

## CLOSEOUT FOR M-97090027

On 5 September 1997, OIG received a letter from the complainant<sup>1</sup> in which he expressed concern about possible unethical behavior by the subject.<sup>2</sup> Specifically, the complainant was concerned that the subject's part ownership of a small company<sup>3</sup> affected his judgment about some of his research. The complainant explained that this small company participated in a state-initiated<sup>4</sup> and -supported experiment for waste reclamation. Consequently, the complainant alleged that the subject's association with the company created a conflict of interests (COI) that impaired the objectivity of his state-supported research. The complainant stated that the subject's institution had been contacted twice by letter about this and other issues related to the experiment.

OIG reviewed the subject's proposal and award history. The subject submitted six proposals to NSF over 11 years between March 1984 and May 1995. He received one award in 1984,<sup>5</sup> but, since that time, he has received no NSF support. In 1995, when the subject submitted his most recent proposal,<sup>6</sup> NSF's current COI policy was not in effect. At that time, NSF held the grantee institution "primarily responsible for regulation of potential or actual conflicts of interest,"<sup>7</sup> urging them to adhere to sound principles. Under NSF's current COI policy, institution organizational representatives must certify that a written COI policy is implemented and enforced. This policy requires that any identified conflicts of interests be managed "prior to the institution's expenditure of any funds under the award."<sup>8</sup> OIG concluded that there was no need to take further action in this case because the institution has been informed about the subject's alleged COI, and no Federal funds were expended since the subject's proposal was declined.

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

cc: staff scientist, AIG-Oversight, legal, IG

1  
2  
3  
4  
5  
6  
7  
8