Management Challenges for the National Science Foundation in Fiscal Year 2019

October 12, 2018

NSF

AT A GLANCE

Management Challenges for the National Science Foundation in Fiscal Year 2019

October 12, 2018

WHY WE DID THIS REPORT

The *Reports Consolidation Act of 2000* (Public Law 106-531) requires us to annually update our assessment of NSF's "… most serious management and performance challenges facing the agency … and the agency's progress in addressing those challenges."

WHAT WE FOUND

NSF leads the world as an innovative agency dedicated to advancing science. Its awards have led to many discoveries that have contributed to the country's and the world's economic growth. Beyond its scientific mission, as a Federal agency, NSF must be a responsible steward of taxpayer dollars and distribute scarce research funds properly. This year we are introducing a new design for the Management Challenges report, in which we clearly lay out each challenge, actions taken by the agency, and work left to do.

Based on NSF's significant progress, we have removed two challenge areas identified in our FY 2018 Management Challenges report: Managing the Government's Records and Cybersecurity and Information Technology Management. This year, we have identified six areas representing challenges NSF must continue to address to better accomplish its mission:

- Managing Major Multi-User Research Facilities
- Meeting *Digital Accountability and Transparency Act of 2014* (DATA Act) Reporting Requirements
- Eliminating Improper Payments
- Managing the *Intergovernmental Personnel Act* Program
- Managing the U.S. Antarctic Program
- Encouraging the Ethical Conduct of Research

We are encouraged by NSF's progress in its efforts to address critical management and performance challenges. Effective responses to these challenges will continue to position NSF to ensure the integrity of NSF-funded projects, to spend research funds in the most effective and efficient manner, and to maintain the highest level of accountability over taxpayer dollars.

AGENCY RESPONSE TO *MANAGEMENT CHALLENGES FOR FY 2018*

Following the issuance of this report, NSF will include its Management Challenges Progress Report and its response to *Management Challenges for the National Science Foundation in FY 2018* as part of its Agency Financial Report.

FOR FURTHER INFORMATION, CONTACT US AT 703.292.7100 OR OIG@NSF.GOV.

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

MEMORANDUM

DATE: October 12, 2018

TO: Dr. Diane Souvaine
Chair
National Science Board

Dr. France Córdova
Director
National Science Foundation

FROM: Allison C. Lerner
Inspector General
National Science Foundation

SUBJECT: Management Challenges for the National Science Foundation in Fiscal Year 2019

Attached for your information is our report, *Management Challenges for the National Science Foundation in Fiscal Year 2019*. The *Reports Consolidation Act of 2000* (Public Law 106-531) requires us to annually update our assessment of NSF's "… most serious management and performance challenges facing the agency … and the agency's progress in addressing those challenges." A summary of the report will be included in the National Science Foundation Agency Financial Report.

If you have questions, please contact me at 703.292.7100.

Attachment

Table of Contents

Introduction

The *Reports Consolidation Act of 2000*[1] requires us to annually update our assessment of NSF's "... most serious management and performance challenges facing the agency ... and the agency's progress in addressing those challenges." In this report, we summarize what we consider the most critical management and performance challenges to NSF, and we assess the Foundation's progress in addressing those challenges.

NSF leads the world as an innovative agency dedicated to advancing science. Its awards have led to many discoveries that have contributed to the country's and the world's economic growth. Beyond its scientific mission, as a Federal agency, NSF must be a responsible steward of taxpayer dollars and distribute scarce research funds properly.

This year we are introducing a new design for the Management Challenges report, in which we clearly lay out each challenge, actions taken by the agency, and work left to do. We hope that this new format will help our readers more quickly grasp the challenges facing the Foundation and provide a better picture of its efforts to address them.

Significant Progress in Addressing FY 2018 Challenges

This year we have removed two challenge areas identified in our FY 2018 Management Challenges report: Managing the Government's Records and Cybersecurity and Information Technology Management.

