

Ensuring the Integrity of Research



Peggy Fischer
Office of Inspector General
National Science Foundation

NSF's Expectations

- ◆ The **awardee has full responsibility** for the conduct of the project or activity supported under this award and for adherence to the award conditions. Although the awardee is encouraged to seek the advice and opinion of NSF on special problems that may arise, such advice does not diminish the awardee's responsibility **for making sound scientific and administrative judgements** and should not imply that the responsibility for operating decisions has shifted to NSF.
- ◆ By accepting this award, the awardee agrees to comply with the applicable Federal requirements for grants and cooperative agreements and to the prudent management of all expenditure and actions affecting the award.

Reference: NSF's Grant General Conditions, Article 1.

Key Focus Areas

- ◆ Administrative
- ◆ Financial
- ◆ Research



Expectations and Rules

- ◆ Certifications to the Federal Government
 - Lobbying
 - Original Work
 - Conflict-of-Interests Policies
- ◆ Compliance with Federal Regulations
 - Administrative Management
 - Financial Management
 - Research Management
- ◆ Sub-contractors, Suppliers, or Affiliated Researchers

Integrity Spotlight

◆ Administrative Management

- Conflict of Interests
- Research Misconduct
- Lobbying
- Patent Disclosure
- Training Requirements
- Current and Pending Support Information

◆ Financial Management

- Systems Management as described in OMB Circulars
- Contracts and Subcontracts
- Cost Sharing

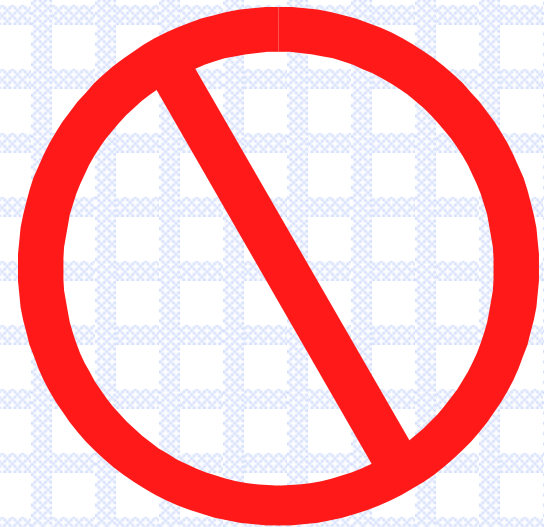
Integrity Spotlight

◆ Research Management

- Human Subjects Review (IRB)
- Animal Welfare (IACUC)
- Radiation Safety
- Biosafety (Recombinant DNA)
- Collection Permits
- Variety of Environmental Permits
- Change or Absence of PI
- Current and Pending Support Information
- Duplicate Proposal Submission to other agencies, to NSF
- Progress and Final Reports

Consequences for Significant Errors*

- ◆ Special Oversight/Review Status
- ◆ Administrative Sanctions
- ◆ Suspension or Termination of Awards
- ◆ Civil/Criminal Violations
- ◆ Suspension/Debarment
- ✓ May apply to either awardee or PI



Education Prevention and Integrity

- ◆ Focus on Integrity: People and Attitude
- ◆ Integration of Process, Documentation, and Education
 - Integrity of system ensuring comprehensive oversight
 - Specific oversight programs, responsibilities
 - ◆ committees function and are properly convened
 - ◆ document work
 - Training programs for managers, researchers, support staff, and oversight staff
 - Partnership and communication between Awardee research, administrative, compliance staff and Agency



Managing Integrity in the Award and Proposal System



Issues and Information

- ◆ Internal Proposal Review and Sign off
- ◆ Award Performance and Financial Monitoring
- ◆ Key Documents and Information
 - GC-1, FDP
 - Grant Proposal Guide
 - Grant Policy Manual
 - Specific Announcement or Solicitation Guidance
 - Program Officer, Grants Administrator
 - NSF Web site www.nsf.gov

Will this form provide you enough information to know that compliance issues raised by the proposed worked were reviewed and approved?

Grant Submission Approval Form

Before a grant proposal is submitted, the proposal with this form attached should be circulated to the officers listed below for their review and authorization. Faculty members should consult the Faculty Grant Submission Guidelines (Faculty Handbook, VIII, 5) for further information. Please allow appropriate time to get the necessary signatures.

Grant Information

Name of grant: _____

Funding agency: _____

Amount: _____ Match needed: _____

Period of expenditure: _____

Signatures: _____ Date _____

~~Principal Investigator or Project Director~~

~~Supervising Dean or Vice President~~

Vice President for Development

Vice President for Finance

Division of Sponsored Research
Proposal Review and Certification Form

For DSR use only.
Date Received: _____
Due Date: _____
Postmark Receipt
ID#: _____

PROJECT TYPE

Competitive Renewal Continuation New Proposal Pharmaceutical Contract Supplemental Request

Account Number, if continuation: _____ Date Proposal Submitted to Sponsor: _____ Previous Proposal Number, if any: _____

INVESTIGATORS

PI Name	PI SSN	PI Phone	PI Fax	PI E-mail Address

Department Receiving Credit for Award: _____ PI's Mail Point: _____

Other Contact (not PI): _____ Contact's Phone: _____ Contacts Fax: _____ Contact E-mail Address: _____

Co-PI Name	Co-PI Phone	Co-PI Fax	Co-PI E-mail Address

(For additional Co-PIs, attach an additional sheet. List employees only.)

