Society of Research Administrators

Research Integrity
Government-Wide Efforts

Christine Boesz, DrPH
Inspector General, National Science Foundation
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Research Integrity:
Institutional Responsibilities

✔ Misconduct in Research

✔ Compliance Responsibilities

✔ Cost Sharing

✔ Education for Prevention

Misconduct in Research

OSTP Policy on Misconduct in Research

Policy issued in December 2000

✓ New definition and procedures apply to all Federal agencies supporting internal or external research.

✓ OSTP Implementation Group consists of members from all major Federal agencies.

✓ Inspector General (IG) Community Involvement

What is Research Misconduct?

✓ <u>Fabrication</u> = making up results and recording or reporting them.

✓ <u>Falsification</u> = manipulating research materials, equipment, or processes or changing or omitting data or results such that the research is not accurately represented in the research record.

✓ <u>Plagiarism</u> = the appropriation of another person's ideas, processes, results, or words *without giving appropriate credit.*

IG Misconduct in Research Working Group

✔ Includes IG membership from over 20 federal agencies.

✔ Assesses interrelationship of research misconduct and "Fraud, Waste, and Abuse."

✔ Assesses IG role for investigating allegations and overseeing agency process.

✔ Develops guidelines and training for investigations.

What We've Learned about Fair Misconduct in Research Proceedings

✓ A consistent method for:

    ✓ handling cases and

    ✓ informing IG or responsible agency of allegations.

✓ The process must:

    ✓ be viewed in broader context.

    ✓ maintain confidentiality.

    ✓ foster thoroughness.

    ✓ address gathering and protecting evidence.

    ✓ allow for evaluating intent and act.

    ✓ be based on a preponderance of the evidence.

Compliance Responsibilities

Compliance Responsibilities

NSF's expectation is that the institution <u>has full responsibility</u> for:

✓ the conduct of the project.

✓ making sound scientific and administrative judgements.

✓ prudent management of all expenditures.

Reference: NSF Grant General Conditions, Article 1

Compliance Responsibilities

Institution has responsibilities in 3 areas:

✓ Administrative Management

✓ Research Management

✓ Financial Management

Compliance Responsibilities

Administrative Management

✓ Conflicts of Interest

✓ Research Misconduct

✓ Lobbying

✓ Patent Disclosure

Compliance Responsibilities

Research Management

✓ Human Subjects Review

✓ Animal Welfare

✓ Radiation Safety

✓ Biosafety

✓ Collection Permits

✓ Variety of Environmental Permits

✓ Change or Absence of PI

✓ Progress and Final Reports

Compliance Responsibilities

Financial Management

✓ Project/Research Oversight

✓ Cost Principles

✓ Subcontracting

✓ Cost Sharing

Cost Sharing

Strategic Areas for OIG Audit Plan

✓ Financial Management

✓ Procurement

✓ Information Technology

✓ Human Capital

★ Award Administration

★ Awardee Financial Accountability & Compliance

★ Program & Project Management

What is Cost Sharing?

Cost sharing = all contributions, cash or in-kind.

✓ Cash: Monetary $upport

✓ In-kind: Non-monetary items

  ✓ donated effort
  ✓ space
  ✓ unrecovered indirect costs, etc.

Reference: OMB A-110, Subpart C (23)

Auditing Cost Sharing

Allowable cost sharing must be:

✓ <u>verifiable.</u>

✓ a <u>specific</u> contribution for only one federally-assisted project.

✓ <u>necessary and reasonable</u> for project objectives.

✓ <u>allowable</u> under the applicable cost principles.

✓ <u>not paid by the federal government</u> under another award, except where authorized.

✓ provided for <u>in the budget</u> (NSF's line "M").

Reference: OMB A-110, Subpart C (23)

NSF's Cost Sharing Policy

✓ Requirements will be clearly stated in the proposal announcement.

✓ "Eligibility" rather than a "review" criterion.

Reference: NSF Important Notice 124

Recurrent Audit Issues in Cost Sharing

✓ Cost sharing was overstated to make proposals more competitive.

✓ Auditors found that institutions were not meeting their promised cost sharing.

Recurrent Audit Issues in Cost Sharing

✓ Sub-recipient monitoring

✓ Cost-sharing certifications

✓ Accounting systems

✓ Documentation

Non-Compliance

?????????????

Education/Prevention

Consequences of Noncompliance

✓ May apply to either the institution or to the principal investigator

✓ Range from:

  ✓   Special Oversight/Review Status
  ✓   Administrative Sanctions
  ✓   Repayment of Grant Funds
  ✓   Suspension or Termination of Awards
  ✓   Debarment

✓ NSF Decides

Education ➠ *Prevention*

✓ Education

    ✓ Identify specific responsibilities

    ✓ Training and communication

    ✓ Resources

✓ Prevention

    ✓ People and attitudes

    ✓ Compliance systems

    ✓ Integration of people and systems

    ✓ Common sense

Questions? Need Info?

National Science Foundation

Office of Inspector General

Internet: www.oig.nsf.gov

Email: oig@nsf.gov

Hotline: 1-800-428-2189