



NATIONAL SCIENCE FOUNDATION  
OFFICE OF INSPECTOR GENERAL  
OFFICE OF INVESTIGATIONS

## CLOSEOUT MEMORANDUM

Case Number: A04050035

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We received a referral from the Office of Audit concerning the absence of Institutional Review Board (IRB) review of approval for an NSF supported project.<sup>1</sup> From the submitted description of the project it appeared that the PIs<sup>2</sup> intended to gather longitudinal data about students that were identifiable by student. They intended to collect grades, attitudes and success subsequent to participation in the NSF supported project.

The PI<sup>3</sup> told us he was unfamiliar with the IRB process. When we explained what an IRB was, the PI stated that it was a research grants administrator responsibility. He subsequently informed us that he had obtained IRB approval.

The IRB Administrator<sup>4</sup> explained that the institution<sup>5</sup> would have considered this project to be exempt from the regulation if the data had been collected anonymously or was to be used for internal purposes only (similar to a university's internal analysis of its own student enrollment and progress). However, because the PIs intended to publish and present the data the Administrator concluded that the project was covered by the regulation and the project was nonexempt.

The project received a 1-year approval.

Having resolved the issue of IRB review and approval of this grant, 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