

Closeout Memorandum for A-01110039

We were informed of a PI's¹ concerns about the processing, declination, and reconsideration of his proposal.² Specifically, the PI was concerned about:

1. Potential conflict of interests in the review of his proposal,
2. The quality of reviewers' comments,
3. The comments in the panel summary,
4. The responsiveness of the program officer to his phone calls, and
5. The adequacy of the reconsideration his proposal received.

OIG reviewed the proposal and reconsideration jacket and associated materials and interviewed selected program staff. With regard to each of the PI's concerns, OIG learned:

The PI was concerned that a competitor,³ who is currently a program officer in the division that considered the PI's proposal, participated in the review and adversely influenced the program's decision to decline it. The PI explained that he believed that the competitor's reviews of a proposal to another agency and a manuscript were instrumental in their respective decline or rejection. OIG found no documentary evidence in the jacket that the competitor participated in NSF's review or processing of the PI's NSF proposal. Further, the competitor explained to OIG that if he had been asked to participate, he would have refused because of the PI's reaction to his function as the reviewer of the other agency proposal.

The PI expressed concern about the content and technical accuracy of certain reviews. He also suspected that the competitor authored or influenced the content of one of the more negative reviews.⁴ OIG could find no evidence to support this latter allegation. NSF reviewers are not restricted on how or what they comment on regarding a proposal. It is not uncommon for a set of reviewers to disagree on the merit of a proposed project. Program Officers (POs) are obligated to ensure that their evaluations are balanced and objective and not unfairly tainted by irrelevant review remarks and there was no evidence the review process had been subverted or was unfairly tainted.

The PI objected to inaccuracies in the Panel Summary. OIG found that the Panel Summary did contain some technical inaccuracies but the PO⁵ had amended the Summary with PO Comments to provide necessary balance.

The PI said he tried to call the PO responsible for his proposal multiple times while the proposal was under review and after it had been reviewed. He wanted to alert the PO to his concerns about the competitor. The PI claims the PO never returned his calls. OIG learned that the

¹ [REDACTED] Principal Research Scientist [REDACTED]

² [REDACTED] PI: [REDACTED] co-PI: [REDACTED]

[REDACTED] The proposal was submitted on [REDACTED] and requested [REDACTED] It was declined on [REDACTED]

³ Dr. [REDACTED] a program officer in the [REDACTED] Directorate [REDACTED]

⁴ Dr. [REDACTED] at the University of [REDACTED] authored this particular review.

⁵ Dr. [REDACTED] a program officer in the Division [REDACTED] Directorate [REDACTED]

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reconsideration process identified this issue and the PO was counseled about responsiveness. OIG considers employee behavior issues to be management's responsibility. Management handled the PI's concerns appropriately.

The PI said the reconsideration was incomplete because the letter he received from the Assistant Director⁶ (AD) explaining the rationale for not reversing the decline had not responded to his concerns regarding NSF staff. The PI raised his concerns with the AD, who responded in a second letter to the PI clearly explaining that the competitor had not participated in any form in NSF's review and decision process. The AD also apologized for the PO's behavior and explained that the PO had been counseled.

OIG found no evidence of a conflict of interests or that the reconsideration process inappropriately evaluated the issues raised by the PI.

This inquiry is closed and no further action will be taken in this matter.

cc: Investigations, IG

⁶ Dr. [REDACTED] the Assistant Director for the Directorate [REDACTED]