

# Office of the Inspector General

NSF Regional Grants Conference

October 4-5, 2004

St. Louis, MO

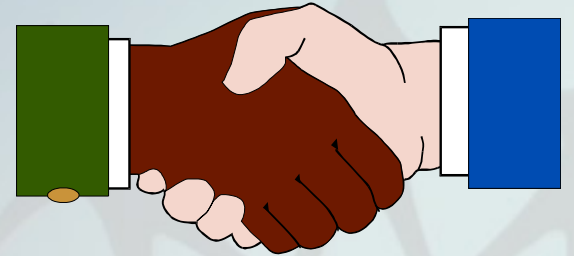
**Hosted by: Washington University**

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# How does OIG work with NSF and the Research Community?

- ◆ Investigates allegations of:
  - \* fraud, waste, and abuse
  - \* research misconduct
  - \* violation of related regulation, directive, policy
  
- ◆ Conducts audits:
  - \* Financial
  - \* Performance
  
- ◆ Outreach
  - \* informational brochures
  - \* ethics seminars



# How might we interact with each other?

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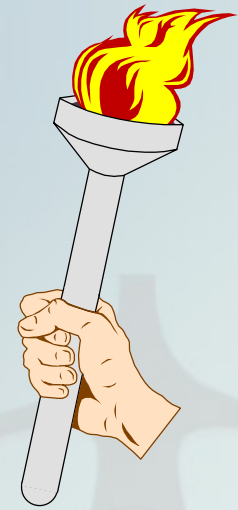
- ◆ Provide information as an advisor or expert
- ◆ Participate in performance and financial reviews
- ◆ Participate in OIG's or awardee's inquiry or investigation
- ◆ Participate in an Outreach seminar or training session
- ◆ Seek assistance to resolve issues and questions

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# Guiding Principles of Investigation

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- ◆ Partnerships
- ◆ Confidentiality
- ◆ Focus on substantive issues
- ◆ Fair, accurate, and timely products
- ◆ Reliance on carefully documented evidence
- ◆ Prospective impacts



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# What do we do with allegations?



- ◆ Investigate criminal, civil, administrative allegations
- ◆ Refer to federal, state, local authorities; referral for audit
- ◆ Criminal or civil outcomes:
  - Fines, settlements, incarceration for embezzlement, false Statements/claims
- ◆ Administrative outcomes:
  - Certification, assurances, debarments, restrictions on awards, limit activities on awards for research misconduct or other administrative misdeeds

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# NSF Regulation on Research Misconduct

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- ◆ Tracks OSTP's Federal policy on research misconduct
- ◆ Defines **F**abrication, **F**alsification, **P**lagiarism
  - ✱ violation of peer review
  - ✱ defines "research" and the "research record"
- ◆ 67 FR 11936 (March 18, 2002)
- ◆ 45 CFR Part 689

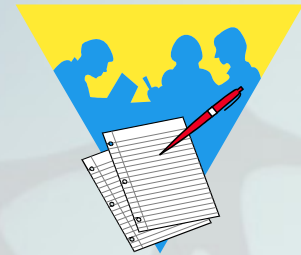
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# To what do you certify when you submit a proposal?

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- ◆ Compliance with award terms and conditions
- ◆ Accuracy and completeness of statements
- ◆ COI Policy
- ◆ Drug-Free Workplace
- ◆ Debarment and Suspension
- ◆ Lobbying (proposal >\$100,000)



Providing False Information  
Violates U.S. Code, Title 18,  
Section 1001.

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# What are some current issues?

- ◆ Compliance with Federal Regulations and U.S. Codes
- ◆ Human Subject Protection
- ◆ Animal Welfare
- ◆ Conflicts of Interest
  - ✱ SBIR
  - ✱ Consulting
- ◆ Ethics and skill training
- ◆ C&P Support Accuracy
- ◆ Cost-sharing Documents
- ◆ Program Income/ Participant Support

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# Keys to Success



- ◆ Know requirements (award letter and manuals)
- ◆ Focus on research objectives
- ◆ Good accounting practices—sufficient support documents
- ◆ Document approvals by and conversations with awardee and NSF program and grant officials
- ◆ Ask if you have questions!!!!

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# Outreach

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- ◆ Seminars and case studies
  - ✱ For students, PIs, and administrators
  - ✱ Emphasize education and partnerships
  - ✱ NSF's and your institution's procedures
  - ✱ OIG web site contains training materials
  - ✱ brochures
- ◆ On-site assistance with matters related to Investigations and NSF activities

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# When should you contact us?

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- ◆ Allegations of wrongdoing
  - \* Research misconduct
  - \* Financial fraud, theft
  - \* Violation of research related regulations, directives or policy
- ◆ Significant administrative or financial problems
- ◆ Financial fraud or theft that involves NSF activities
- ◆ Participate in or arrange an Outreach seminar or training session

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# Audit Efforts

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- ◆ Financial Audits
- ◆ Performance Audits

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# Audit Findings & Resolution

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## ◆ Common Areas for Audit Findings

- ✱ Costs

- ✱ Award Administration

- ✱ Subrecipient Monitoring

- ✱ Cost Sharing



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# Costs

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- ◆ Allowable, reasonable, allocable, documented, consistent treatment of costs
  - \* Unsupported Expenditures
    - Reimbursements not documented (invoices, etc.)
    - Time and Effort not timely, not signed/certified
  - \* Unallowable Expenditures
    - Direct charges for costs in the indirect pool
    - Overload Salary (unless NSF-approved)
    - Meals, alcohol

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# Award Administration

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- \* Financial Management System
  - Have procedures for determining allowability of costs
  - Obtain approvals
  - Compare budget to actual expenditures
- \* Document Participant Support per award
- \* Ensure Accuracy and Timeliness of Reporting and Notifications
- \* Maintain Equipment Inventory

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# Subrecipient Monitoring

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Responsible for Program and Financial Oversight

- ✱ Ensure Award Terms/Federal Requirements Are Followed
- ✱ Assess and Monitor Subrecipient's Capability
  - Reporting, site visits
  - A-133 audits
- ✱ Ensure Timely and Appropriate Corrective Action

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# Cost sharing

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- \* No Federal Funds
- \* Track Cost Sharing per Award (no duplication)
- \* Documented and Certified (AOR >\$500,000)
  - Valuation at actual/fair market value
  - Report annual and cumulative amounts
  - Both Awardee and Subawardee cost sharing

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# Where can I get information on-line?

- ◆ General

[www.oig.nsf.gov](http://www.oig.nsf.gov)

- ◆ Community standards

<http://www.nsf.gov/sbe/ses/sdest/>

- ◆ Grant Conditions

<http://www.nsf.gov/home/grants>

- ◆ Regulations

<http://www.gpoaccess.gov/cfr/index.html>

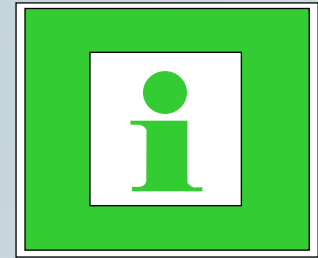


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# How can I contact OIG?

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- ◆ Internet: [www.oig.nsf.gov](http://www.oig.nsf.gov)
- ◆ E-mail: [oig@nsf.gov](mailto:oig@nsf.gov)
- ◆ Phone: 703-292-7100
- ◆ Hotline: 1-800-428-2189
- ◆ Write: 4201 Wilson Blvd.  
Arlington, VA 22230



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