SPONSOR

Sponsor/Agency Name: _____

Agency Program: _____

Sponsor Contact: _____ Title: _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Fax: _____ E-Mail: _____

Funding Source: Federal Funded State Funded Local Government For-Profit Corporation
 Nonprofit Organization Non-Universities & Univ.-Related Organizations Intra-Institutional Other

Project Title: _____
**Note: For projects requiring IRB or IACUC approval, the project title entered here must be the same as what appears on your IRB or IACUC application.*

INITIAL BUDGET PERIOD		PROJECT PERIOD		UNIVERSITY COMMITMENT
From:	To:	From:	To:	
08/01/00	07/31/01	08/01/00	07/31/03	Tuition: Graduate Assistant stipends/salaries are requested. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No. If yes, tuition and fees should also be requested. If yes, and tuition/fees not requested, please explain:
Direct Costs:		Direct Costs:		
Indirect Costs:		Indirect Costs:		
Total Costs:		Total Costs:		Additional Compensation/Overload? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Indirect Costs:		Indirect Costs:		Will this project generate subcontracts? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Full Federal Indirect Costs? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No. If no, state reason: Program requirement (14% maximum)		Type: <input checked="" type="checkbox"/> Research <input type="checkbox"/> Training <input type="checkbox"/> Other		
Additional Space and/or Facility Requirements for this Project? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No. If yes, please describe:				

Layman's Description: _____

FOR FEDERAL AND FEDERAL FLOW-THROUGH AWARDS ONLY:

Yes No Budget request includes salary for clerical and administrative staff, postage, local telephone service, office supplies, general purpose software, subscriptions, and/or memberships. If yes, you must include special justification in budget narrative in order to comply with federal cost accounting standards (OMB Circular A-21).

Cost-Sharing

Cost-Sharing? Yes No Required: % or Voluntary: %

First-Year Commitments:	Department	College/Area	DSR	Total
Salary & Fringe Ben.	\$	\$	\$	\$
OCO	\$	\$	\$	\$
Expense	\$	\$	\$	\$
Indirect Costs	\$	\$	\$	\$
Total	\$	\$	\$	\$

Approvals

Biohazards	Radioactive Materials	Human Subjects	Laboratory Animals
<input type="checkbox"/> Recombinant DNA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input type="checkbox"/> Infectious Agents	<input type="checkbox"/> NO COMPLIANCE	<input type="checkbox"/> Expedited	Status: _____
<input type="checkbox"/> Toxins	<input type="checkbox"/> SERVICE APPROVAL	Approval Date: _____	IACUC No.: _____
Status: _____	Status: _____	Approval Date: _____	Will data support an FDA submission? <input type="checkbox"/> Yes <input type="checkbox"/> No
Approval Date: _____	Approval Date: _____	IRB No.: _____	
Number: _____	Number: _____		

Conflict of Interest Certification

Do any participating faculty, staff, or students (or their spouses or dependent children) have any financial interest such as royalty, equity, or any other payments (e.g., consulting, salary, etc.) in the sponsor or other entities having a financial interest in intellectual property, products or services that are the subject of the proposed research? Yes No. If yes, provide a completed Financial Interest Disclosure form to your chairperson. Financial Interest Disclosure forms can be obtained from DSR or under Conflict of Interest (1-309) at <http://www.research.edu/vp/frir/po.htm>.

If yes, (1) Does/will any equity interest exceed \$10,000 in current value or exceed 1% ownership interest, or (2) do/will aggregate annual payments for royalty and other payments (e.g., consulting, salary, etc.) exceed \$10,000? Yes No

UNIVERSITY ENDORSEMENTS: The attached project has been examined by the officials whose signatures appear below. The principal academic review of the project is the responsibility of the Department (Center/Institute) and College. These signatures indicate that the signers are familiar with the project and are satisfied with and responsible for all commitments in the project as they relate to their areas (space/personnel/financial/etc).

INVESTIGATOR'S STATEMENT: My signature below certifies that 1) I am not delinquent on any federal debt; 2) I am not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from current transactions by any federal department or agency; 3) I have not and will not lobby any federal agency on behalf of this award; 4) I am aware and agree to abide by the USF Drug Free Workplace policy; 5) I am familiar with and will adhere to _____ policies, including, but not limited to, human and animal research, conflict of interest, misconduct in research, and patents and technology transfer; 6) I agree to be bound by the terms and conditions of the outside grant or contract that supports this proposed activity and, in consideration of the information and facilities made available to me by _____ or the outside sponsor, to assign copyright and patent rights to _____ in accordance with the terms and conditions stated in my employment contract.

