



NATIONAL SCIENCE FOUNDATION
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS

CLOSEOUT MEMORANDUM

Case Number: I-03110050

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As part of a review of awards for conferences, workshops, and symposia, we requested information about a grant¹, from the grantee.² In response to our letter requesting grant records and information about any program income, the grantee forwarded materials to us on 17 September 2003. There were two issues, unallowable costs and a possible conflict of interests (COI).

Unallowable costs: The award supported a three-day workshop. The bill for the workshop services included charges for catering for a "Social & Buffet," and the overall hotel bill for the conference included the costs for an open bar followed by a catered dinner. We wrote to the grantee concerning the unallowability of the costs of alcohol and social events, and in response the grantee said that it would return \$680.53 to NSF, which it subsequently did.

COI: The NSF Program Officer³ (the PO) was a vice chairman of an entity involved in international coordination of research efforts in this field, but the PO did not "obtain written permission from an ethics counselor in OGC before participating as a policymaking officer for any research or educational institution, any scientific society, or any professional association," as required by § 50(b)(2) of NSF's COI Manual. The workshop schedule listed the PI as providing the perspective of NSF and this entity.

The PO said he has attended the DAEO's annual COI briefings. Although he did not seek specific permission from the DAEO, he noted that he began serving with the entity before coming to NSF 6 years ago, and described that service in his IDP each year. The DAEO told us that he reviews all IDPs, and we believe this is sufficient to comply with the permission requirement in § 50(b)(2) of NSF's COI Manual.

With regard to the workshop, the PO said he had not written or paid attention to the schedule, and he was there to give the NSF view, not the entity's. He also said that he has never received any direct salary from the entity. The entity did pay his expenses once or twice to attend meetings, and beforehand he sought and obtained approval from the DAEO. The PO stated that he is not involved in the entity's activities relative to the NSF-funded project that grew out of the workshop, and he did not think that any NSF money goes to the entity.

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The PO has not conducted himself in a manner that creates either an actual or apparent COI.

Conclusion: Accordingly, this case is closed.