



NATIONAL SCIENCE FOUNDATION  
OFFICE OF INSPECTOR GENERAL  
OFFICE OF INVESTIGATIONS

## CLOSEOUT MEMORANDUM

Case Number: A11020013

Page 1 of 1

An institution<sup>1</sup> notified us that it had identified the misapplication of NSF funds<sup>2</sup> by its PI<sup>3</sup> in the administration of a scholarship program. The institution specifically identified students who received scholarship assistance while technically ineligible under the program.<sup>4</sup> The institution also informed us that the PI had failed to constitute and utilize the scholarship selection committee as described in the NSF award. When we asked for additional documentation, we learned that the institution had not obtained a financial conflict of interest (COI) disclosure from the PI under the rationale that the NSF policy did not apply to scholarship programs. We identified no such exception or supportable rationale for that position.

The institution has taken steps to obtain COI disclosures and to utilize the selection committee as described in the proposal.

Accordingly, this case is closed.

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<sup>4</sup> The total amount involved was less than 1% of the total award amount.