

October 15, 2004

**MEMORANDUM**

**To: Dr. Warren Washington  
Chair, National Science Board**

**Dr. Arden Bement  
Acting Director, National Science Foundation**

**From: Dr. Christine C. Boesz  
Inspector General, National Science Foundation**

**Subject: Management Challenges for NSF in FY 2005**

In accordance with the Reports Consolidation Act of 2000, I am submitting our annual statement summarizing what the Office of Inspector General (OIG) considers to be the most serious management and performance challenges facing the National Science Foundation (NSF). We have compiled this list based on our audit work, general knowledge of the agency's operations, and the evaluative reports of others, such as GAO and NSF's various advisory committees, contractors, and staff.

The challenges are unchanged from last year, mainly because they reflect areas of fundamental program risk that continue to pose obstacles to NSF's accomplishment of its mission. They will therefore require ongoing attention from NSF management over the long term. We have duly noted NSF's progress over the last year on many of the challenges listed, although much remains to be done.

The 11 specific challenges fall into five general categories, the first four of which are linked to the President's Management Agenda: 1) strategic management of agency resources, 2) improved financial performance, 3) expanded electronic government, 4) budget and performance integration, and 5) program-specific challenges.

If you have any questions or need additional information, please call me at 703-292-7100.

## 1. Strategic Management of Agency Resources

### *Workforce Planning and Training*

Workforce planning continues to be one of the most serious challenges facing NSF. Since 1999 the number of proposals processed has increased by 40 percent, while the number of program officers assigned to their review has remained relatively flat. Last year alone, the number of proposals increased by 14 percent to 40,075, the largest annual percentage increase in over a decade. The quantity of proposals transmitted to NSF is perhaps the single best indicator of its overall workload. According to NSF, program officers now spend 55 percent of their time on merit review, leaving less time available for other important responsibilities such as award management and oversight and program planning<sup>1</sup>.

NSF's reliance on "non-permanent" personnel is another area of concern. Forty-seven percent of NSF's 700 science and engineering staff are either visiting personnel, temporary employees, or intermittent employees. Visiting personnel make an important contribution to NSF's mission by enabling the agency to refresh and supplement the knowledge base of its permanent professional staff. But managers who serve at NSF on a temporary basis frequently lack institutional knowledge and are less likely or able to make long-term planning a priority. In fact NSF's *Business Analysis* project (a multi-year review aimed at reengineering the agency's core business processes) reports that NSF in general is spending less time on forward-looking activities such as strategic planning and program development. Moreover, there are administrative costs that NSF incurs in recruiting, hiring, processing, and training personnel that rotate every 1 to 4 years. In FY 2004, we conducted an audit that identified the additional salary, fringe benefits, travel and other costs of visiting or temporary personnel, and found three areas where NSF could improve its administration of the programs<sup>2</sup>. Therefore, while visiting personnel are an important resource for NSF, the agency must continually balance the benefits of their services against the additional costs involved.

The agency's response to these and other workforce issues is being formulated as part of the *Business Analysis*, which is scheduled for completion by the end of FY 2005. In FY 2004, NSF initiated an agency-wide workforce planning effort based on the findings of the business analysis to date. NSF's

---

<sup>1</sup> Report to the National Science Board on NSF's Merit Review Process FY 2003 (May 2004)

<sup>2</sup> Audit of Costs Associated with Visiting Personnel, July 23, 2004, OIG 04-2-006. Opportunities for improvement cited in the report include consulting income documentation, IPA pay computations, and VSEE cost of living adjustments.

Human Capital Management Plan, which was delivered in December 2003, integrates and links Human Capital activities to the NSF business plan and to the Human Capital Assessment and Accountability Framework provided by the Office of Personnel Management. While the current plan provides a roadmap for identifying NSF's future workforce needs, the needs themselves are still in the process of being defined.

