OIG Recommends NSF Improve Information Provided to Determine Conflicts of Interests

OIG regularly receives allegations of conflict of interests (COI) violations regarding NSF's merit review process. In the course of resolving recent complaints, we noticed an inconsistency in how NSF handles COI disclosures for *ad hoc* (i.e., remote) reviewers and COI disclosures for panelists (on-site reviews). Panelists are given a COI briefing before discussing proposals. In addition, panelists are given a form which provides examples of what may constitute a COI and asks them to review the list of potentially conflicting affiliations and relationships and to certify that they have none.

In contrast, *ad hoc* reviewers are asked within FastLane, to describe any affiliation or financial connection they may have with the particular proposal. There is no guidance or examples provided in FastLane for the *ad hoc* reviewer as to what may constitute a potential affiliation or financial COI. This lack of information for *ad hoc* reviewers creates a situation in which NSF may not be informed of potential COIs that would taint NSF's merit review. The National Institutes of Health's (NIH's) proposal review process provides both panelists and ad hoc reviewers with a form that details COI concerns and provides examples of potential COIs.

We recommended that NSF: (1) make minor changes to its COI form by (i) including in the certification language that reviewers have disclosed all COIs and (ii) incorporating a legal warning about the consequences of violating the certification; (2) incorporate more helpful information for *ad hoc* reviewers, and provide an improved form in FastLane that requires *ad hoc* reviewers to check a box indicating their certification before having access to proposals; and (3) better inform its community and its program officials about COIs by creating a COI FAQ web page and creating web-based tutorials for both PIs and NSF program officials. After receiving an extension, NSF provided its response to our recommendations after the end of the semiannual period. We will discuss it in the next Semiannual Report.