NSF has taken significant action to mitigate challenges faced in managing the Government's records. For example, NSF:

- revised records management training to cover all elements required by the U.S. National Archives and Records Administration;
- issued NSF Bulletin 18-05, *Records Management Program*, and NSF Bulletin 18-04, *Managing Records in Electronic Messages*, to identify staff responsibilities at all levels of the agency;
- updated NSF Bulletin 18-07, *Mobile Communications Devices*, to include guidance related to electronic records on NSF-issued smartphones; and
- added instructions to the agency's standard operating procedures for social media on how to capture and retain records in social media posts on NSF accounts.

These actions, along with other agency activities, have enhanced NSF's confidence that its official records are retained and protected. Additionally, according to NSF, it is on track to comply with a 2012 U.S. National Archives and Records Administration and Office of Management and Budget directive requiring agencies to manage all permanent electronic Federal records in an electronic format to the fullest extent possible by December 31, 2019.[2] The agency must remain vigilant in its management of records to comply with the directive.

NSF has also made significant progress in the area of Cybersecurity and Information Technology Management. Although cybersecurity will always remain an area with inherent risk, NSF's actions have addressed some of the highest risk areas. For example, NSF:

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[1] Pub. L. No. 106-531
[2] *Managing Government Records Directive*, Memorandum M-12-18, August 24, 2012

- established technical controls to monitor the NSF network for unauthorized access to reduce the risk of unauthorized transactions, changes to data, audit logs and configurations;
- conducted configuration scans and regular reviews of audit logs and reported results to management; and
- proactively assessed the security state of systems through NSF's IT security continuous monitoring program.

Additionally, the agency successfully mitigated all prior year *Federal Information Security Modernization Act of 2014*[3] (FISMA) findings. Based on this progress, we have removed the challenge from this year's list; however, by its nature, the cybersecurity area presents a myriad of potential and unknown risk that can never be fully anticipated and will, therefore, continue to test NSF's ability to respond and mitigate threats. In light of the ever-evolving nature of cybersecurity risks, it is quite possible that over time this area might once again prove to be a management challenge to the agency.

Challenges for FY 2019

This year, we have identified six areas representing challenges NSF must continue to address to better accomplish its mission. We have compiled this list based on our audit and investigative work; general knowledge of the agency's operations; and evaluative reports of others, including the U.S. Government Accountability Office (GAO) and NSF's various advisory committees, contractors, and staff. We identify management challenges as those that meet at least one of the following criteria:

- The issue involves an operation that is critical to an NSF core mission.[4]
- There is a risk of fraud, waste, or abuse of NSF or other Government assets.
- The issue involves strategic alliances with other agencies, the Office of Management and Budget, the Administration, Congress, or the public.
- The issue is related to key initiatives of the President.
- The issue involves a legal or regulatory requirement not being met.

The following list represents six areas of the most critical management and performance challenges for the Foundation:

- Managing Major Multi-User Research Facilities
- Meeting *Digital Accountability and Transparency Act of 2014* (DATA Act) Reporting Requirements
- Eliminating Improper Payments
- Managing the *Intergovernmental Personnel Act* (IPA) Program
- Managing the U.S. Antarctic Program
- Encouraging the Ethical Conduct of Research

We have also identified an emerging challenge area of Responding to the National Security Threat of Foreign Talent Plans. Recent Congressional hearings have focused on the theft of U.S. federally funded research and development by foreign states that use "Talent Plans" to benefit the foreign state's economic development,

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[3] Pub. L. No. 113-283

[4] The *National Science Foundation Act of 1950* (Pub. L. No. 81-507) sets forth the mission: "to promote the progress of science; to advance the national health, prosperity, and welfare; to secure the national defense; and for other purposes."

Introduction

industry, and national security by obtaining information and technology from abroad. Such Talent Plans have the potential to exploit the openness of American universities and research enterprises and present a significant threat to the integrity of U.S. research initiatives. We have just begun investigating this challenge area and have not yet fully determined the risk to NSF.

