



**DEPARTMENT OF HEALTH & HUMAN SERVICES**

Public Health Service

National Institutes of Health  
Bethesda, Maryland 20892

Date: October 20, 2022

From: Michael S Lauer, MD  
NIH Deputy Director for Extramural Research

To: Gloria Waters, PhD  
Vice President and Associate Provost for Research  
Boston University  
[gwaters@bu.edu](mailto:gwaters@bu.edu)

Re: Preprint with Dr. Mohsan Saeed as corresponding author  
NIH grants R01AI159945, R37AI087846, S10OD026983, S10OD030269, UL1TR001430

Dear Dr. Waters

I am writing to you in your capacity as Vice President and Associate Provost for Research at Boston University.

It has been brought to our attention that on October 14, 2022, Dr. Mohsan Saeed of the Department of Biochemistry and of the National Emerging Infectious Disease Laboratories of Boston University [posted a preprint](#) entitled "Role of spike in the pathogenic and antigenic behavior of SARS-CoV-2 BA.1 Omicron." In the preprint it is stated, "This work was supported by Boston University startup funds (to MS and FD), National Institutes of Health, NIAID grants R01 AI159945 (to SB and MS) and R37 AI087846 (to MUG), NIH SIG grants S10-OD026983 and SS10-OD030269 (to NAC) ... We thank the Clinical & Translational Science Institute (CTSI; 1UL1TR001430) ... "

As articulated in the [NIH Grants Policy Statement 8.2.1](#), "All HHS recipients must acknowledge Federal funding when issuing statements, press releases, requests for proposals, bid invitations, and other documents describing projects or programs funded in whole or in part with Federal money. Each publication ... must include ... an acknowledgement of NIH grant support ..."

[NIH guidance](#) states that "Recipients should only acknowledge NIH awards on publications and other statements when the activities that contributed to that publication directly arise from the award and are within the [scope of the award](#) being acknowledged. When considering whether acknowledgement is necessary, ask yourself: Did the personnel activity supported by the award contribute to the publication? Did the award support the conduct of experiments or the analysis of data that contributed to the publication? Is there a clear and apparent link between the work described in the publication with the aims and objectives of the grant? If the answer is yes to any of these questions, cite the appropriate NIH support." NIH defines the [scope of the award](#) ([NIH GPS 1.2](#)) as "The aims, objectives, and purposes of a grant; as well as the methodology, approach, analyses or other activities; and the tools, technologies, and timeframes needed to meet the grant's objectives. This includes the research or

training plan included with the original grant application, along with any approved modifications.” NIH has [engaged in outreach](#) with the extramural community regarding proper citation of grants in publications.

Additionally, NIH requires recipients to adhere to the requirements of the [Steven's Amendment Public Law 101-166](#), Section 511, which states that HHS recipients must acknowledge Federal funding when issuing statements, press releases, requests for proposals, bid invitations, and other documents describing projects or programs funded in whole or in part with Federal money. Recipients are required to state (1) the percentage and dollar amounts of the total program or project costs financed with Federal money and (2) the dollar amount of the total costs financed by nongovernmental sources, only for NIH programs that require cost-sharing. ([NIH GPS 4.2.1](#))

With this background in mind, we request that you please clarify why Dr. Saeed cited the 5 NIH grants in the preprint and what relationship those grants have to the experiment(s) described there. Using your professional judgement, please explain whether the grants should have been cited and explain your reasoning. If, in your judgement, some of or all the grants should not have been cited, explain your reasoning and how Boston University plans to remedy the error.

Please send me a written response by no later than close of business, Tuesday, October 25, 2022.

Sincerely,

Michael S Lauer, MD  
NIH Deputy Director for Extramural Research