



NATIONAL SCIENCE FOUNDATION
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS

CLOSEOUT MEMORANDUM

Case Number: A0605000/20

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We identified an institution¹ with a Research Experiences for Undergraduates (REU) award² that appeared to involve human subjects in its evaluation component although the "Human Subjects" box on the NSF proposal cover page was not checked. We contacted the institution which expressed its misunderstanding of the applicability of the human subjects regulation to evaluations of that type; the need to declare the exemption to NSF in the proposal process; and the necessity that its Institutional Review Board (IRB) have an approved assurance from the Office of Human Research Protections (OHRP). As a result the institution sought and received OHRP approval for its IRB and undertook a review of all active NSF awards and pending NSF proposals to ensure compliance. The REU award and six other awards were determined to qualify for exemptions, but one other award³ and a pending proposal⁴ were found to be lacking the appropriate review. The award and pending proposal were both reviewed and the institution has taken steps to update the respective NSF program officers.

Accordingly, this case is closed.

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[Redacted content]