



NATIONAL SCIENCE FOUNDATION  
OFFICE OF INSPECTOR GENERAL  
OFFICE OF INVESTIGATIONS

## CLOSEOUT MEMORANDUM

Case Number: A05050022

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During a review of REU site awards for compliance with human subjects regulations and animal welfare policies, we identified an award<sup>1</sup> involving software development for therapeutic purposes. Based on the annual reports for the award, it appeared that the software was tested on human subjects, including young children, and that the REU project evaluation may also require Institutional Review Board (IRB) approval. When we contacted the institution,<sup>2</sup> it reported that it had the appropriate IRB approvals for the project but through "several oversights" failed to indicate that on the proposal coverpage. It also had not properly declared an exemption from further IRB review for the evaluation part of the award.

At our suggestion, the institution volunteered to conduct an internal review of its active NSF awards and pending proposals to determine whether the clerical oversight was part of a larger problem. After identifying several instances of additional "oversights" the institution took the initiative to request corrections to the award and proposal jackets. The institution also identified gaps in its procedures for reviewing subawardee compliance and implemented new procedural steps to allow for provisional review of projects.<sup>3</sup>

We are satisfied that the institution has taken appropriate steps to correct its "oversights" and to prevent future "oversights."

Accordingly, this case is closed.

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<sup>3</sup> The provisional review, as we have seen at other institutions, allows for the IRB to review a project in which human subjects work is expected but where the final protocols or project direction has not been fully established. This situation arises frequently in REU site awards where the students do not pick their projects until after NSF makes the award.