We begin this year's list with challenges faced in managing major multi-user research facilities — an inherently risky portfolio due to the complex nature of these facilities, the associated high construction and operating costs, and the need to emphasize both sound business practices and innovative science in the awarding of cooperative agreements for such facilities. Additionally, as facilities age and reach their end of life cycle, NSF must be prepared for divestment of these facilities. NSF has improved its oversight over its major facilities over the past few years, and we are encouraged by NSF's action in implementing new controls in this area.

We continue to list the United States Antarctic Program (USAP) as a challenge. According to NSF, the transition of the Antarctic Support Contract responsibilities to Leidos has occurred without disruptions in operations or unwarranted increases in cost, and management controls and operating procedures for monitoring invoice processing and systems performance are in place. However, USAP is in the planning stage of a highly complex and risky program, the Antarctic Infrastructure Modernization for Science (AIMS) Project — a $355 million endeavor that will stretch agency resources and present additional challenges for NSF to overcome.

Finally, while not designated as a challenge area, we continue to focus resources on other areas of high risk within grants administration, including the Small Business Innovation Research and Small Business Technology Transfer programs, which provide equity-free funding and entrepreneur support at the earliest stages of research.

We are encouraged by NSF's progress in its efforts to address critical management and performance challenges. Effective responses to these challenges will continue to position NSF to ensure the integrity of NSF-funded projects, to spend research funds in the most effective and efficient manner, and to maintain the highest level of accountability over taxpayer dollars.

Why is this a serious management challenge?

This challenge involves an operation that is critical to an NSF core mission. In addition, there is a risk of fraud, waste, or abuse of Government assets.

As part of its mission, NSF funds the construction, management, and operation of major multi-user research facilities (major facility), which are state-of-the art infrastructure for research and education and include telescopes, ships, distributed networks, and observatories. NSF's major facility portfolio is inherently risky due to the complex nature of these facilities and the associated high construction and operating costs. In FY 2017, NSF spent $222 million constructing major facilities and $984 million operating them.

Our past reports highlighted concerns with oversight including unsupported proposal budgets, limited controls over management fees and contingency funds, and the absence of certified or validated earned value management systems. Recent audits identified additional oversight concerns, including the need for strengthened controls to ensure major facilities clearly identify subrecipients, complete subrecipient risk assessments, and properly charge project expenditures to construction or operations. Further, a June 2018 U.S. Government Accountability Office (GAO) audit found five of seven major facilities funded under NSF's no cost overrun policy experienced costs or schedule increases since starting construction.

Over the past few years, NSF has worked diligently to address our recommendations. NSF has strengthened controls over its major facility portfolio and continues to complete additional steps to strengthen its oversight.

Completed Actions

- ☑ Revised Large Facilities Manual to codify *American Innovation and Competitiveness Act* (AICA) and other strengthened requirements.
- ☑ Named Chief Officer for Research Facilities for life cycle oversight for major facilities.
- ☑ Formed Major Facilities Working Group and Facilities Governance Board to improve oversight.
- ☑ Implemented Earned Value Management System Verification, Acceptance, and Surveillance Procedures.
- ☑ Developed and implemented procedures for holding and allocating contingency funds.
- ☑ Closed 90 percent of our recommendations related to major facilities dating back to 2012.

Ongoing Actions

- ➢ Develop and implement new policies and procedures related to management reserve, monitoring subrecipients, and proper allocation of funding to construction and operations awards.
- ➢ Develop and implement new guidance to more fully use external review panels in addressing cost and schedule.
- ➢ Revise and implement internal policies and procedures related to NSF cost analysis and independent cost estimate reviews based on AICA requirements and GAO guidance.
- ➢ Ensure oversight of full life cycle of facilities from design to divestment.
- ➢ Continue oversight of eight major facilities in construction or receiving upgrades.

Looking Ahead

As of October 2018, we are completing an audit of NSF's controls to ensure major facilities properly charge expenditures to construction or operations awards. We also plan to conduct an audit to determine if NSF has a process in place for divestment of major facilities, and we are monitoring the establishment of the National Center for Optical Infrared Astronomy.

