

# Audit of NSF's Evaluation and Assessment Capability Section's Use and Oversight of Contracts

NATIONAL SCIENCE FOUNDATION  
OFFICE OF INSPECTOR GENERAL

March 23, 2020  
OIG 20-2-005





## AT A GLANCE

### Audit of NSF's Evaluation and Assessment Capability Section's Use and Oversight of Contracts

Report No. OIG 20-2-005  
March 23, 2020

#### WHY WE DID THIS AUDIT

NSF uses evaluations, among other methods, to inform its strategic planning, assess progress on strategic objectives, and examine program effectiveness. In 2014, NSF established the Evaluation and Assessment Capability (EAC) Section, which assists directorates and program offices commissioning external evaluations of programs and investments. We conducted this audit to determine whether (1) NSF follows Federal and NSF contracting policies and procedures for its evaluation contracts and (2) NSF uses EAC's contracted evaluations for policy decision-making and planning.

#### WHAT WE FOUND

EAC generally followed Federal and NSF contracting policies and procedures for the contracts in our audit sample; however, it could improve the planning of its contracted evaluations. Specifically, NSF may have opportunities to use strategic sourcing and firm-fixed-price contracts for its evaluation contracts. Further, although some EAC evaluations resulted in positive change, NSF has not always used evaluation results to inform decision-making and strategic planning nor ensured the results were publicly disseminated. In addition, evaluations were not always completed timely, in part due to program office delays in reviewing key contract deliverables. At the time of our audit, NSF also did not have an agency-wide evaluation plan to help focus evaluation resources on high priority issues, but it designated a senior official responsible for the plan's development. EAC has an opportunity to further develop policies and procedures to guide planning and communication between EAC and program offices.

#### WHAT WE RECOMMEND

We made four recommendations that, if implemented, should enhance EAC's policies and procedures for evaluations and NSF's evidence-based planning and policymaking.

#### AGENCY RESPONSE

NSF agreed with our recommendations. NSF's response is included in its entirety in Appendix A.

FOR FURTHER INFORMATION, CONTACT US AT [OIGPUBLICAFFAIRS@NSF.GOV](mailto:OIGPUBLICAFFAIRS@NSF.GOV).



**National Science Foundation • Office of Inspector General**  
2415 Eisenhower Avenue, Alexandria, Virginia 22314

**MEMORANDUM**

**DATE:** March 23, 2020

**TO:** Fleming Crim  
Chief Operating Officer

Suzanne Iacono  
Office Head  
Office of Integrative Activities

**FROM:** Mark Bell [REDACTED]  
Assistant Inspector General  
Office of Audits

**SUBJECT:** Audit Report No. 20-2-005, *Audit of NSF's Evaluation and Assessment Capability Section's Use and Oversight of Contracts*

Attached is the final report on the subject audit. We have included NSF's response to the draft report as an appendix.

This report contains four recommendations aimed at enhancing NSF's evidence-based planning and policymaking and the Evaluation and Assessment Capability Section's policies and procedures. NSF concurred with all of our recommendations. In accordance with Office of Management and Budget Circular A-50, *Audit Followup*, please provide a written corrective action plan to address the report recommendations. In addressing the report's recommendations, this corrective action plan should detail specific actions and associated milestone dates. Please provide the action plan within 60 calendar days.

We appreciate the courtesies and assistance NSF staff provided during the audit. If you have questions, please contact Elizabeth Kearns, Director of Audit Execution, at 703.292.7100 or [oigpublicaffairs@nsf.gov](mailto:oigpublicaffairs@nsf.gov).

cc: Christina Sarris      Keith Boyea      Elizabeth Kearns  
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# ABBREVIATIONS

COR	Contracting Officer’s Representative
DACS	Division of Acquisition and Cooperative Support
EAC	Evaluation and Assessment Capability
OMB	Office of Management and Budget
SOW	Statement of Work



## Background

The National Science Foundation is an independent Federal agency created by Congress in 1950 “to promote the progress of science; to advance the national health, prosperity, and welfare; to secure the national defense....” NSF uses evaluations,<sup>1</sup> among other methods, to inform its strategic planning, assess progress on strategic objectives, and examine program effectiveness.

