or fabricated material.
- For a period of three years from the date that the research misconduct determination becomes final, you are prohibited from participating as a peer reviewer, advisor, or consultant for NSF.

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

Debarment

Regulatory Basis for Debarment

Pursuant to 2 CFR § 180.800, debarment may be imposed for:

- (b) Violation of the terms of a public agreement or transaction so serious as to affect the integrity of the agency program, such as --
 - (1) A willful failure to perform in accordance with the terms of one or more public agreements or transactions;
 - ...
 - (3) A willful violation of a statutory or regulatory provision or requirement applicable to a public agreement or transaction; or
- (d) Any other cause of so serious or compelling a nature that it affects your present responsibility.

In any debarment action, the government must establish the cause for debarment by a preponderance of the evidence. 2 CFR § 180.850. In this case, the OIG Investigative Report and the College investigation support a finding that you intentionally committed plagiarism by taking 231 lines, four tables, and ideas from a successful NSF proposal. Thus, your action supports a cause for debarment under 2 CFR §§ 180.800 (d).

Length of Debarment

Debarment must be for a period commensurate with the seriousness of the causes upon which an individual's debarment is based. 2 CFR § 180.865. Having considered the seriousness of your actions, as well as the relevant aggravating and mitigating factors set forth in 2 CFR § 180.860, we are proposing your debarment for one year.

Appeal Procedures for finding of Research Misconduct and Procedures Governing Proposed Debarment

Appeal Procedures for Finding of Research Misconduct

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.

Procedures Governing Proposed Debarment

The provisions of 2 CFR Sections 180.800 through 180.885 govern debarment procedures and decision-making. Under our regulations, you have 30 days after receipt of this notice to submit, in person or in writing, or through a representative, information and argument in opposition to this debarment. 2 CFR § 180.820. Comment submitted within the 30-day period will receive full consideration and may lead to a revision of the recommended disposition. If NSF does not receive a response to this notice within the 30-day period, this debarment will become final.

Any response should be addressed to Lawrence Rudolph, General Counsel, National Science Foundation, Office of the General Counsel, 4201 Wilson Boulevard, Room 1265, Arlington, Virginia 22230. For your information, I am attaching a copy of the Foundation's regulations on non-procurement debarment and FAR Subpart 9.4.

Should you have any questions about the foregoing, please contact [REDACTED] Assistant General Counsel, at (703) 292-[REDACTED]

Sincerely,



Richard O. Buckius
Acting Chief Operating Officer

Enclosures:
Investigative Report
Nonprocurement Debarment Regulations
FAR Regulations
45 CFR Part 689

NATIONAL SCIENCE FOUNDATION
4201 WILSON BOULEVARD
ARLINGTON, VIRGINIA 22230



OFFICE OF THE
DIRECTOR

JUN 05 2015

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

[REDACTED]

Re: Final Determination of Research Misconduct

Dear [REDACTED]

By letter dated September 4, 2014, the National Science Foundation (NSF) determined that you committed research misconduct by including plagiarized material in an NSF proposal and proposed to debar you for a period of one year. We are in receipt of your timely appeal of the research misconduct determination and your information and arguments in opposition to the proposed debarment, dated October 2, 2014.

NSF considered carefully the materials you presented in your October 2, 2014 letter. While we acknowledge that the NSF Office of Inspector General (OIG) did not find your plagiarism to be "intentional," the OIG did find it to be "knowing" which is a requisite state of mind for a finding of plagiarism. As such, and considering that you have acknowledged that you did copy the material and that you should have attributed the material, the requisite elements of research misconduct under 45 CFR Part 689 are present. We therefore deny your appeal and uphold our September 4, 2014 research misconduct determination against you.

With regard to our proposal to debar you, we are persuaded that there are sufficient mitigating factors present to find a debarment action inappropriate at this time. Specifically, we took into account that there was no actual harm or impact on the research record and you had no pattern or prior history of wrongdoing. 45 CFR 689.3 and 2 CFR 180.860. NSF further took into account that your misconduct was found to be of a lesser state of mind than intentional, as above.

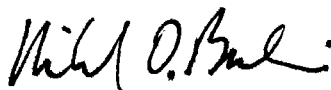
While no debarment will be imposed, NSF will maintain the non-debarment actions previously imposed upon you in our September 4, 2014 letter, namely:

- You must complete a comprehensive responsible conduct of research training course within one year from the date of this letter, and provide documentation of the program's content. The instruction should be in an interactive format (e.g., an instructor-led course, workshop, etc.) and should include a discussion of plagiarism.
- You must certify compliance with the requirements imposed by North Central College as a result of its ethics investigation.
- For a period of three years from the date of this letter, you are required to submit contemporaneous certifications that any proposals or reports you submit to NSF do not contain plagiarized, falsified, or fabricated material.
- For a period of three years from the date of this letter, you are required to submit contemporaneous assurances by a responsible official of your employer that any proposals or reports you submit to NSF do not contain plagiarized, falsified, or fabricated material.
- For a period of three years from the date of this letter, you are prohibited from participating as a peer reviewer, advisor, or consultant for NSF.

All certifications and assurances should be submitted in writing to the following e-mail address: certificationreporting@nsf.gov.

Should you have any questions about the foregoing, please contact Peggy Hoyle, Deputy General Counsel, at (703) 292-8060.

Sincerely,



Richard O. Buckius
Chief Operating Officer