NATIONAL SCIENCE FOUNDATION
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS

CLOSEOUT MEMORANDUM

Case Number: A11090060

We received two allegations that two panelists (Subject 1[1] and Subject 2[2]) may have violated NSF's conflict of interests (COI) rules by reviewing proposals with which they had a COI with the PI. NSF provides panel reviewers with examples of affiliations that it asks them to disclose for consideration of potential COIs before reviewing proposals by PIs or co-PIs with those same affiliations. NSF provides prospective panelists with an oral briefing and a written COI form, which panelists are asked to review and sign.

Both subjects participated as reviewers of proposals submitted by PIs at a time when they were serving on a journal's editorial board with that PI (Subject 1 reviewed proposals A and B submitted by PI-1 while both were affiliated with journal 1,[3] and Subject 2 reviewed proposal C submitted by PI-2 while both were affiliated with journal 2).[4] Neither subject disclosed to NSF an affiliation with the journal, the PI, or any potential COI with the proposals. We wrote to the subjects and asked about the non-disclosures. Subject 1 explained her affiliation with the journal and that she didn't work with PI-1 on any articles. She provided a definition of co-editing and concluded that, by this definition, she did not have a COI with PI-1. She also noted how difficult it would be to keep track of all her co-editors. Subject 2 apologized for the failure to disclose, but explained that he had never worked with PI-2 in any editorial capacity.

We asked the NSF Program Officers (PO1 and PO2) who handled these proposals for an assessment of Subject 1's and Subject 2's reviews, and both stated there was no evidence of bias in the reviews. We concluded the subjects should have disclosed their affiliation to NSF, but given the subjects' indirect affiliations with the respective PIs, together with their neutral reviews, we closed this case. However, the subjects expressed some misconceptions about the review process, disclosures, and the determination of COIs, so we wrote clarification letters to each explaining that they if they simply disclose their affiliations to NSF, NSF would determine if any COIs existed.

---

[1] [redacted].

[2] [redacted].

[3] [redacted] was the PI of [redacted] (proposal A) and [redacted] (proposal B). Subject 1 and PI-1 were both on the editorial board of journal 1: [redacted].

[4] [redacted] was the PI of [redacted] (proposal C). Subject 2 and PI-2 were both on the editorial board of journal 2: [redacted].