In 2014, NSF established the Evaluation and Assessment Capability (EAC) Section within its Office of Integrative Activities. EAC assists directorates and program offices commissioning external evaluations of programs and investments. It also conducts its own evaluations of NSF programs and helps oversee evaluation contracts. EAC provides centralized support and resources for data collection, analytics, and the design of evaluation studies and surveys. These activities are intended to enable NSF to more consistently evaluate the impacts of its investments, to make more data-driven decisions, and to establish a culture of evidence-based planning and policymaking. EAC operates with a \$3 million budget and four staff members. EAC conducts its own evaluations and works to enhance NSF capabilities for evaluation, knowledge management, and decision-making. Our audit focused on EAC’s portfolio of contracted evaluations; please see Appendix A for our objectives, scope, and methodology.

The objectives of this audit were to determine whether (1) NSF follows Federal and NSF contracting policies and procedures for its evaluation contracts and (2) NSF uses EAC’s contracted evaluations for policy decision-making and planning.

## Results of Audit

EAC generally followed Federal and NSF contracting policies and procedures for the contracts in our audit sample; however, it could improve the planning of its contracted evaluations. Specifically, NSF may have opportunities to use strategic sourcing and firm-fixed-price contracts for its evaluation contracts. Further, although some EAC evaluations resulted in positive change, NSF has not always used evaluation results to inform decision-making and strategic planning nor ensured the results were publicly disseminated. In addition, evaluations were not always completed timely, in part due to program office delays in reviewing key contract deliverables. At the time of our audit, NSF also did not have an agency-wide evaluation plan to help focus evaluation resources on high priority issues, but it designated a senior official responsible for the plan’s development. EAC has an opportunity to further develop policies and procedures to guide planning and communication between EAC and program offices.

### NSF May Have Opportunities to Improve Contracting for Evaluations

For our audit sample, we judgmentally selected 4 of 12 of EAC’s complete and ongoing evaluation contracts; see Table 1. As this is a judgmental sample, we cannot project our findings across the total population of EAC’s evaluation contracts.

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<sup>1</sup> The *Foundations for Evidence-Based Policymaking Act of 2018* (Pub. L. No. 115-435) defines an evaluation as “an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency.”





**Table 1. Judgmentally Selected Evaluation Contracts**

Evaluation Title	Award Effective Date	Contract Ceiling Amount	Final Amount Expended
Evaluation of the NSF’s Science, Engineering, and Education for Sustainability Portfolio of Programs	4/3/2014	\$1,750,259	\$1,502,867
Evaluation of the Innovation Corps Teams Program	9/24/2015	\$1,128,409	\$1,298,556*
Evaluation of the NSF Inclusion across the Nation of Communities of Learners of Underrepresented Discoverers in Engineering and Science Program	9/26/2016	\$3,425,426	\$3,420,719**
Evaluation of the NSF Geoscience Education and Diversity Portfolio	9/18/2017	\$626,282	\$625,213**

*Source:* NSF OIG-generated based on evaluation contract information.

\*NSF increased the contract ceiling amount by about \$170,000 to complete the task identified due to NSF delays.

\*\*NSF should close these contracts within 20 months from receipt of the final deliverable. As a result, this amount may increase.

EAC and the Division of Acquisition and Cooperative Support (DACS) generally followed Federal and agency regulations when awarding the four contracts in our sample and managed these contracts as required. DACS also ensured the contracting officer’s representatives (COR) assigned to the evaluation contracts were properly trained and certified. However, EAC may have opportunities to strategically source its contracts and negotiate firm-fixed-price or hybrid contracts where appropriate.

### **EAC May Have Opportunities to Strategically Source its Contracts**

According to NSF’s Acquisition Manual, NSF must use “collaborative strategic sourcing plans and implementation strategies for sourcing goods and services more effectively” and to “achieve improvements in price, performance, total cost of ownership, and overall business efficiency....” In addition, one of the President’s Management Agenda 2018 goals is to increase the Government’s strategic buying of goods and services.<sup>2</sup>

Contracting officers did not use strategic sourcing for the four contracts in our audit sample because of the unique nature of the requirements. However, a senior DACS official said DACS may be able to design a strategic sourcing plan that would allow NSF to procure evaluation services for multiple evaluations if EAC provided their requirements for several evaluations at once. Better communication with DACS regarding ongoing evaluation needs could help ensure EAC does not miss the opportunity to develop a strategic sourcing plan with DACS. For example, NSF may be able to realize cost savings by procuring evaluation services for multiple program offices through a Blanket Purchase Agreement, which can be used to fill repetitive needs for supplies or services.