### *Administrative Infrastructure*

A shortage of administrative resources continues to hinder NSF's staff from keeping pace with its growing workload. NSF states that over the past year it has leased an additional 26,576 square feet of space and the travel budget increased from \$4.32 million in FY 2003 to \$6.05 million in FY 2004 to support the merit review process and increase oversight activities. Management reports that it conducts ongoing assessments of space management and allocation in addition to its regular budget analysis and planning activities. It also encourages video conferencing and telecommuting as methods of leveraging scarce administrative resources.

While these efforts provided some relief, more than a third of the management control weaknesses cited by NSF's managers in the agency's FY 2004 controls assessment involves a shortage of human or administrative resources. Space remains a critical issue, impeding the recruitment of quality staff and the ability to store sensitive documents. In some cases, program officers are sharing cubicles, while contractors are located in file rooms. Travel funds were repeatedly cited as inadequate for the purpose of properly overseeing existing awards. NSF must make it a priority to allocate more of its funding for administrative resources in order to maximize the effectiveness of staff.

## **2. Improved Financial Performance**

### *Management of Large Infrastructure Projects*

NSF's investment in large facilities and infrastructure projects presents management with a number of budgetary and operational challenges. The construction of projects such as telescopes, research equipment, supercomputing databases, and earthquake simulators are inherently risky due to their complex design, cutting-edge technology, and expense. A disciplined project management approach is essential to success; at the same time, modifications are sometimes necessary when developing a new technological tool. NSF spends approximately \$1.1 billion a year on these scientific tools, with many of the projects costing as much as several hundred million dollars each.

NSF continues to make measured progress towards addressing the recommendations we offered during two past audits of large facility projects<sup>3</sup>. Our audit reports identified the need to improve oversight of large projects by enhancing organizational accountability, providing better guidance (particularly in the area of financial management), and improving NSF's systems to capture complete information about project costs. During the past two years, NSF has hired a Deputy Director for Large Facility Projects and developed more detailed guidance to support its *Facilities Management and Oversight Guide*.

However, we remain concerned that NSF does not have adequate staff assigned to oversee and manage large projects, and that those assigned may not have sufficient resources or authority to carry out their responsibilities. In addition, many of the modules intended to support the *Facilities Management and Oversight Guide* are still under development, including those pertaining to financial management. Finally, the problem of recording and tracking the full costs of projects has not yet been addressed. A contract to enhance the financial system for tracking life cycle costs of Major Research Equipment and Facilities Construction projects was awarded at the end of FY 2004.

#### *Post-Award Administration*

Since FY 2002, independent audits of NSF's financial statements have cited weaknesses in the agency's post-award monitoring of grantee institutions as a major deficiency. An effective post-award monitoring program should ensure that: awardees are complying with award terms and conditions and federal regulations; adequate progress is being made toward achieving the objectives and milestones of the program; and expenditures listed on NSF's financial statements are accurate. While NSF has taken some steps over the past three years toward establishing a risk-based program for post-award monitoring of its grants, more needs to be done. NSF must broaden its approach to award monitoring to go beyond high-risk awardees, develop more effective award oversight guidance, and increase the coordination between program and financial officers.

In FY 2004, NSF reorganized the Office of Budget, Finance and Award Management to establish the Division of Institution and Award Support. The Division's role is to manage federal funds awarded by NSF, including providing financial and administrative assistance to institutional awardees and NSF

---

<sup>3</sup> Audit of the Financial Management of the Gemini Project, December 15, 2000, OIG 01-2001

Audit of Funding for Major Research Equipment and Facilities, May 1, 2002, OIG 02-2007

directorates to implement business models, processes and practices. In addition, NSF has increased its outreach to at-risk institutions and developed creative ideas for partnering with other agencies to monitor common grantees. Together these actions represent progress toward addressing post-award administration issues at NSF.

However, NSF's approach to post-award administration focuses too narrowly on high-risk awardees. Because the agency considers only 42 out of its 34,011 awards to be high-risk, the impact of the Award Monitoring and Business Assistance Program (AMBAP) is effectively limited to 0.1% of its award portfolio. To broaden the scope of its activities, NSF should apply more cost-effective monitoring procedures such as desk reviews of reports from awardees and computer-assisted screening to medium and low risk awardees on a random basis.

