



NATIONAL SCIENCE FOUNDATION
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS

CLOSEOUT MEMORANDUM

Case Number: I-16-0098-O

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We received two allegations against a University professor (the subject), who was serving as a rotator at NSF through the Intergovernmental Personnel Act program. The first allegation was that the subject violated NSF's conflict rules by submitting a proposal to NSF, without naming a substitute negotiator, while she was serving as a rotator. The second allegation was that the Current and Pending Support forms submitted with her proposals were inaccurate due to omissions, thus misrepresenting her research obligations.

Prior to the subject's arrival at NSF, a divisional conflict-of-interests assessment concluded she was required to name a substitute negotiator for her active awards while serving as a rotator. The Designated Agency Ethics Official (DAEO) later confirmed this assessment, adding that it extended to the 1-year cooling off period after the subject returned to her university. We examined NSF's records and found no documentation that any of the subject's active or pending proposals had a substitute negotiator. After we asked the DAEO if NSF was going to inform program staff about the subject's requirement, she re-evaluated the subject's original conflict of interests and overturned the original divisional assessment and her original decision. The DAEO concluded the subject was exempt from the typical conflict rules, including naming a substitute negotiator, which obviates this allegation.

We reviewed the Current and Pending Support forms in the subject's proposals and found every proposal submitted in the last 2 years contained omissions of active and/or pending proposals. The subject said the omissions were accidental based on her understanding that the University's review had verified their accuracy. Additionally, she was unaware that NSF expected the following types of proposals/awards to be listed: a) those on which she was co-PI; b) those that were non-NSF; and c) those for which she requested a no-cost extension. We spoke with the University's Authorized Organizational Representative (AOR), who said the PI is responsible for creating an accurate listing, but that listing is supposed to be verified before submission to NSF. We sent letters to the subject and the AOR reminding them of NSF's requirements for the Current and Pending Support forms.

This case is **closed** with no further action taken.