<sup>2</sup> “meaning that they share in contracts... [that provide savings] for taxpayers, in order to buy common goods and services as an enterprise.”



## EAC May Have Opportunities to Use Firm-Fixed-Price Contracts

Of EAC's 12 contracted evaluations, 11 used time-and-materials contracts and one used a hybrid of firm-fixed-price for the first half of the contract and time-and-materials for the second half. A time-and-materials contract "provides for acquiring supplies or services" based on "[d]irect labor hours at specified fixed hourly rates that include wages, overhead, general and administrative expenses, and profit" and the "[a]ctual cost for materials[.]"<sup>3</sup> As the *Federal Acquisition Regulation* explains, such a contract "may be used only when" an agency cannot clearly define its needs.<sup>4</sup> NSF's *Acquisition Manual* moreover, deems time-and-materials contracts as "high risk" or "medium risk" — meaning that there is a "strong" or at least "some likelihood that the technical, cost and/or schedule risk(s) to NSF over the life of the acquisition could result in a negative impact on the NSF mission."<sup>5</sup> By contrast, a firm-fixed-price contract "provides maximum incentive for the contractor to control costs and perform effectively...."<sup>6</sup> An agency can also combine contract types if firm-fixed-price cannot be used for the entire contract.<sup>7</sup>

A former EAC official and a current DACS official we interviewed both said that NSF may be able to use a firm fixed-price contract for part, or all, of the contract if EAC clearly defines its needs. However, DACS staff told us that EAC and the program offices do not invest enough time during the planning phase to develop Statements of Work (SOW) that would allow them to use firm-fixed-price contracts. Better coordination with the program offices and DACS to develop detailed SOWs could allow NSF to take advantage of firm-fixed-price or hybrid contracts if appropriate.

## NSF Used Some EAC Evaluations to Drive Positive Change But Has Not Always Used Evaluation Results

NSF has used evaluation results to drive positive change when EAC coordinated with the program offices and ensured the evaluation was well planned. For example, program staff reported using the two most recent evaluations in our sample — which EAC helped design and manage in their entirety — more than the prior two evaluations, which NSF initiated before fully staffing EAC. Additionally, for one of the more recent contracted evaluations, EAC and the program office were involved in annual summary report review meetings and discussions on how they could use and implement the evaluation results. In this instance, the program office said the evaluation helped to bring positive change to the program and had an impact on program outcomes.

However, EAC has not always ensured NSF uses evaluation results to inform decision-making and strategic planning or to assess the performance of NSF processes and programs. For one evaluation in our sample, EAC did not have additional plans beyond the contractor's final presentation to help the program office apply the evaluation results. EAC noted the evaluation had taken a long time to execute and the program office experienced high staff turnover, which negatively impacted evaluation support.

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<sup>3</sup> 48 CFR § 16.601(b)

<sup>4</sup> 48 CFR § 16.601(c)

<sup>5</sup> NSF's *Acquisition Manual*, Subpart 2542.302-70(d)(2), (3)

<sup>6</sup> 48 CFR § 16.202-1

<sup>7</sup> 48 CFR § 16.104(e)



Program office staff told us the timing of the final evaluation report did not align with program decisions or next steps and could not be used because the program had changed during the time taken to complete the evaluation.

## Evaluations Were Not Always Completed Timely

According to NSF’s Evaluation Principles, dated August 2016, “[e]valuations and assessments are deemed relevant when they produce practical, timely, and actionable evidence.” We found that for each of the four contracts in our sample, NSF did not receive the final evaluation report by the due date originally established in the SOW, which details contract requirements. The most significant delay — 27 months — resulted in a contract cost increase of more than \$170,000; see Table 2.

**Table 2. Evaluation Contract Delays**

Evaluation Title	Award Effective Date	Final Report Due Date	Final Report Received Date	Delay of Final Report	Cost of Delay
Evaluation of the NSF’s Science, Engineering, and Education for Sustainability Portfolio of Programs	4/3/2014	4/3/2017	8/24/2018	17 months	\$0
Evaluation of the Innovation Corps Teams Program	9/24/2015	3/24/2017	6/28/2019	27 months	\$170,147
Evaluation of the NSF Inclusion across the Nation of Communities of Learners of Underrepresented Discoverers in Engineering and Science Program	9/26/2016	9/23/2019	11/21/2019	2 months	\$0*
Evaluation of the NSF Geoscience Education and Diversity Portfolio	9/18/2017	2/28/2018	8/27/2018	6 months	\$0*

Source: NSF OIG-generated based on evaluation contract information.

