CLOSEOUT FOR M91050023

This case was brought to OIG on May 7, 1991 by [redacted] a program officer in the Division [redacted]. He had received a proposal [redacted] that had also been submitted to the Division [redacted] Neither division had initially been informed that the proposal had been submitted to both. They discovered the dual submission when the principal investigator, [redacted] of [redacted] University (the subject), having heard informally that [redacted] expected to fund the proposal, called the program officer in [redacted], to inquire about the possibility of joint funding. Under questioning from the program officer, the subject admitted that the two proposals were in fact identical, and not merely similar. He explained that he had previously discussed joint funding with a rotating program officer in [redacted] who had since left NSF.

OIG examined other proposals from the subject and determined that this instance of dual submission without informing relevant program officers seemed to be an isolated incident. OIG also determined, however, that the subject's Form 1239s, which are supposed to list all current and pending support, regularly contained incomplete and inaccurate information. The subject frequently omitted current awards or pending proposals and listed titles and award amounts inaccurately.

OIG wrote to the subject and to the Authorized Institutional Representative at his university. The subject explained that he was not seeking double funding, but did not indicate that he understood the problems with his Form 1239s. The university reprimanded the subject for not fully informing them or NSF about his research plans and commitments. It inserted a notice in its regular research newsletter informing faculty about the importance of providing this information to granting agencies.

OIG wrote to the subject again, detailing the inaccuracies in his Form 1239s and noting that two proposals that followed the university's reprimand continued to contain inaccuracies. In his reply, the subject admitted some inaccuracies, but attributed most of the problem to his decision to delete pending proposals when he informally heard from program officers that declinations would be recommended and to delete current awards when the research had been completed but before the final report (Form 98A) had been submitted. OIG tracked the subject's proposal history and found some support for his explanation, but found instances where inaccuracies and omissions could not be explained in these ways. We also examined his two most recent proposals and found their statements of current and pending support to be substantially accurate.

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OIG wrote to the subject noting the deficiencies in his past actions and explaining that we expect his future Form 1239s to be fully and accurately completed, with exact proposal and award titles and dollar amounts. We pointed out that the form is an important tool for detecting fraud and abuse, including attempts to secure double funding, and is in any event an administrative requirement. We wrote to the Authorized Institutional Representative reiterating our concerns about this problem and urging him to give the subject's Form 1239s special scrutiny in the future.

OIG also sent a memorandum to the division directors whose programs had received proposals from the subject in the past and to the director of the [redacted]. In it, we informed them that the subject had a history of inaccuracies in his Form 1239s and that these may have misled NSF program officers about the extent of his research commitments. We asked that they review the subject's forms in the future and inform us of inaccuracies. We also suggested that [redacted] consider asking the Authorized Institutional Representative at the subject's university to certify the accuracy and completeness of the subject's Form 1239s. We emphasized that we consider this an administrative matter and not an issue of misconduct in science and stated that the subject's past actions should not prejudice the review of his future proposals.

This case is closed and no further action will be taken.

[redacted]

Concurrence:

Donald E. Buzzelli 11/3/93

Donald E. Buzzelli
Deputy Assistant Inspector General,
Oversight

noted James J. Zwolenik 11/9/93
James J. Zwolenik
Assistant Inspector General for Oversight

L. Nancy Birnbaum
Assistant Counsel to the Inspector General

cc: Signatories
Inspector General

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