NSF also issued an award-monitoring guide in FY 2002 and a revised site-visit guide in FY 2003 for agency staff; however, both guides need improvement. In an assessment of NSF's post-award monitoring efforts, IBM Business Consulting commented, "the staff did not follow or only loosely followed the AMBAP guide noting that it was too broad and extensive to be implemented in a realistic timeframe." Meanwhile, the site visit guide does not address many important details for conducting a review, such as how and what types of reviews should be conducted, and therefore does not assure quality or consistency.

The site-visit guide does not standardize documentation for performing or recording the results of the review, thereby increasing the risk that procedures may not be consistently applied. IBM noted that this lack of documentation undermined the follow-up of site visits, and recommended standardized procedures for writing the report, following up, and maintaining documentation in a database for analysis of overall findings. Furthermore, in a recent audit report we cited close coordination between the program and administrative offices as an effective practice of organizations engaged in post-award monitoring and oversight<sup>4</sup>. NSF should seek to develop one comprehensive approach to award monitoring that would include both a financial and programmatic component.

Finally, the Improper Payments Improvement Act of 2002 requires agencies to review all programs and activities annually and identify those that are susceptible to significant improper payments. In May of 2003, the Office of Management and Budget (OMB) issued guidance requiring agencies to

---

<sup>4</sup> Management Framework: Award Monitoring; September 30, 2003; OIG 03-2-015

statistically sample those programs at high risk for improper payments and establish baseline error rates and improvement targets for future reporting. NSF, like other grant making agencies, is challenged to implement the OMB requirements. Since improper payments include those made by NSF's awardees and subawardees, designing a methodology to statistically sample the voluminous number of payments made by NSF's 2500 awardees is complex.

### *Cost Sharing*

Cost sharing refers to the contribution of financial or in-kind support by recipients of federal grants to the cost of their research projects. Federal guidelines require that the accounting of cost-shared expenses be treated in a manner consistent with federal expenditures. However, our past audit work indicates that many awardees do not adequately account for or substantiate the value of cost-shared expenditures, raising questions about whether required contributions are actually being made.

Two years ago, NSF changed its policy to require cost sharing above the statutory requirement *only when there is tangible benefit to the awardee*, such as a facility that will outlast the life of the research project or income derived by the awardee as a result of the research. There is evidence that the new policy has effectively curtailed new cost sharing agreements. The number of new awards that include cost sharing declined from 3346 in FY 2001 to just 1556 during FY 2004. During the same period, the amount of promised cost sharing declined by 54 percent. Less cost sharing reduces the potential for compliance problems and the burden on the agency for correcting them.

While reducing cost sharing requirements mitigates the challenge, it does not eliminate it since some cost sharing is required by statute and some is voluntary. The agency states that it is providing greater oversight in the risk assessment protocol and site reviews. Cost sharing is also identified as a high-risk factor and a focus of the new protocol. It is too early to assess the effectiveness of these efforts. In October, the agency acted to eliminate future cost sharing except for what is required by statute. The policy is likely to further reduce the amount of cost sharing entered into by the agency but to what extent is not known. We will continue to monitor the substantial amount of cost shared funds still outstanding and reassess changes brought about by the new policy.

### 3. Expanded Electronic Government

#### *Information Security*

NSF must have a comprehensive and effective information technology (IT) security program both to meet Federal requirements and to mitigate risks that threaten the successful operation and development of its IT systems. These systems and the information they contain need to be protected from unauthorized access, use, disclosure, disruption, modification, and destruction. Over the past several years, NSF has taken a number of steps to strengthen its IT security program. For example, it formed a Security Working Group comprised of managers from across the agency to set NSF policy and procedures, and established a new security office to implement them. All staff are required to complete security awareness training each year. NSF has undertaken penetration testing of its systems in order to find and address vulnerabilities more quickly. In addition, the agency completed the certification and accreditation of 18 of its 19 general support systems and major applications by the end of FY 2003, and in FY 2004 began a triennial cycle of recertification of all systems. Also in FY 2004, the Office of Polar Programs completed a comprehensive inventory of the systems supporting the U.S. Antarctic Program (USAP), classifying them as one general support system and two major applications, rather than one major application as they had been classified in 2003. The agency plans to certify and accredit those systems by the end of CY 2004,