\*NSF should close these contracts within 20 months from receipt of the final deliverable. As a result, this amount may increase.

The contracted evaluation planning process has many steps, which may include identifying the evaluation need, drafting a SOW, procuring evaluation services, developing the evaluation plan, and obtaining approval from the Office of Management and Budget (OMB) to conduct surveys. EAC acknowledged contractors have needed more time to complete the planning phase than EAC projected and to which the contractor agreed. We found one contractor took 6 months longer than expected to draft the evaluation plan and another took 5 months longer than expected to submit a final evaluation plan. EAC extended contracts in our sample due to NSF-caused delays, including program offices being slow to review contractor deliverables.

In some cases, these delays also contributed to delays in receiving OMB approval. Under the *Paperwork Reduction Act of 1995* (PRA),<sup>8</sup> Federal agencies must obtain OMB clearance to survey (using identical questions) 10 or more non-Federal individuals or entities, and OMB can take up to 60 days to approve

<sup>8</sup> Pub. L. No. 104-13, codified at 44 U.S.C. 3501 *et seq.*





survey requests.<sup>9</sup> Three of the four contracts in our sample required PRA approval from OMB. For two of these contracts, NSF delays in providing feedback on deliverables resulted in delays in obtaining OMB approval and NSF extending the periods of performance. In one instance, OMB approval was delayed nearly 2 years as NSF redesigned the original study, conducted exploratory testing, restarted the PRA clearance process, and did not review and finalize the contractor's OMB package in a timely manner.

## **NSF Has Not Shared All Evaluation Results**

According to NSF's Evaluation Principles, "[r]esults of evaluations will be made public, unless specifically prohibited." For one evaluation contract in our sample, NSF publicly disseminated results from the annual summary reports required by the contract. However, NSF did not publicly release the results of three evaluations in our sample. NSF also does not have a central repository where it can share evaluation results internally. Consequently, NSF staff may not always be aware of previous or ongoing evaluations or be able to easily locate evaluation results. For example, a contracted evaluation was previously completed for a program office, but program staff could not find the evaluation results after a key staff member left NSF.

NSF's June 2018 *Sharing of Non-public NSF Information — Interim Guidance* allows contractors and evaluators to publish results if "(a) the scope of the data analysis and dissemination plans are articulated in the contract, which would be approved by relevant management, and (b) the draft publication has been approved for release by the cognizant [Assistant Director/Office Head] or Deputy [Assistant Director/Office Head]." EAC has not always included dissemination plans in its evaluation contracts. A former EAC official told us EAC releases information on a case-by-case basis and does not have a formal process for determining what to publish. NSF staff also told us they were open to publishing these evaluation results but faced obstacles, such as not knowing how best to release the reports on NSF's website, or not having a version of the evaluation report that can be released to the public.

## **EAC Can Further Develop Policies and Procedures**

Although EAC has some policies and procedures, it did not have sufficient policies and procedures to guide planning and communication between EAC and program offices. For example, EAC has procedures to assist program offices with establishing an evaluation strategy and SOW and provides contractors with checklists to establish evaluation standards. EAC also established evaluation principles and roles and responsibilities. However, EAC did not have an evaluation guide or handbook that would inform program offices of their evaluation process, or policies and procedures that describe how evaluation results will be used or implemented. EAC also had not established guidelines on the amount of time a program office has to complete deliverable reviews or expectations for communication between the two offices.

The U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government* discusses developing and implementing policies and procedures to assist in ensuring an

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<sup>9</sup> See 44 U.S.C. § 3507(c)(2); 5 C.F.R. § 1320.10.



agency meets its objectives. Without sufficient policies and procedures, NSF's contracted evaluations may continue to take longer and cost more to complete than expected.

## New Act Requires an Agency-wide Evaluation Plan

According to a 2013 OMB memorandum, having an “agency-wide evaluation plan developed with senior policy and program officials can focus evaluation resources on high priority issues.”<sup>10</sup> At the time of our audit, NSF did not have an agency-wide evaluation plan. Although EAC included its evaluation plan in its budget request to Congress for FYs 2014–2021, until recently, it did not have the mandate or authority to establish an evaluation policy or plan for the entire Foundation.

