



NATIONAL SCIENCE FOUNDATION  
OFFICE OF INSPECTOR GENERAL  
OFFICE OF INVESTIGATIONS

## CLOSEOUT MEMORANDUM

Case Number: I-20-0001-MA

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Between fiscal year 2018 – 2020, we provided Management Advisories to NSF based on issues identified during the course of our investigations. Listed below were recommendations that were made to the agency:

- December 13, 2017 – A suggestion that NSF update the Conflict of Interest and Standards of Ethical Conduct Manual or include a conflict-of-interest clause to clarify discrepancies between Federal law and the manual.
- January 3, 2018 – A suggestion of proactive training of I-Corps awardees on the requirements of SBIR/STTR PI requirements.
- January 3, 2018 – A suggestion to include a marker on SBIR/STTR Cover Page to indicate whether the applicant company is an I-Corps graduate.
- November 1, 2019 – A suggestion that NSF consider additional policies regarding whether a PI or Co-PI can remain in an adjunct position at an awardee institution when he/she takes a full-time position elsewhere.
- April 3, 2020 – A suggestion that NSF consider revising the language of the question related to cost principles in the Financial Management Systems Questionnaire (FMSQ) to include an explicit reference to Federal Acquisition Regulation Part 31 for for-profit entities in addition to referencing 2 CFR §200, Subpart E – Cost Principles for other types of grantees.

This case is closed with no further action taken.