Why is this a serious management challenge?

This challenge involves strategic alliances with other agencies, the Office of Management and Budget, the Administration, Congress, or the public.

The *Digital Accountability and Transparency Act of 2014*[5] (DATA Act) requires Federal agencies to report quarterly spending data to the public through USASpending.gov, beginning with FY 2017 second quarter data. Federal agencies must report information in accordance with Government-wide financial data standards developed and issued by the Office of Management and Budget (OMB) and the Department of the Treasury.

In April 2017, NSF successfully met the DATA Act's requirement for Federal agencies to begin submitting data to Treasury. However, our November 2017 audit of NSF's FY 2017 second quarter spending data, conducted under a contract with Kearney & Company, found that the data did not meet the OMB quality requirements. Several data elements were inaccurate, incomplete, or untimely. Some of the errors were due to NSF's reporting, while others were due to Government-wide reporting issues. As a result of our audit, NSF staff conducted a root cause analysis of its challenges, noting that many of the OIG-identified errors were Government-wide in nature and beyond NSF's control, which we also recognized in our audit report.

We resolved all recommendations from our report and are encouraged by NSF's actions to improve its DATA Act reporting.

[5] Pub. L. No. 113-101

Completed Actions

☑ Developed and implemented corrective actions to address the audit report recommendations.
☑ Conducted a root cause analysis of data reporting errors.
☑ Submitted corrections for any data errors identified in the audit.
☑ Reviewed submission process with the internal controls team and identified opportunities for improvement.
☑ Worked closely with the DATA Act Audit Collaboration Working Group and CIGIE to improve DATA Act implementation.

Ongoing Actions

➢ Participate in Government-wide working groups to develop a DATA Act Playbook to support Federal agencies' compliance and audit readiness.
➢ Develop an NSF DATA Act data quality plan that considers incremental risks to data quality in Federal spending data and identifies controls to manage such risks.
➢ Monitor changes to NSF systems to determine impact on DATA Act reporting.

Looking Ahead

An independent public accountant, under contract with us, will issue an audit report in November 2019 on the quality of NSF's FY 2019 first quarter spending data reported to USASpending.gov.

Why is this a serious management challenge?

There is a risk of fraud, waste, or abuse of NSF or other Government assets. In addition, this challenge involves an operation that is related to key initiatives of the President.

The President's Management Agenda has a priority goal of Getting Payments Right to reduce the amount of cash lost through incorrect payments. The *Improper Payments Elimination and Recovery Act of 2010*[6] (IPERA) requires agencies to periodically review and identify programs and activities that may be susceptible to significant improper payments. OMB implementing guidance requires Federal agencies to institute a systematic method of reviewing all programs and activities and identify programs susceptible to significant improper payments. OMB requires agencies to assess risk against nine factors that are likely to contribute to improper payments. NSF identified one program — Grants and Cooperative Agreements — and three activities — Contracts, Payment to Employees (including salaries), and Charge Cards — for which a risk assessment needed to be conducted.

Our last review of NSF's risk assessment for FY 2015 determined that NSF complied with IPERA but that its risk assessment process needed significant improvements to ensure that the agency thoroughly assesses and documents its risk of improper payments. We identified limitations in NSF's analysis of six of the nine risk factors. NSF submitted a corrective action plan, and we resolved all recommendations related to the FY 2015 audit. Our FY 2019 audit will determine if the new risk assessment is sufficient to close the recommendations.

We also determined that NSF met the IPERA Agency Financial Report requirement for FY 2016 and FY 2017. Because NSF's FY 2015 IPERA risk assessments found the agency was not susceptible to significant improper payments, NSF was not required to perform a risk assessment until FY 2018. We are encouraged by NSF's steps to eliminate improper payments; however, this area will remain a challenge until our next audit of improper payments is completed in FY 2019.

