



National Science Foundation • Office of Inspector General
2415 Eisenhower Avenue, Alexandria, Virginia 22314

MEMORANDUM

DATE: June 12, 2023

TO: Suzanne H. Plimpton
Reports Clearance Officer

FROM: Mark Bell
Assistant Inspector General
Office of Audits

MARK BELL

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MARK BELL
Date: 2023.06.09
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Jennifer Springmann
Acting Assistant Inspector General
Office of Investigations

**JENNIFER A
SPRINGMANN**

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SPRINGMANN
Date: 2023.06.09 14:05:31 -04'00'

SUBJECT: Office of Inspector General Comments on the Draft *Proposal and Award Policies and Procedures Guide, NSF 24-1*

Attached are the consolidated comments of the National Science Foundation Office of Inspector General on the draft *Proposal and Award Policies and Procedures Guide* (PAPPG), NSF 24-1. Overall, we are happy with NSF's continued commitment to proper grant oversight and we hope you find our comments and suggestions useful.

If you have any questions or wish to discuss, please contact Ken Lish, Director, Contract Grant Audits, at 303-844-4738.

Attachment

Comment #	Section / Page Number	Language in PAPPG/Observations	Comments and Suggestions
1	Introduction, A, par 3 pg. viii, (pdf 10/196)	...science, technology, education, and mathematics (STEM)....	STEM typically refers to <i>Science, Technology, Engineering and Mathematics</i> .
2	Introduction, A, par 3 pg. viii, (pdf 10/196)	The additional DEIA text that encourages participation from groups underrepresented in STEM	We suggest adding language to better clarify whether this section refers to NSF's efforts to broaden participation internally, externally, or both.
3	Chapter II, B.1 & B.2 pg. II-2 (pdf 37/196)	NSF Disclosure Requirements	We suggest additional language could be added to clarify whether initial disclosures should be submitted through sciENcv. Perhaps this could be accomplished by including a footnote that refers to the Proposal Contents section within Chapter II that describes the explicit use of sciENcv for multiple disclosure documents. Providing this information in both sections will help ensure recipients appropriately comply with the new requirements.
4	Chapter II, D, h,(i) pg. II-26 (pdf 60/196)	Each product must include full citation information including: • names of authors; • product title;	We suggest that additional language should be added to the “Biographical Sketches” section to make this section parallel to the “References Cited” section (pg II-14) where the PAPPG states “Each reference must include the names of all authors (<u>in the same sequence in which they appear in the publication</u> [Emphasis Added]), the article and journal title...” We have had a case in the past where a PI manipulated the order of authorship in the Biographical Sketches section multiple times to make their contribution appear larger than it was.

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5	Chapter II, D, i, (iv) pg. II-34 (pdf 69/196)	Federal Environmental Statutes	We suggest that the PAPPG should also mention the Marine Mammal Protection Act 16 U.S.C. 1361 as a significant Federal Statute affecting research compliance for which the agency has numerous authorizations for geological survey projects on NSF vessels.
6	Chapter II, 10 pg. II-43 (pdf 78/196)	<ul style="list-style-type: none"> the participation of Tribal citizens in research as collaborators/consultants/subject matter experts pertinent to a specific Tribal Nation; the participation of Tribal citizens as human subjects in a study (note that this type of proposal may also require a separate Tribal IRB) 	We suggest NSF consider instead specifying “known Tribal citizens.” Or consider adding guidance about specific verbiage that could be included in surveys or educational research to elicit tribal citizenship disclosure by collaborators/consultants/SMs or survey participants. Does this section require tribal nation permission in order for a tribal citizen to be able to participate in any NSF-funded educational or research opportunity (e.g. research assessing different methods of teaching math)?
7	Chapter XI, A.1.g, pgs. XI-2 – XI-3 (pdf pgs. 165-166/196)	NSF Policy on Sexual Harassment, Other Forms of Harassment, or Sexual Assault	We suggest that NSF expand its policy to require notification from awardee institutions for allegations/complaints against PIs/co-PIs. This type of notification should not be considered a presumption of guilt nor would it trigger a direct actionable response from NSF. Rather, this knowledge would simply make NSF aware of potential issues to follow-up on when working with specific PIs & Co-PIs in the future. For example, this information could prompt NSF to follow-up with an institution on the status of an allegation if

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			the individual in question is being considered as a PI or Co-PI for a new award. This policy would be one step further for NSF in maintaining the integrity of the US Research Enterprise and ensuring safe and harassment-free workplaces while at the same time still allowing for institutional due process to play out.
8	Chapter XII, C, 1 pg. XII-4 (pdf 194-196)	Research Misconduct: NSF Policies and Responsibilities	We suggest considering a footnote, embedded link, cross-reference to, or incorporation by reference thereof to the QCR method of assessing plagiarism (Quotation, Citation, and Reference), found here: https://oig.nsf.gov/sites/default/files/document/2022-10/QCR.pdf .
9	Chapter XII, C, 3 pg. XII-6 (pdf 196/196)	Reporting Possible Misconduct	<p>We suggest NSF consider including an email address below the anonymous phone number or our new website statement.</p> <p>“For general inquiries about reporting fraud, waste, and abuse: oig@nsf.gov.” <u>Or</u> “For general inquiries about reporting fraud, waste, and abuse contact NSF OIG.”</p>