



NATIONAL SCIENCE FOUNDATION  
OFFICE OF INSPECTOR GENERAL  
OFFICE OF INVESTIGATIONS

## CLOSEOUT MEMORANDUM

Case Number: A03050023

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This case originated in an audit finding of non-compliance. The institution<sup>1</sup> did not have a financial conflict-of-interest policy that met requirements found in NSF Grand Policy Manual (GPM) Section 510. The institution agreed with the findings of the audit<sup>2</sup> and agreed to implement a compliant financial conflict-of-interest policy.

When we contacted<sup>3</sup> the institution as part of our inquiry, we determined that no action had been taken to put into place a compliant conflict-of-interest policy. We emphasized the seriousness of non-compliance, and the potential consequences of continued failure to act. As a result, the institution proposed modifications to their current regulations to bring it into accordance with the requirements set forth in section 510 of GPM. The revised regulations were approved by the chancellor of the institution on January 6, 2004.<sup>4</sup> Additions<sup>5</sup> to the regulations that deal with potential sanctions for violation of the policy were put in place in April 2004.

The institutional regulations now appear to be in compliance with NSF requirements.

Accordingly, this case is closed.

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<sup>1</sup> Redacted.

<sup>2</sup> Redacted.

<sup>3</sup> Redacted.

<sup>4</sup> Redacted.

<sup>5</sup> Redacted.