

Using Electronic Means to Handle Conflict of Interests Recusals by NSF Staff

NSF staff avoid conflicts of interests (COIs) by recusing themselves from handling proposals and awards with which they have an actual or possible appearance of a conflict because they have an affiliation or relationship with an institution, person, or project. Traditionally, each NSF program division handled COI recusals manually, with each staff member being responsible for informing the division's conflicts official about proposals/awards, individuals, and institutions from which the staff member should be recused.

NSF's electronic proposal system includes a conflict of interests module which staff can use to declare and record any institutional, individual, or proposal conflicts. We reviewed the use of this module by NSF's divisions and concluded that it has several advantages over manually checking for conflicts of interests. Therefore, we recommended that NSF require staff to use the COI module in the electronic proposal system. We also recommended that NSF ensure that all relevant staff receive training in the use of the module and make other technical improvements. NSF's decision is pending.