• Conduct investigations and reviews of NSF and its programs
• Promote efficiency, economy and effectiveness of NSF internal operations and programs
• Detect and prevent fraud, waste and abuse
What We Do In Investigations

- Investigate allegations of fraud, waste and abuse
- Investigate allegations of violations of federal policy and laws
- Investigate allegations of research misconduct (fabrication, falsification, plagiarism)
- Conduct outreach
- Conduct proactive reviews of targeted areas
Typical Allegations

- Research Misconduct (FFP)
- Embezzlement/Theft
- Fraud (including false statements, mail and wire fraud)
- Civil False Claims
- Criminal False Claims
- Violations of regulations and policies (conflict of interest, OMB Circulars, NSF policies)
• We investigate by interviewing individuals, reviewing documents, issuing subpoenas
• We evaluate whether allegations have substance
• We issue Reports of Investigation to NSF with conclusions and recommendations
• We also refer matters to OIG’s Office of Audit, and to Department of Justice or state law enforcement authorities, as appropriate
Possible Results of Investigation

- Nothing
- Special oversight or review
- Administrative sanctions
- Suspension/Debarment/Exclusion of individual
- Suspension/Termination of Award
- Civil/Criminal Remedies
- Compliance Plan
• Manage award effectively—**know rules**, keep documentation, have good accounting practices
• Notify OIG of allegations of wrongdoing, and significant administrative or financial problems affecting the award
• Respond to OIG’s requests for information
• Take appropriate remedial action if a problem is identified
• Communicate with your program officer
Knowing the Rules

- The Solicitation lists items NSF funds **may not** be used for, including:
  - Routine teaching activities
  - Laboratory upgrades (supplies and computers)
  - Vehicles, general utility items such as office equipment
  - Service contracts
  - Modification, construction or furnishing of laboratory or other buildings
  - Unreasonable/excessive travel costs

- You will be held accountable for what is in the Solicitation (and award letter, grant conditions, etc.)

- OIG may investigate you if you break the rules
Case Study

- University received two NSF grants
  - Approved budget included 6 pieces of engineering equipment
- PI purchased high-end digital photography equipment, including numerous lenses and a poster printer
- OIG investigation:
  - Interviewed Department Chair and Sponsored Programs staff, as well as NSF Program staff
  - Obtained and reviewed records from university and other sources
Case Study

• Results of investigation:
  ◦ NSF terminated PI’s active NSF grants
  ◦ Referral to OIG Office of Audit
  ◦ NSF suspended the PI government-wide
  ◦ Referred matter to Department of Justice
    • PI was convicted of theft
  ◦ NSF debarred the PI government-wide for 7 years
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