



NATIONAL SCIENCE FOUNDATION
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS

CLOSEOUT MEMORANDUM

Case Number: A03050024

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The allegation of non-compliance with NSF requirements for an institutional conflict of interest policy was conveyed in a referral from OIG audit, responding to findings contained in an audit completed for NSF by _____, LLP in 2002.

_____ of _____) faxed the updated conflict-of-interest (COI) policy for _____ applicable to NSF grants. The date on this policy is given as May 2003. This supplement to policy 1710 was adopted as a result of the findings of an earlier audit and finding (see previous case analysis). The genesis of the policy is the NSF Grants Policy Manual, and the wording is therefore substantially similar to the GPM.

The _____ policy requires investigators to complete a COI form at the time the proposal is submitted, updated annually or as a significant change occurs. The form is reviewed by the cognizant academic Dean, the Vice President for Academic Services, and the Grants Accounting Coordinator in Business Services, who act to manage or reduce conflicts and report unresolvable issues to NSF OGC. Failure to comply with the disclosure requirements is subject to sanctions as specified in the bargaining agreements. Subcontractors and other flow through entities are required to adopt compliant COI policies. Records are retained for the NSF-specified period of three years beyond termination or completion of the grant.

The new _____ COI policy appears to be in full compliance with NSF requirements. We emailed to _____ suggested changes in wording that clarified the definition of "significant financial interest" on the policy page itself, and brought the definition of investigator on the policy and the disclosure form itself into concordance.

Accordingly, this case is closed.