Despite these accomplishments, IT security is an ongoing challenge for NSF, as for all federal agencies, and some weaknesses remain. The OIG's FY 2004 Federal Information Security Management Act (FISMA) report issued on June 30, 2004, noted that the systems serving the USAP still had not been certified and accredited, information security policies had not been established and implemented, and required background investigations for key information security personnel had not been performed. Our review also found that NSF had not updated its risk assessments and security plans to account for the migration of its payroll and personnel systems to another federal agency, NSF's disaster recovery plan had not been fully tested, and access controls could be strengthened. These vulnerabilities could result in unauthorized access to and modification of financial, programmatic, and other sensitive information; loss of assets; health and safety risks; and disruption of critical operations and the ensuing costs associated with business downtime and recovery. NSF has reported that it has made significant progress in all these areas since our review.

## 4. Budget and Performance Integration

### *GPRA Reporting*

Congress enacted the Government Performance and Results Act (GPRA) in 1993 as a means of making government more results oriented. The Act requires each agency to develop a strategic plan that establishes specific goals against which its performance can be objectively evaluated. To further focus government agencies on results, the President's Management Agenda requires that performance be considered in funding and management decisions and that programs work toward continual improvement. In support of these objectives, OMB introduced the Program Assessment Rating Tool (PART) to provide a framework for evaluating performance and generate program effectiveness ratings for Congress to consider when making budget decisions.

GPRA poses a significant challenge to agencies involved in science or education research because the benefits are difficult to measure and may only become apparent over time. Moreover performance measures must be carefully formulated so as not to discourage appropriate high-risk research that offers the potential for a "transformational" discovery. Because of the complexity involved in measuring the benefits of research, a full discussion of the methodology employed in reporting performance results should be prominently included in each performance report. Last year we issued an audit report on the Committee of Visitors panels that are used by NSF to provide qualitative data for GPRA reporting. We found that some of the limitations associated with the use of the data were not fully disclosed in the agency's GPRA report. Further, we noted that NSF relied on judgmentally selected "nuggets" (research success stories) as evidence that it has achieved its GPRA goals, again without full disclosure. Our report indicated that a user of NSF's performance report might infer that the nuggets are representative of the performance of the entire portfolio, and the credibility of the reports could become compromised. We recommended that NSF more clearly disclose the limitations associated with both issues.

In FY 2004, NSF has expanded its disclosure of the methodology it employed and while this disclosure has resolved the issues raised in the audit report, we continue to believe NSF should report on the performance results of its entire research portfolio. To do this, NSF will need to develop a knowledge management system to capture, categorize and analyze the research results.

### *Cost Accounting*

An effective accounting and reporting system is essential to attaining the objectives of the President's Management Agenda and complying with GPRA. However, NSF's current information systems do not readily provide the cost accounting information necessary to link its costs to program performance. While NSF has been a leader in generating annual financial statements that have received "unqualified" audit opinions for the past six years, it is only beginning to focus on developing a cost accounting system to address its program performance evaluation and reporting needs.

For the past four years, each financial statement audit has recommended that NSF identify management cost information requirements for each organizational unit or program, establish activities/projects and corresponding outcomes within each unit, and develop and report cost efficiency measures that align with outputs and outcome goals. The auditors have also noted that NSF's systems do not track complete cost data for projects in which the costs are borne by more than one NSF directorate or organizational unit. Consequently, program officers cannot monitor the full cost of a project.