[6] Pub. L. No. 111-204

Completed Actions

- ☑ Developed and published guidance for improper payment risk reviews, incorporating recommendations from the audit of the FY 2015 risk assessment.
- ☑ Completed an improper payments risk assessment for FY 2018 that built on the improper payments risk reviews completed during FYs 2016 and 2017.
- ☑ Conducted advanced and baseline grant monitoring activities, including grant payment testing.

Ongoing Actions

- ➢ Continue advanced and baseline grant monitoring activities, including grant payment testing.
- ➢ Continue internal controls program activities to provide assurance that NSF controls for its payment processes are operating effectively.
- ➢ Continue to improve improper payments risk assessment and reporting compliance activities.

Looking Ahead

An independent public accountant, under contract with us, will begin an audit in FY 2019, and issue its report in May 2019, on NSF's compliance with IPERA, including its review of the quality of NSF's FY 2018 risk assessment to identify improper payments.

Managing the Intergovernmental Personnel Act Program

Why is this a serious management challenge?

This challenge involves an operation that is critical to an NSF core mission.

NSF gives scientists, engineers, and educators the opportunity to temporarily serve as NSF program directors, advisors, and senior leaders. Most of these non-permanent appointments are individuals hired under the *Intergovernmental Personnel Act*[7] (IPA), who are not Federal employees but are paid through grants and remain employees of their home institutions. Individuals hired under the IPA — hereafter referred to as IPAs — bring in fresh perspectives from across all fields of science and engineering to support NSF's mission. However, IPAs can have a heightened risk of conflicts of interest while working at NSF because most come from institutions receiving NSF grants. Also, because individuals only serve in a temporary capacity for up to 4 years, there is frequent turnover in staff at NSF, especially in senior leadership positions filled by IPAs. In addition, IPAs are not subject to Federal pay and benefits limits, and can spend up to 50 days each year on Independent Research/Development (IR/D).

NSF has continued to strengthen its management of the program. We resolved and closed all four recommendations from our 2017 audit report on IPA conflicts of interest. We are encouraged that the IPA Steering Committee — established in 2016 in response to our 2013 audit report — has developed and tracked metrics related to the use of IPAs, facilitating better oversight and a cost-sharing pilot. Specifically, the committee analyzed program costs, identified potential areas for cost savings, and pursued implementation of these approaches. For example, NSF adopted the committee's recommendation for a pilot requiring 10 percent cost-sharing by every IPA's home institution of the IPA's academic-year salary and benefits.

[7] Pub. L. No. 91-648

Completed Actions

- ☑ Clarified NSF Proposal & Award Policies & Procedures Guide requiring a substitute negotiator on proposals submitted by former NSF staff, including IPAs, for 1 year after their departure.
- ☑ Issued memoranda to NSF staff and supervisors reminding them of the importance of high ethical standards and their ethics responsibilities.
- ☑ Developed and communicated a merge process for principal investigators with multiple IDs.
- ☑ Extended cost-share pilot into FY 2018 to continue to evaluate effectiveness.
- ☑ Analyzed IPA years of service.
- ☑ Delivered report on benefits of IR/D program.

Ongoing Actions

- ➤ Complete the first IPA Program Annual Report.
- ➤ Provide data on time spent on IR/D by both permanent and rotating staff.
- ➤ Report on year two of the cost-share pilot.
- ➤ Report to Congress justifications for rotator pay exceeding the maximum SES pay.
- ➤ Implement an electronic separation clearance process to track completion of exit interviews, including separating staff acknowledgement of post-employment restrictions.
- ➤ Complete the development of an agency-wide workforce strategy for balancing use of IPA and other rotators with permanent staff.

Looking Ahead

We continue to monitor the IPA Steering Committee's progress in considering IPA Program policies, overseeing budgeting approaches, and developing and tracking IPA Program-related metrics. In FY 2019, we plan to audit NSF's IR/D program, including reviewing implementation of our 2012 audit report recommendations.

Why is this a serious management challenge?

