



NATIONAL SCIENCE FOUNDATION
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS

CLOSEOUT MEMORANDUM

Case Number: A03060034

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We were informed of an allegation of plagiarism.¹ Allegedly a proposal² contained text copied from a patent.³ Through correspondence with the informant we learned that the proposal contained text that appeared to be copied from the patent and a paper.⁴

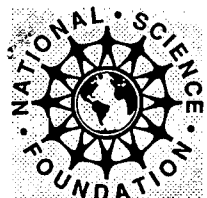
After reviewing the patent and paper, we found that approximately 50% of the introduction appeared to have been copied from the patent and paper. In response to our inquiry, we learned that subject 1⁵ had his new postdoc (subject 2) draft the proposal text and over a short period of time he revised the draft into a proposal. During his editing, subject 1 deleted subject 2's cross-references to the source documents. Although the two subjects variously attributed the copying to haste, cultural differences, and inexperience, they were both trained at US institutions. We referred this matter under 45 C.F.R. § 689 to the institution⁶ for investigation.

The university investigation committee concluded that neither subject committed research misconduct, rather their actions were best described a questionable research practices. After reviewing its report, we had a number of questions about its decisions with regard to subject 1 and communicated those concerns to the interim University Intellectual Integrity Officer.⁷ Specifically, we were concerned about subject 1's failure to accept personal responsibility for the plagiarism, his failure to meet NSF expectations for high scholarship articulated in the *Grant Proposal Guide*,⁸ and his failure to acknowledge the postdoc as an author.

In addition, we were concerned about the factual basis for the Authorized Organizational Representative's FastLane certification about the accuracy and completeness of the proposal contents. In the absence of certification from the original authors about its contents, it would appear there would be no basis for the AOR's FastLane certification.

1 [REDACTED]
2 [REDACTED]
3 [REDACTED] of the [REDACTED] Department at [REDACTED] University submitted the proposal.
4 [REDACTED] entitled, [REDACTED] The
5 patent identified [REDACTED]
6 [REDACTED] as inventors.
7 [REDACTED]
8 Dr. [REDACTED]
9 [REDACTED] University
10 Dr. [REDACTED]

⁸ NSF Grant Proposal Guide, (NSF 04-23); I.D3 page 13.



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Finally, we expressed concern that the institution's research misconduct policy did not articulate a level of intent required for a finding of research misconduct.

In response to our questions the investigation committee clarified that it felt that the mechanism by which this proposal was developed meant that the plagiarism it contained did not meet the MSU hurdle for a finding of research misconduct. The university took steps to reinforce scholarship standards with subject 1 by developing a remedial training program for subject 1. The institution provided us with a copy of the training certificate and acknowledged that subject 1's failure to credit the postdoc with authorship was inappropriate. In addition the institution committed to put further resources into training new faculty about responsible conduct of research.

The university provided documentation showing that the subject signed a statement certifying that the statements in the proposal were true, complete and accurate and that he was aware that false or fraudulent statements could be subject to criminal, civil, or administrative penalties. We noted that this certification appears in the institution's financial conflicts of interest form not the form transmitting the proposal. We have urged the institution to place this certification on the transmittal form.

We concluded that the issues raised in this case had been adequately addressed. This case is closed.