In FY 2004, NSF management developed a Budget, Cost and Performance Integration (BCPI) work plan that was approved by OMB. The agency states that cost accounting is a key element of the BCPI plan. A crosswalk was developed between the costs accounted for in the appropriations reporting system and those in the new programmatic reporting framework. When NSF is able to interface the crosswalk with the Financial Accounting System, the agency will be able to identify the full direct costs of its programs and projects, including its large facility projects. However, the plan does not provide for tracking costs of NSF's internal business processes and activities such as the cost of soliciting grants, conducting merit reviews, or performing post-award grant administration. Identifying the costs of these internal functions is important for evaluating NSF's performance accomplishments under its organizational excellence strategic goal.

## **5. NSF Program-Specific Challenges**

### *Management of U.S. Antarctic Program*

As part of its mission, NSF finances and supports Antarctic research, providing over \$197 million in FY 2004 for research activities in Antarctica. Its single largest award is a contract for Antarctic logistics and support services valued at \$1.116 billion over 10 years. Each year the United States Antarctic

Program (USAP) deploys about 700 people to the continent to perform scientific research and another 2,500 to provide logistics in support of this research, including the operation and maintenance of year-round research stations. Those deployed include research teams from academia, industry, and government, military personnel, and contractor employees.

NSF's contract for Antarctic support contains many inherent risks and complex requirements. The contractor must have technical expertise in a variety of disciplines, including medical and environmental engineering, and is responsible for managing a number of subcontractors in the U.S. and overseas. Therefore, NSF's oversight of the programmatic and financial performance of this large contract is itself a formidable challenge, requiring considerable administrative and technical skill. The remote and harsh Antarctic landscape leaves little margin of error for many basic support activities. For example, weaknesses in the USAP information system were cited as a reportable condition during the agency's most recent IT audit since they could potentially disrupt essential life support or science activities. The agency also has yet to resolve an outstanding recommendation from an audit report issued last year aimed at strengthening the USAP's capital asset management program and renewing its aging infrastructure. The issue involves how best to assure funding is available to maintain the infrastructure in a timely manner. NSF comments that it has sustained an ongoing effort to maintain and upgrade facilities at McMurdo and Palmer Stations, albeit at a slower pace than is ideal, and affirms that the USAP is providing a safe and healthy environment.

A recent audit identified instances of overbilling by the contractor. Consequently, the OIG is planning to conduct a financial and compliance audit of the Antarctic Logistics and Support Contractor that will include a review of internal controls over cash management and compliance with various fund restrictions. We will also continue to monitor its information systems.

### *Broadening Participation in the Merit Review Process*

The merit review process is a cornerstone of NSF's operations, ensuring the integrity and fairness of the proposal review process and maintaining the high standards of excellence for which NSF is known. NSF was able to fund only 27 percent of the more than 40,000 proposals it received in FY 2003. The agency decides which research, engineering and education projects to fund by subjecting most proposals to a rigorous merit review process that ensures each will receive knowledgeable and unbiased consideration based on specific criteria. It is largely through the merit review system that NSF adds value to the national research and education enterprise. One objective in NSF's Strategic Plan is to increase the participation of underrepresented

groups and institutions in all NSF programs and activities, including merit review. Developing the untapped potential of underrepresented groups should lead to expanded individual opportunity and improved national competitiveness and prosperity.

During FY 2003, the percentage of underrepresented groups that received awards remained steady, with female and minority PIs funded at approximately the same rate as the overall proposer population. The number of awards made to minority PIs remains at 5 percent of total awards. Beginning in FY 2001, NSF started requesting demographic data from all merit panel reviewers to determine the extent of participation of underrepresented groups in the NSF reviewer population. However, NSF cannot legally require reviewers to provide demographic information. In FY 2003, out of a total of 40,020 reviewers who returned reviews, only 5,336 provided demographic information. Thirty-four percent of those indicated they were members of an underrepresented group. In FY 2004, NSF continued to use seminars and workshops at minority-serving institutions in an effort to expand interest in NSF's programs. Reviewer diversity is emphasized through the use of a large and expanding Foundation-wide reviewer database, explicit policy guidance, mandatory training for all program officers, and directorate-level initiatives. The agency will also continue to request demographic information and adjust the FastLane reviewer module to make it more convenient for reviewers to provide such information.

