



NATIONAL SCIENCE FOUNDATION
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS

CLOSEOUT MEMORANDUM

Case Number: I02090023

Page 1 of 2

We received an allegation that a high-level NSF employee¹ authored and edited publications under her Independent Research and Development ("IR/D") agreement without acknowledging NSF support. It was further alleged that the employee had relied on an uncompensated NSF support staff member² to type the publications.

With regard to the first allegation, we reviewed the NSF policies regarding acknowledgement of NSF support and determined that no such policies existed for IR/D plans. We also reviewed the high-employee's IR/D agreement and confirmed that it also did not address the issue.

We conducted a review of publications of permanent NSF employees with IR/D plans.³ This review indicated that half of the employees either provided NSF acknowledgement or identified NSF as their mailing address, while the other half used the address of another institution. We then interviewed five NSF permanent employees who acknowledged NSF support differently. All interviewees stated that a NSF policy setting forth specific language would be beneficial. Accordingly, we closed our investigation into this allegation and recommended in a memo to the agency that NSF develop guidance on this issue for IR/D participants.⁴

Our memo to NSF detailed the results of our investigation and recommended NSF develop a policy describing how permanent NSF employees should acknowledge NSF support in their IR/D-related publications. According to our memo, this policy should include specific guidance on the use of: 1) NSF's address for contact information; 2) acknowledgments for NSF support; and 3) disclaimers regarding NSF support.

With regard to the second allegation, we spoke to a representative of the Office of Government Ethics and confirmed that support staff can assist employees with IR/D plans but that assistance cannot interfere with other official duties. We then reviewed the position description of the support staff member and interviewed her supervisor.⁵ We were unable to determine whether the use of the staff member was inappropriate because the staff member's duties in connection with

¹ Footnote Redacted.

² Footnote Redacted.

³ At the time of this investigation, 108 NSF employees had active IR/D plans. Twenty-nine of these employees were permanent.

⁴ Footnote Redacted.

⁵ Footnote Redacted.

	Agent	Attorney	Supervisor	AIGI
Sign / date				



NATIONAL SCIENCE FOUNDATION
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS

CLOSEOUT MEMORANDUM

Case Number: I02090023

Page 2 of 2

the IR/D publications were commingled with other official duties. We also determined that the staff member had refused compensation or compensatory time for her work in excess of the 8.5-hour workday.⁶ Therefore, we closed our investigation into this allegation.

Accordingly, this case is closed.

⁶ An 8.5-hour workday refers to 8 hours of work and one half hour of lunch.