During our audit, the *Foundations for Evidence-Based Policymaking Act of 2018* (Pub. L. No. 115-435) was enacted on January 14, 2019, and OMB subsequently issued implementing guidance to agencies on July 10, 2019.<sup>11</sup> The Act requires, in part, that an agency designate an Evaluation Officer to establish and implement an agency-wide evaluation plan.<sup>12</sup> According to OMB's implementing guidance, each agency is required to submit an evaluation plan that covers evaluation activities planned for FY 2022, concurrent with the submission of its FY 2022 Annual Performance Plan by September 2020. Further, this concurrent submission must be repeated each year thereafter, with the annual evaluation plan being published along with the publicly disseminated annual performance plan.

In July 2019, NSF designated EAC's Section Head the agency Evaluation Officer, who is now responsible for the development of a comprehensive, agency-wide evaluation plan. This will help NSF consistently evaluate the impacts of its investments and continue to establish a culture of evidence-based planning and policymaking.

## Recommendations

We recommend the Chief Operating Officer, National Science Foundation:

1. Ensure the Evaluation Officer has the authority and resources necessary to implement applicable requirements in the *Foundations for Evidence-Based Policymaking Act of 2018*.

We recommend the Evaluation Officer, National Science Foundation:

2. Ensure NSF's implementation plan meets the requirements of the *Foundations for Evidence-Based Policymaking Act of 2018* and includes guidelines for internal and public dissemination and archiving of evaluation results.

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<sup>10</sup> OMB M-13-17, *Next Steps in the Evidence and Innovation Agenda*, July 26, 2013

<sup>11</sup> OMB M-19-23, *Phase 1 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Learning Agendas, Personnel, and Planning Guidance*

<sup>12</sup> Not all requirements of the *Foundations for Evidence-Based Policymaking Act of 2018* and its Implementation Guidance were in effect during the time of our audit; however, we aligned our recommendations with these new requirements.



3. Continue to develop policies and procedures, including:
  - a. Expectations for program offices, including timeframes for program office staff to review deliverables and respond to information requests, and timelines for review of documentation for *Paperwork Reduction Act* clearance;
  - b. Guidance for the level of support program offices will receive analyzing evaluation results and implementing recommendations; and
  - c. Guidance for the dissemination of results and implementation of recommendations.
4. Develop and implement contract planning procedures to ensure DACS and EAC fully consider the potential to use strategic sourcing and firm-fixed-price contracts.

## OIG Evaluation of Agency Response

NSF agreed with our recommendations. NSF's response is included in its entirety in Appendix A.



# NATIONAL SCIENCE FOUNDATION OFFICE OF INSPECTOR GENERAL

## Appendix A: Agency Response



National Science Foundation  
Office of the Director

### MEMORANDUM

**MAR 09 2020**

Date:

To: Mark Bell, Assistant Inspector General, Office of Audits [REDACTED]

From: F. Fleming Crim, Chief Operating Officer, NSF [REDACTED]  
Suzanne Iacono, Office Head, Office of Integrative Activities [REDACTED]

Subject: NSF Response to the OIG's Official Draft Report for its *Audit of NSF's Evaluation and Assessment Capability Section's Use and Oversight of Contracts*

NSF appreciates the opportunity to review and respond to the OIG's Official Draft Report for its *Audit of NSF's Evaluation and Assessment Capability Section's Use and Oversight of Contracts*. NSF thanks the OIG for its thoughtful, iterative process in producing this draft report, which integrates input from different stakeholders at NSF. This approach has resulted in a report with recommendations designed to bolster NSF's ongoing efforts to strengthen the Evaluation and Assessment Capability Section (EAC) in the Office of Integrative Activities (OIA) and support its important work in leading a robust Agency-wide response to the Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act). This report also comes at an opportune time, as EAC transitions from its early inception to full implementation of evaluation services.

NSF agrees with the OIG's four recommendations and will pursue several actions aligned with these recommendations. These include:

1. Continuing to socialize the requirements of, and opportunities created by, the Evidence Act to focus Agency attention on the development and coordinated implementation of an Agency-wide evaluation plan.
2. Developing new policies (such as an evaluation policy for the Agency as required by the Evidence Act) and enhancing existing policies to promote timely completion of evaluations, release of evaluation findings and data, and support for the interpretation and use of evaluation results to inform decision-making.
3. Refining EAC's FY 2020 contracting and contract administration strategies. NSF will seek to maximize the use of common contract solutions in accordance with OMB Memorandum M-19-13, including the use of solutions identified as "Best In Class" or solutions managed at the Government-wide level (e.g., Tier 3 and Tier 2 Spend Under Management designated solutions). Further, when conducting acquisition planning, EAC and the Division of Acquisition and Cooperative Support (DACS) in the Office of Budget, Finance and Award Management will seek to maximize the use of firm-fixed-

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price (FFP) contracts, where practicable. Contract type selection and administration will be thoroughly documented in the Acquisition Plan and by required determinations and findings.

