



NATIONAL SCIENCE FOUNDATION  
OFFICE OF INSPECTOR GENERAL  
OFFICE OF INVESTIGATIONS

## CLOSEOUT MEMORANDUM

Case Number: I-18-0085-O

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This case was opened in response to a False Claims Act (FCA) Qui Tam. The Complaint alleged FCA violations against a prime awardee and two subawardees. The Complaint alleged systematic fraud by the two subawardees from 2009 to the present for seeking and obtaining reimbursement for equipment that was never purchased or used, facility charges that were never incurred, for labor and personnel costs that were never incurred, and for maintaining unaccountable contingency funds that were converted to non-award use, all in relation to an NSF award. The Complaint further alleged that the prime awardee was fully aware of the fraud and had helped conceal it from NSF.

We investigated the allegations so that the Department of Justice could decide whether to intervene in the FCA Complaint. We interviewed the relator who filed the FCA claim. The relator served as the prime awardee's Contracting Officer's Technical Representative and the Operations Manager for the NSF award at issue. We interviewed the NSF personnel who oversaw the award, including two program officers and the award's grants and agreements specialist. We also subpoenaed and reviewed supporting financial documentation from the two subawardees.

Most allegations in the Complaint were unsubstantiated during our investigation, and others were not FCA violations but programmatic concerns of which NSF was already aware. Based on these findings, the Department of Justice did not intervene in the case.

Accordingly, this investigation is closed.