

proposal
Disqualification
Modification of research plan and
Other remedies as appropriate.

Who are we?

Each federal agency has an independent Office of Inspector General (OIG) charged with conducting objective audits, investigations and inspections and evaluations, as well as preventing and detecting fraud, waste and abuse. Within NSF's OIG, the Office of Investigations handles allegations of wrongdoing involving organizations or individuals that receive awards from, conduct business with, or work for NSF.

What do we do?

OIG investigators examine allegations in which NSF is the potential victim of fraud by employees, grantees, contractors, or others. We receive allegations from many sources, including proposal reviewers, agency employees, the OIG hotline, other OIG offices and the public. NSF regulations require that we handle all allegations of research misconduct, in addition to allegations of fraud, waste and abuse. These allegations may lead to civil or criminal investigations.

Where can you get additional COI information?

Your home institution
Professional societies
NSF's Office of General Counsel to
clarify issues at **703-292-8060**

NSF's Office of Inspector General
To report allegations via:

Internet
oig.nsf.gov

Telephone
703 292-7100

OIG Anonymous Hotline
1-800-428-2189

Fax
703 292-9158/9159

Write
National Science Foundation
Office of Inspector General
4201 Wilson Boulevard
Arlington, VA 22230

E-mail Hotline
oig@nsf.gov

Report any possible research misconduct, fraud, waste, abuse, or mismanagement associated with NSF programs and operations to our office

OIG Office of Investigations



Conflict of Interest Considerations

What is a conflict of interest?

A conflict may arise when personal or imputed interests compromise or appear to compromise one's ability to impartially perform one's duties.

Who should worry about COI?

NSF Employees and Special Government Employees

- Program Officers
- IPAs
- Experts
- Consultants
- Advisory Committee Members
- Merit Reviewers
- National Science Board Members

Research Community Members

- Principal Investigators
- Collaborators
- Students
- Proposal Reviewers
- Others participating in a project

Institutions

Each institution receiving NSF funds should establish and follow a COI policy consistent with NSF's Grant Policy Manual (GPM).

Institutions with more than 50 employees must certify that they meet the GPM.

If a COI cannot be satisfactorily managed, reduced or eliminated, it must be disclosed to NSF.

What should be reviewed?

You CANNOT determine whether your own activities or relationships create a conflict of interest. Such assessment requires objective review and evaluation either through your institution or by NSF.

Depending upon your duties, the following interests may lead to a COI:

Financial: Stock or other investments, ownership of companies, royalties

Obligations: Board membership, trusteeship, consulting or contracting arrangements, employment, professional associations

Relationships: Family, friends, mentors, collaborators, advisors

How can you avoid COI problems?

Familiarize yourself with the relevant COI policies and regulations.*

Disclose relevant conflicts to the appropriate body.

* NSF employees may review <http://www.nsf.gov/home/pubinfo/coi/manual15.htm>

Ask the appropriate officials if you think there MIGHT be an issue.

Obtain written advice

How does the OIG handle COI allegations?

OIG receives and evaluates COI allegations

OIG collects and reviews information to determine if there is substance to allegations

OIG investigates any substantive allegation

As required, OIG informs NSF, Department of Justice, Office of Government Ethics and/or awarded institution

OIG works with NSF, Department of Justice or institution to develop adequate resolution.

What happens if a COI is found?

Allegations may lead to criminal, civil or administrative actions such as:

- Criminal prosecution
- Payment of restitution
- Corrective action (such as debarment)
- Divestiture of questioned assets
- Modification for or declination to fund