On behalf of NSF staff participating in this engagement, we further acknowledge the OIG's diligence and commitment to understanding the use and oversight of contracts by EAC. We look forward to receiving the final report. If you have any concerns, please contact Clemencia Cosentino, Section Head, EAC at [ccosenti@nsf.gov](mailto:ccosenti@nsf.gov) or 703-292-4394.

cc: France Córdova, Director, NSF  
Diane Souvaine, Chair, NSB  
Anneila Sargent, Chair, Committee on Oversight, NSB





## Appendix B: Objectives, Scope, and Methodology

The objectives of this audit were to determine whether (1) NSF follows Federal and NSF contracting policies and procedures for its evaluation contracts and (2) NSF uses EAC's contracted evaluations for policy decision-making and planning.

While EAC conducts their own evaluations, we only focused on EAC's contracted evaluations to determine how evaluation contracts are planned, monitored, and closed and how evaluations are used to make decisions. During our audit, EAC's portfolio included five completed and seven ongoing evaluation contracts. We judgmentally selected four evaluation contracts for our sample and selected contracts that EAC initiated in FYs 2014 through 2017, that would be complete in FY 2019, and that had a variety of collaborating directorates. As this is a judgmental sample, we cannot project our findings across the total population of EAC's evaluation contracts.

Through research and information-gathering meetings, we identified applicable Federal requirements and reviewed a variety of resources on "best practices" related to evaluations, Federal contracting, and records management, including:

- American Evaluation Association *Guiding Principles*
- Council of the Inspectors General on Integrity and Efficiency *Checklist for Review of Monitoring of Audit Work Performed by an Independent Public Accounting Firm*
- *Federal Acquisition Regulation*
- *Handbook of Practical Program Evaluation*
- *Miron Evaluation Report Checklist*
- National Academies *Measuring the Impacts of Federal Investments in Research: A Workshop Summary*
- National Academies *Advancing Concepts and Models for Measuring Innovation: Proceedings of a Workshop*
- National Institutes of Health *Partnerships for Environmental Public Health Evaluation Metrics Manual*
- *NSF Acquisition Manual*
- *NSF Contract Closeout Procedures Desk Guide*
- *NSF Contract Type Selection Guide*
- *NSF Contracting Officer's Representative Handbook*
- *NSF Evaluation Principles*
- *NSF Strategic Plan for Fiscal Years 2018–2022*
- OMB M-13-17, *Next Steps in the Evidence and Innovation Agenda*
- OMB M-19-21, *Transition to Electronic Records*
- President's Management Agenda (2018)
- *Stufflebeam Evaluation Plans and Operations Checklist*
- *Stufflebeam Program Evaluations Metaevaluation Checklist*
- U.S. Agency for International Development *Evaluation Policy and Evaluation Toolkit*
- U.S. Department of Energy *Overview of Evaluation Methods for R&D Programs*



- U.S. General Services Administration Office of Evaluation Sciences *Better Government Through Testing and Learning Workshop*
- U.S. Government Accountability Office, GAO-12-208G, *Designing Evaluations*; and
- Urban Institute *Making Evidence Relevant to Government*.

We assessed compliance with Federal and NSF policies and procedures, as well as assessed consistency with evaluation best practices. In addition, we reviewed documentation from the contracting officer's and COR administration files. We assessed data reliability to ensure accuracy of the data used in our review. We held information-gathering meetings with staff in the Office of Integrative Activities, including in EAC, and the Office of Budget, Finance and Award Management, including DACS; we also met with program staff and CORs.

We conducted this performance audit between August 2018 and January 2020 in accordance with the *Inspector General Act of 1978*, as amended, and *Generally Accepted Government Auditing Standards*. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions, based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions.

Major contributors to this report include Elizabeth Kearns, Director, Audit Execution; Melissa Prunchak, Audit Manager; Vashti Young, Senior Management Analyst; Ashley Lippolis Aviles, Management Analyst, Elizabeth Argeris Lewis, Executive Officer and Communications Analyst; and Ruth Gonzalez, Independent Report Referencer.



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