



NATIONAL SCIENCE FOUNDATION
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS

CLOSEOUT MEMORANDUM

Case Number: A09050044

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We learned that a panelist¹ had participated in the review of a proposal² submitted by a PI³ with whom he had coauthored a paper⁴ within the year prior to the panel.⁵ The panelist arrived late to the panel, did not receive a conflict of interests (COI) briefing from the program officer before participating in discussions of the proposal, and signed the NSF COI disclosure form⁶ afterward without disclosing the conflict to the program officer. The COI disclosure form was an altered version of the standard form, in pertinent part lacking the examples of apparent COIs. The panelist had participated on two other panels in the preceding three months in two other directorates.⁷ Documentation for those directorates consisted of similarly altered COI forms, with no specific documentation of the COI briefings provided. Therefore, the evidence available was insufficient to demonstrate that the panelist understood his obligation to disclose the relationship. We have reiterated the importance of disclosing all apparent COIs prior to any discussion of proposals while reviewing as a panelist. We communicated to NSF an apparent failure in the administration of panelist COI briefings and documentation.

Accordingly, this case is closed.

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⁴ The particular covered relationship in this case is collaboration in a publication within the last 48 months with a person who has a financial interest in the proposal under consideration.

⁵ The panel was administered in the DMR division of the MPS directorate.

⁶ NSF Form 1230P.

⁷ The panels were administered in the CMMI division of the ENG directorate and the DGE division of the EHR directorate.