



NATIONAL SCIENCE FOUNDATION
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS

CLOSEOUT MEMORANDUM

Case Number: M99040021

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In April 1999, our office received an allegation from a complainant¹ who alleged that there were several problems with a proposal² submitted to the agency for funding of work at a university-sponsored research center³. The complainant alleges the following:

- The proposal contains extensive text that was plagiarized
- The CV's of listed collaborators⁴ appeared as though they had been fabricated
- Claims of ongoing research, in the proposal, were false and were not the work of the PI⁵ (subject 1) or co-PI⁶ (subject 2)
- A figure in the proposal was not representative of the research facility⁷ where some of the research was supposed to be performed and was taken from a document produced by the Environmental Protection Agency without proper reference

We initiated our inquiry into the allegations. We determined that there was sufficient evidence to warrant further investigation. We also learned that the university had been informed of the charges and was in the process of conducting an inquiry. We, therefore, deferred any further actions until the university completed its inquiry. The university completed its report and forwarded it to our office.

We reviewed the university's report and found that it did not effectively address several of the allegations brought to our office. We wrote back to the university and requested they address several questions that we believed were crucial to assessing this case. The university reconvened its inquiry committee to address our questions, completed a second report and forwarded it to our office.

We reviewed the university's reports, along with written materials provided to us by the subjects

¹ [REDACTED]

² NSF Proposal [REDACTED]

³ The [REDACTED]

⁴ Drs [REDACTED]

⁵ Dr [REDACTED]

⁶ Dr [REDACTED]

⁷ The [REDACTED]

	Agent	Attorney	Supervisor	AIGI
Sign / date				



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another person. However, we found the same text within a research proposal submitted to the Army Research Office (ARO) in 1991. Subject 1 was the PI on that proposal. We determined that much of the text from this 1991 proposal was strikingly similar to the text of the proposal central to the allegations. This included the section about ongoing research at the center, which clearly had not been updated from the content in the 1991 proposal.

Concerning the fabricated CVs of research collaborators, we determined that subject 1 had constructed the CVs from information off a public website. The subjects had met with both collaborators several months earlier to discuss a general desire to perform collaborative research. However, at the time the proposal was finalized, the collaborators were not available to review the proposal. Subject 1 then constructed the CVs believing that the collaborators had expressed a desire to participate in the proposed research. Neither the collaborators nor their university reviewed the final proposal. However, the collaborators did state later that they did not believe their professional reputations had been violated by the subjects.

Finally, we determined that the figure describing the research facility bore a striking resemblance to a figure from an EPA document. Subject 1 did provide evidence that the same figure was located within a paper submitted to her during an undergraduate class project. Subject 1 claimed this was the source of the figure and that she was unaware of the existence of the EPA document.

The university's inquiry committee determined that the subjects' actions were the result of "carelessness" and "not attending sufficiently to details". They did not believe the evidence supported a charge of misconduct in science. However, they did recommend that the provost caution the subjects, in writing, to "carefully draft, review and accurately and precisely describe necessary elements" in future proposals. The university Provost chose to take more stringent actions by placing a letter of reprimand into the subjects' personnel files because he said their actions "at a minimum" were "careless and unprofessional". He also determined that the subjects should be prevented from submitting research proposals to outside agencies for a period of one year.

NSF does require all principal investigators to maintain the highest ethical standards when developing and submitting a proposal to NSF. We agree that the subjects, particularly subject 1, did not employ the highest levels of scholarly standards in composing this proposal. However, because subject 1 was a PI on the 1991 ARO proposal, which she used as the source document, we believe that she has scholarly rights to the text in question and therefore her use of the text is not plagiarism. In copying the ongoing research section of the 1999 proposal straight out of the



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1991 ARO proposal, the subjects displayed extreme carelessness and disregard for submitting accurate information to NSF. Regarding the figure which misrepresents the research facility, it is difficult to state with absolute certainty that subject 1 was unaware of the EPA document which contained this figure. Again, we believe subject 1 showed, at a minimum, carelessness by including this figure in the proposal as representing a schematic of the facility without stating that the purpose of the figure was to provide only a basic understanding of how the facility worked and that it was not a schematic of the actual facility. Finally, it is our belief that the unauthorized use of CVs is not an accepted practice within the scientific community. However, we believe the subjects' actions were mitigated by the collaborators stating they did not feel that the subjects' actions violated their professional reputations.

In our view, the subjects' actions in this case, although inappropriate and extremely careless, do not individually or collectively rise to the level of misconduct in science. Therefore, we will not recommend additional actions be taken by NSF management in this case. We believe our decision is consistent with the findings of the university committee and with the actions taken by the university.

Accordingly, this case is closed.