

Improving NSF's Management of Reviewer's Conflicts of Interests

As noted previously, OIG recommended that NSF take several steps to improve the information both the agency and reviewers exchange regarding potential conflicts of interests (COIs). However, NSF informed us that it would not implement any of our recommended changes for improving the way it handles its reviewer COIs because it does not perceive any systemic deficiencies affecting the current review process. Accordingly, we provided an expanded explanation of the reasons for our recommendations, which focused on ensuring that reviewers were apprised of situations that could be construed as COIs and had ample opportunity to disclose potential conflicts to NSF. Since *ad hoc* reviewers³⁷ do not receive information about COIs and sign the form that panel reviewers do, we believe it would be helpful to provide them this same information and ask them to check a box affirmatively indicating they do not have a COI that would prevent them from performing their review duties objectively. Improving this information and disclosure process can enhance NSF's merit review system by ensuring its objectivity.

We also noted that our recommendations are consistent with NIH's longtime practices. NSF and NIH both ask the research community to review tens of thousands of basic research proposals each year, and probably rely on a substantially overlapping pool of reviewers. Thus, it is likely that there are many NSF reviewers already familiar with COI processes embodied in the recommendations we are making. NSF and NIH have the same interest in ensuring their reviewers understand what constitutes a potential COI, and the same interest in having those COIs disclosed to the program officials. NIH already does all of the things we recommend that NSF do, and these are tried and proven practices that we believe would serve NSF well in avoiding potential COI problems with reviewers.

In our view, NSF's commitment to the training and education of not only its staff, but also the support it provides to the community it serves, should not be premised on whether there is a legal requirement to do so. There is currently a dearth of COI training resources available for reviewers, apart from the standard COI briefing provided only to panel reviewers, which NSF can, and we believe should, rectify. NSF is reevaluating our recommendations and informed us it has sought the advice of the Office of Government Ethics (OGE) regarding our recommended revisions to the certification form the panelists receive that contains guidance about COIs. To

facilitate OGE's assessment, we provided OGE with our review and supplemental information