This challenge involves an operation that is critical to an NSF core mission. In addition, there is a risk of fraud, waste, or abuse of NSF or other Government assets.

NSF, through the United States Antarctic Program (USAP), manages U.S. scientific research in Antarctica. NSF awarded the Antarctic Support Contract (ASC) for USAP logistical support to Lockheed Martin in December 2011. As a result of a merger in August 2016, Leidos Innovations Corporation (Leidos) now holds the ASC. It is NSF's largest contract, currently valued at $2.1 billion over 13 years. In such a remote and isolated environment, USAP management faces heightened challenges in areas such as 1) fiscal oversight of the ASC and its subcontractors, 2) management of inventory, 3) health and safety of researchers and contractors, and 4) modernization of facilities in the Antarctic Infrastructure Modernization for Science (AIMS) project.

NSF has prior experience managing USAP's construction projects and contractor changes, and, according to NSF, the transition to Leidos occurred without disruptions in operations or unnecessary cost increases. According to NSF, it has used management controls and operating procedures for monitoring invoice processing and systems performance. However, NSF's frequent turnover of the contracting officer for ASC may pose challenges to consistent fiscal oversight of this complex project.

USAP is also entering a highly complex and risky program with AIMS — a $355 million endeavor that will stretch agency resources and may present additional challenges for NSF to overcome. The inherent risk of ASC's size, the Antarctic environment, and the upcoming AIMS project require continued vigilance.

Completed Actions

- ☑ Obtained incurred costs audits both of the contractor for ASC and the ASC's largest subcontractor for FYs 2012 and 2013.
- ☑ Assessed ASC performance annually to identify cargo failures and contractor response.
- ☑ Obtained a law enforcement site visit.
- ☑ Reviewed the legality of requiring breathalyzer testing for USAP participants.
- ☑ Conducted root cause analyses in response to FY 2017 challenges, followed by process improvements.
- ☑ Updated long-range capital plan to include lifecycle and real property investments.

Ongoing Actions

- ➢ Obtain incurred costs audits of the ASC, including an agreed-upon audit of Leidos' incurred costs for ASC from August 2016- December 2016.
- ➢ Select a pharmacy management software system.
- ➢ Conduct AIMS Final Design Review.
- ➢ Engage scientific community in efforts to minimize potential disruption of AIMS planning and construction on Antarctic science.
- ➢ Evaluate an automated process to review invoices and identify inaccuracies.

Looking Ahead

NSF has begun obtaining incurred costs audits and plans to continue to do so for every year of the contract. We are planning a site visit to Antarctica in FY 2019.

Why is this a serious management challenge?

This challenge involves an operation that is critical to an NSF core mission. In addition, there is a risk of fraud, waste, or abuse of NSF or other Government assets.

Congress passed the *America COMPETES Act*[8] in 2007 to increase innovation through research and development and to improve U.S. competitiveness in the world economy. As part of the law, institutions applying for NSF funding must describe a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to participating students and researchers. NSF recognizes that the responsible conduct of research (RCR) — the practice of scientific investigation with integrity — is critical for maintaining excellence, as well as the public's trust, in science and engineering. NSF also recognizes that education in RCR is essential to prepare future scientists and engineers.

RCR is more than avoiding research misconduct (fabrication, falsification, and plagiarism). RCR also includes protecting the integrity of data; complying with relevant requirements; communicating openly with researchers, institutions, and funding agencies; mentoring; ensuring responsible authorship; managing conflict of interests; and establishing research environments free of harassment.

NSF has been receptive and responsive to our research misconduct reports and has taken appropriate actions against individuals who committed research misconduct. Further, NSF has taken positive steps to encourage RCR training at funded institutions in response to our 2017 report on institutional implementation of RCR training. In addition, NSF's September 2018 policy requiring grantees to notify NSF of those found to have committed sexual harassment is commendable.

NSF is in a unique position to foster the implementation of effective RCR training — including its content and how it is delivered — for all researchers, especially new members of the research community.

