



NATIONAL SCIENCE FOUNDATION  
OFFICE OF INSPECTOR GENERAL  
OFFICE OF INVESTIGATIONS

## CLOSEOUT MEMORANDUM

Case Number: I-20-0044-O

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We conducted a joint investigation with another agency's OIG into an allegation that a grantee and PI failed to disclose a collaboration with a foreign institution and failed to disclose foreign support to the PI. The U.S. Attorney's Office opened a case to pursue a civil claim against the institution.

We interviewed the institution's staff and confirmed that the grantee and PI had a partially executed research collaboration agreement (RCA) with a foreign institution. The foreign institution has signed the RCA and the grantee allowed the collaboration to go forward but chose not to sign the RCA. We also learned through review of documents provided by the grantee that the PI had agreed to participate in a foreign talent program. When interviewed as part of the investigation, the PI stated that upon learning more about the talent program, he declined to participate. We did not discover any additional evidence

The investigation found that the proposals were submitted to and awarded by NSF and the other agency prior to the existence of the RCA. However, although the work conducted under the RCA was not related to the NSF award, the investigation determined that the RCA did cover research being conducted under the other agency's award and that the foreign institution substantively contributed to the award and the institution failed to disclose its involvement to the other agency. The investigation did not substantiate the PI's participation in the foreign talent program.

The institution agreed to pay more than \$1 million to resolve allegations that it violated the False Claims Act by failing to disclose a foreign component of the other agency's award and by failing to disclose foreign research support for the PI and another researcher who served as a principal investigator on another of the agency's awards. As there were no alleged False Claims Act violations in the submissions related to the NSF award, the settlement did not include NSF funding.

This case is **closed** with no further action taken.