

CLOSEOUT - M90040019

The attached letter dated April 29, 1992, to [REDACTED]  
from Dr. James J. Zwolenik constitutes closeout of this case.

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NATIONAL SCIENCE FOUNDATION  
1800 G STREET, N.W.  
WASHINGTON, D.C. 20550



OFFICE OF  
INSPECTOR GENERAL

APR 29 1992

Personal and Confidential

Certified Mail

[REDACTED]

Dear [REDACTED]

This is in response to your letter of April 9, 1990, in which you made a formal complaint concerning the evaluation of a proposal [REDACTED] you submitted in [REDACTED] to the [then] NSF Division [REDACTED] for a [REDACTED] Grant. Specifically, your complaint is that your proposal was "declined" by the NSF Program Officer, [REDACTED], before he had the benefit of another NSF internal review. Your complaint is based on the fact that the NSF Form 1036 "Action Processing Form" pertaining to your proposal indicates a recommended declination by [REDACTED] dated [REDACTED] while another internal review of your proposal is dated [REDACTED]. We concede that the appearance of these facts in isolation could suggest an irregular handling of this proposal. However, [REDACTED] recommendation was not determinative as you will see from what follows.

**Background**

[REDACTED] Grants are exempt from external peer review. The [REDACTED] grant is a component that was added to the [REDACTED] Program as a mechanism for increasing the number of quality proposals [REDACTED]. It is intended to provide opportunities for new researchers to do the detailed planning that is necessary to prepare a competitive research proposal for subsequent submission to the Foundation. The actual merit of the research is not evaluated in the planning grant. The NSF requirements for review of planning grants involve internal evaluation by [REDACTED] staff and by other NSF program officers in the research directorates, as appropriate.

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## Results

We found in our review that [REDACTED] was helpful to you when he suggested you amend the planning grant proposal you initially submitted because it omitted key information explicitly required in the proposal preparation section of the [REDACTED] Program Announcement. We note that [REDACTED] had no obligation to take the time to do this. Had he not, your proposal would have been returned as "inappropriate."

The NSF Form 1036 requires two signatures for completion and final action. In this case, Form 1036 was signed and dated June 16, 1989, by [REDACTED] and on November 6, 1989 by the NSF Division Director. A research program officer's internal review is dated July 18, 1989. The NSF Form 7 "Review Analysis" was written by a [REDACTED] program officer ([REDACTED] successor) and is dated October 1989. While there are many forms involved in processing proposals, NSF Form 7 is the [REDACTED] program officer's final recommendation to the cognizant approving official, in this case the division director. The declination was approved by the [REDACTED] Division Director on November 6, 1989. Thus, the successor NSF program officer recommended that your proposal be declined in October 1989, having taken into account all internal reviews, and the [REDACTED] Division Director, who had final authority, made a final decision for declination on November 6, 1989. Final action on your proposal occurred on November 6th.

[REDACTED] left NSF [REDACTED] [REDACTED] Thus, it is not possible to explain for certain why he signed the Form 1036 a month prior to the date on the research program officer's second internal review. From the date on Form 1036, we have concluded that [REDACTED] clearly recommended declination for your proposal. Whether this recommendation was his alone in anticipation of his leaving NSF or whether he had oral input from the program officer in the relevant research area is uncertain. What is certain is that NSF's required second-level of approval by the division director for final action did not come until November 6, 1989. That approval had the benefit of all reviews. Having reviewed the whole process as summarized above, we found that NSF's final declination action complied with established procedures for final proposal actions. The required internal review occurred and was documented. [REDACTED] June 16, 1989 recommended declination stands. [REDACTED] recommendation was not accepted by his division director until the required review took place. It is incorrect to say your proposal was declined before review was complete. The division director's supervisory action assured that final action was based on the required reviews. Thus, upon thorough examination of this matter we have determined that overall your proposal was handled properly by NSF. We have now closed this matter.

By this response, we are also acknowledging your letters to this office of (1) December 6, 1991, regarding lead times for application to the [REDACTED] and (2) February 23, 1992, regarding regulations that apply to NSF officers. Neither of these issues is within the jurisdiction of this Office. You should address your concerns directly to the cognizant NSF program office and to the NSF Office of Information and Resource Management, respectively.

Sincerely,

*James J. Zwolenik*

James J. Zwolenik, Ph.D.  
Assistant Inspector General  
for Oversight