

CLOSEOUT FOR M94040019

This case was brought to the attention of OIG on April 19, 1994, by Dr. [REDACTED] program manager for the [REDACTED] Program in the Directorate for [REDACTED]. The program manager told OIG that she was concerned about a possible undisclosed financial conflict of interest on the part of Dr. [REDACTED], the thesis advisor. Dr. [REDACTED] had submitted a thesis advisor's recommendation and a co-sponsor statement in support of Dr. [REDACTED], the applicant's, minority postdoctoral fellowship application (the second proposal). Both the thesis advisor and the applicant are in the Department of [REDACTED] at [REDACTED] University.

The program manager wanted to recommend the second proposal for an award but had been told informally that the thesis advisor and the applicant were married. Neither the thesis advisor nor the applicant had disclosed this information in the proposal. In recent years increasing governmental and institutional emphasis has been placed on scientists disclosing potential or real financial conflicts of interests related to projects they are about to embark on. It is generally expected that full disclosure will be made of any personal relationship a scientist has with an individual for whom the scientist is providing a recommendation. In this case the thesis advisor, as the spouse, stood to gain financially if the proposal were funded, but he had failed to disclose his relationship with the applicant. However, neither the program announcement nor the recommendation or sponsoring scientist forms accompanying it explicitly request disclosure of conflicts of interest. One of the forms contains the questions, "How long have you known the applicant?" and "In what capacities?" The program manager said she had assumed that an individual responding to these questions would disclose marriage to or other personal relationships with the applicant.

OIG contacted the applicant and the thesis advisor and learned that they were in fact married. Both the applicant and the thesis advisor said that they thought this information had been disclosed in the proposal. The applicant told OIG that she had submitted similar proposals to the NSF [REDACTED] Program (the first proposal), to Health and Human Services (HHS) (the third proposal), and to one private foundation, and that the thesis advisor had submitted recommendations supporting each proposal. She believed that the thesis advisor had disclosed their personal relationship in those recommendations.

OIG retrieved and reviewed the relevant records for the first and third proposal. The first proposal was submitted one month before the second, which, in turn, was submitted a few

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days before the third proposal. The thesis advisor had disclosed his relationship with the applicant in his submissions supporting the first and third proposals.

When asked about the omission of the information in his recommendation in support of the second proposal, the thesis advisor said that he had submitted his responses to the questions on the first proposal's recommendation form on sheets attached to that form. OIG noted that following most of the questions on that form the thesis advisor had typed, "see attached sheet." However, the thesis advisor said that he thought that, unlike NSF's requirements for the first proposal, NSF required that the information he supplied in support of the second proposal be typed on the form provided with that proposal's program announcement. He said that space constraints imposed by the form required that he edit and abbreviate the information he had previously attached to the form provided with the first proposal's program announcement. He said that during the editing process he must have inadvertently deleted the disclosure of their marriage. OIG noted that the information submitted by the thesis advisor in support of the second proposal was an abbreviated version of that submitted in support of the first proposal. It was contained on the provided form, not on attached sheets.

The program announcements for both NSF programs specify that "recommendations must be prepared on the forms provided" OIG could find no basis for the thesis advisor's impression that he was to use the form for his recommendation supporting the second proposal but not for the recommendation supporting the first. The forms accompanying the two NSF program announcements require similar information from the applicant and the individuals submitting recommendations or sponsor statements. However, the stipend amounts and allowances for research costs associated with the awards made for the first and second proposals are very similar. OIG concluded that, if funded, either one of the two NSF proposals would have provided the same potential financial gain to the thesis advisor. Thus there was no compelling financial reason why the thesis advisor would have intentionally disclosed his relationship in the first proposal, omitted it from the second, and then included it in the third proposal.

OIG concluded that, because the thesis advisor had disclosed his relationship with the applicant in two NSF and HHS proposals, there was reasonable evidence to support the thesis advisor's position that he had inadvertently omitted the information from the form submitted in support of the second proposal. At OIG's suggestion, the thesis advisor submitted a disclosure letter to the program. At the program manager's request, the applicant had another individual submit a recommendation, to substitute for the thesis advisor's. OIG concluded that the proposal record had been corrected and there was insufficient substance to pursue this matter further.

This case was closed.

cc: Staff Scientist, Deputy AIG-Oversight, AIG-Oversight, IG