[8] *America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science Act*, Pub. L. No. 110-69

Completed Actions

- ☑ Revised Cultivating Cultures for Ethical STEM program solicitation to include information about the most effective RCR training.
- ☑ Provided information about RCR requirement at NSF Grants Conferences and other outreach events.
- ☑ Emphasized integrity in NSF's strategic plan.
- ☑ Briefed NSF senior management on importance of involving principal investigators and co-principal investigators in the RCR requirement.
- ☑ Issued memorandum on commitment to stop harassment in research/learning environments.

Ongoing Actions

- ➢ Draft additional guidance for the 2020 Proposal & Award Policies & Procedures Guide on research misconduct and available NSF-funded resources for RCR training.
- ➢ Conduct outreach to faculty to encourage them to participate in RCR training.
- ➢ Encourage STEM faculty to incorporate RCR in their mentoring, teaching, and curriculum development.
- ➢ Incorporate new term and condition requiring notification of harassment and assault.

Looking Ahead

We continue to monitor NSF's efforts in this area and encourage NSF to provide substantive guidance to the research community on mentoring and RCR training to accomplish the goals of the *America COMPETES Act*.

Please visit http://www.nsf.gov/oig for our reports and publications.

Introduction
- NSF OIG, Management Challenges for the National Science Foundation in Fiscal Year 2018, October 12, 2017
- NSF OIG Report No. 17-3-003, NSF's Relocation to Its New Headquarters Location — Records Management, Sept. 28, 2017
- NSF OIG Report No. 17-2-009, NSF Could Strengthen Key Controls Over Electronic Records Management, July 6, 2017

Managing Major Multi-User Research Facilities
- NSF OIG Report No. 17-3-004, NSF Needs Stronger Controls Over Battelle Memorial Institute Award for the National Ecological Observatory Network, May 12, 2017

Meeting DATA Act Reporting Requirements
- NSF OIG Report No. 18-2-001, Implementation of the Digital Accountability and Transparency Act of 2014, November 17, 2017

Eliminating Improper Payments
- NSF OIG, IPERA Compliance, April 30, 2018
- NSF OIG Report No. 17-3-005, Inspection of the National Science Foundation's Compliance with the Improper Payments Elimination and Recovery Act of 2010 for FY 2016, May 16, 2017
- NSF OIG Report No. 16-3-005, NSF's Compliance with the Improper Payments Elimination and Recovery Act for FY 2015, May 12, 2016

Managing the Intergovernmental Personnel Act Program
- NSF OIG Report No. 17-2-008, NSF Controls to Mitigate IPA Conflicts of Interest, June 8, 2017
- NSF OIG Report No. 13-2-008, Audit of Cost Associated with NSF's Use of Intergovernmental Personnel Act Assignees, March 20, 2013

Managing the U.S. Antarctic Program
- NSF OIG Report No. 15-2-009, Audit of Health and Safety in the U.S. Antarctic Program, July 2, 2015

Encouraging the Ethical Conduct of Research
- NSF OIG Tracking No. PR12030006, OIG Review of Institutions' Implementation of NSF's Responsible Conduct of Research Requirements, July 25, 2017
- NSF Office of the Director Important Notice No. 140, *Training in Responsible Conduct of Research – A Reminder of the NSF Requirement*, August 17, 2017

Additional Information

About NSF OIG
We promote effectiveness, efficiency, and economy in administering the Foundation's programs; detect and prevent fraud, waste, and abuse within NSF or by individuals who receive NSF funding; and identify and help to resolve cases of research misconduct. NSF OIG was established in 1989, in compliance with the Inspector General Act of 1978, as amended. Because the Inspector General reports directly to the National Science Board and Congress, the Office is organizationally independent from the National Science Foundation.

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- File online report: https://www.nsf.gov/oig/report-fraud/form.jsp
- Anonymous Hotline: 1.800.428.2189
- Mail: 2415 Eisenhower Avenue, Alexandria, VA 22314 ATTN: OIG HOTLINE