Principal Investigator	Date	Chairperson	Date	Dean	Date
Co-Principal Investigator	Date	Chairperson	Date	Dean	Date
Co-Principal Investigator	Date	Chairperson	Date	Dean	Date
Co-Principal Investigator	Date	Chairperson	Date	Dean	Date

(For additional Co-PIs, attach an additional sheet. For employees only.)

Clinics or Affiliates:	Pharmaceutical Study:	Cancer Center:

Authorized Official	Date	Vice President, Medical Affairs	Date	Director, Research Admin.	Date
---------------------	------	---------------------------------	------	---------------------------	------

Rev. 09/28/99

Certification for Authorized Organizational Representative or Individual Applicant:

By signing and submitting this proposal, the individual applicant or the authorized official of the applicant institution is: (1) certifying that

statements made herein are true and complete to the best of his/her knowledge; and (2) agreeing to accept the obligation to comply with NSF award terms and conditions if an award is made as a result of this application. Further, the applicant is hereby providing certifications regarding debarment and suspension, drug-free workplace, and lobbying activities (see below), as set forth in Grant Proposal Guide (GPG), NSF 01-2. Willful provision of false information in this application and its supporting documents or in reports required under an ensuring award is a criminal offense (U. S. Code, Title 18, Section 1001).

In addition, if the applicant institution employs more than fifty persons, the authorized official of the applicant institution is certifying that the institution has implemented a written and enforced conflict of interest policy that is consistent with the provisions of Grant Policy Manual Section 510; that to the best of his/her knowledge, all financial disclosures required by that conflict of interest policy have been made; and that all identified conflicts of interest will have been satisfactorily managed, reduced or eliminated prior to the institution's expenditure of any funds under the award, in accordance with the institution's conflict of interest policy. Conflict which cannot be satisfactorily managed, reduced or eliminated must be disclosed to NSF.

Debarment Certification (If answer "yes", please provide explanation.)

Is the organization or its principals presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency? Yes No

Certification Regarding Lobbying

This certification is required for an award of a Federal contract, grant, or cooperative agreement exceeding \$100,000 and for an award of a Federal loan or a commitment providing for the United States to insure or guarantee a loan exceeding \$150,000.

Certification for Contracts, Grants, Loans and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report

Lobbying," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

AUTHORIZED ORGANIZATIONAL REPRESENTATIVE SIGNATURE DATE

NAME/TITLE (TYPED)

TELEPHONE NUMBER ELECTRONIC MAIL ADDRESS FAX NUMBER

*SUBMISSION OF SOCIAL SECURITY NUMBERS IS VOLUNTARY AND WILL NOT AFFECT THE ORGANIZATION'S ELIGIBILITY FOR AN AWARD. HOWEVER, THEY ARE AN INTEGRAL PART OF THE INFORMATION SYSTEM AND ASSIST IN PROCESSING THE PROPOSAL. SSN SOLICITED UNDER NSF ACT OF 1950, AS AMENDED.

Cost Sharing and Program Income



What is Cost Sharing?

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

- ✓ Cash: Monetary Support

- ✓ 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:

- ✓ verifiable.
- ✓ a specific contribution for only one federally-assisted project.
- ✓ necessary and reasonable for project objectives.
- ✓ allowable under the applicable cost principles.
- ✓ not paid by the federal government under another award, except where authorized.
- ✓ provided for in the budget (NSF's line "M").

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

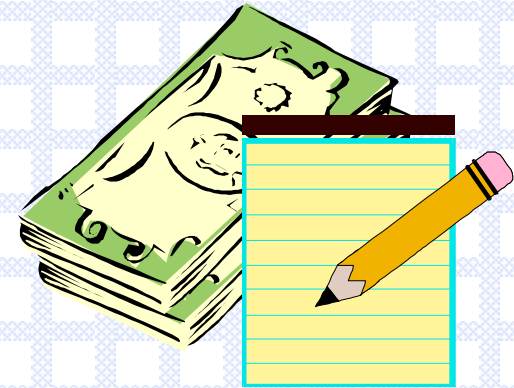
Recurrent Audit Issues in Cost Sharing

- ✓ 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

Program Income



- ◆ Program income means gross income earned by the awardee that is directly generated by a supported activity or earned as a result of the award
- ◆ Must be received or accrued during the period of the award and added to the funds committed to the project by NSF and used to further project objectives
- ◆ Conference grants have no time limit on income and income is used to offset NSF contribution

INTEGRITY STARTS WITH YOU!

If you are aware of, or suspect

- misconduct in science
 - fraud
 - waste
 - abuse

or if you just have questions,

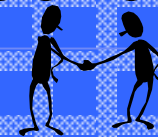
Please contact the

NSF Office of Inspector General

Suite 1135



(703) 292-7100



Anonymous Hotline 1-800-428-2189