

Disclosures are made in the Biographical Sketch(es) and Current and Pending Support sections of the grant proposal. The integrity of this information is essential to assessing qualifications of the Principal Investigator (PI) and is used in selecting the merit review panel.

1. The Biographical Sketch is used to assess how well qualified the individual, team, or organization is to conduct the proposed activities.
2. The Current and Pending Support Information is used to assess the capacity of the individual to carry out the research as proposed, as well as to help assess any potential overlap/duplication with the project being proposed.
3. Collaborators and other affiliations are listed in a separate, single copy document included as part of the proposal submission packet.

Conflicts of Interest and Conflicts of Commitment

The other main category of foreign interference is with conflicts of interest and conflicts of commitment. NSF defines a "conflict of interest" as a situation in which an individual who is responsible for the design, conduct, or reporting of research or educational activities funded or proposed for funding by NSF (or the individual's spouse or dependent children) has a significant financial interest or financial relationship that would reasonably appear to be affected by the proposed research or educational activity.

Organizations define a "conflict of commitment" as a situation in which an individual accepts or incurs conflicting obligations between or among multiple employers or other entities. Many organizations have policies that view conflicts of commitment as conflicting commitments of time and effort, including obligations to dedicate time in excess of organizational or funding agency policies or commitments. Other types of conflicting obligations, including obligations to improperly share information with, or withhold information from, an organization/employer, can also threaten research security and integrity, and are an element of a broader concept of conflicts of commitment. Note, NSF treats t

its investigations, particularly for cases related to foreign funding

CASE STUDY 1: Failure to Respond to an OIG Subpoena related to Foreign Funding and Affiliations

- An NSF-funded PI is employed by a U.S. organization.
- NSF OIG receives information, including at least egD e rmuca reh OIG2-

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- Evidence is presented at trial indicating that grant funds obtained would be used for research the professor/founder knew had already been done in overseas. The professor/founder intended to use the grant funds for other company projects rather than for the projects for which the funds were requested. To obstruct the investigation, the professor/founder submitted falsified timesheets to government investigators.
- Information becomes available at trial that the professor/founder is a foreign talent plan participant, including the talent plan contract.
- DOJ prosecution results in criminal conviction of the professor/founder of one count of conspiracy to defraud the United States, three counts of making false statements, and one count of obstruction by falsification.
- Based on a recommendation by the OIG after the professor/founder's conviction, NSF imposes government-wide debarment and reviewer bar on the professor/founder and related company for a fixed period.

Outcome: During a multi-year investigation, NSF took several administrative actions, well before filings in Federal court, based on recommendations by the OIG, encompassing award suspensions, terminations, withholding final payment/reduction of an award amount, and government-wide suspensions. These actions were appropriately tailored to mitigate risk to NSF. The investigation resulted in a criminal conviction. Thereafter, on the OIG's recommendation, NSF imposed a government-wide debarment in view of the risk to NSF and the professor/founder's lack of present responsibility.

Conclusion

NSF's research security initiatives seek to:

- Coordinate with U.S. government interagency partners
- Communicate and build awareness with the scientific community
- Share knowledge and best practices
- Improve transparency and clarification for disclosure
- Mitigate risk through assessment and analysis to better understand the scale and scope