### *Math and Science Partnership*

NSF has responsibility for the Math and Science Partnership (MSP) program, a key element of the President's initiative, *No Child Left Behind*, aimed at strengthening and reforming K-12 education. In FY 2002 and 2003, NSF awarded a total of \$280 million to fund partnerships between school districts, colleges and universities, and other organizations for the purpose of improving math and science education at the K-12 level. NSF has requested an additional \$80 million to support ongoing activities of the MSP program in FY 2005. The program poses several challenges for NSF, including the need to facilitate partnerships among institutions that do not normally collaborate, monitor awardees that are unaccustomed to handling federal funds, and ensure that projects are implemented as proposed and have effective evaluation plans that adequately report their impact on student achievement.

In a recent report, we reviewed the evaluation plans for nine of the first 23 MSP projects and found that five had effective evaluation plans. The other four projects in our sample were missing key elements of an effective evaluation process. In response to this finding, NSF plans to enlist the help of evaluation

experts to frame a statement of practice to serve as a framework for current and future MSP award recipients. We also recommended that the agency develop a comprehensive management plan for evaluating the MSP program. An award for an external evaluation of the MSP program consistent with the research and development nature of the program was recently made.

## Reporting Requirements

Under the Inspector General Act, we report to the Congress every six months on the following activities:

- Reports issued, significant problems identified, the value of questioned costs and recommendations that funds be put to better use, and NSF's decisions in response (or, if none, an explanation of why and a desired timetable for such decisions). (See p.p. 5,13,35)
- Matters referred to prosecutors, and the resulting prosecutions and convictions. (See p.p. 25, 46-47)
- Revisions to significant management decisions on previously reported recommendations, and significant recommendations for which NSF has not completed its response. (See p.45)
- Legislation and regulations that may affect the efficiency or integrity of NSF's programs. (See p. 8)
- OIG disagreement with any significant decision by NSF management. (None)
- Any matter in which the agency unreasonably refused to provide us with information or assistance. (None)



## Appendix 3

## Acronyms

AIGI	Associate IG for Investigations
AMBAP	Award Monitoring and Business Assistance Program
ARMS	Australian Research Management Society
BCPI	Budget, Cost and Performance Integration
CFO	Chief Financial Officer
CIO	Chief Information Officer
COI	Conflict of Interest
COV	Committee of Visitors
DACS	Division of Acquisition and Cost Support
DCAA	Defense Contract Audit Agency
DD	Division Director
DFE	Designated Federal Entity
DGA	Division of Grants and Agreements
DOJ	Department of Justice
ECIE	Executive Council of Integrity and Efficiency
FDP	Federal Demonstration Partnership
FISMA	Federal Information Security Management Act
FOIA	Freedom of Information Act
FY	Fiscal Year
G&A	General & Administrative
GAO	General Accounting Office
GPM	Grant Policy Manual
GPRA	Government Performance and Results Act
IDR	Illinois Department of Revenue
IG	Inspector General
IPA	Intergovernmental Personnel Act
IRB	Institutional Review Board
IR/D	Individual Research and Development
MRE	Major Research Equipment
MREFC	Major Research Equipment and Facilities Construction
MSP	Math and Science Partnership
NCURA	National Council of University Research Administrators
NSB	National Science Board
NSF	National Science Foundation
OIG	Office of Inspector General
OMB	Office of Management and Budget
OPP	Office of Polar Programs
ORI	Office of Research Integrity

## Acronyms (cont'd)

PART	Program Assessment Rating Tool
PCIE	President's Council on Integrity and Efficiency
PHS	Public Health Service
PI	Principal Investigator
PFCRA	Program Fraud Civil Remedies Act
REU	Research Experiences for Undergraduates
SBIR	Small Business Innovation Research
STC	Science and Technology Centers
USAP	United States Antarctic Program
VSEE	Visiting Scientists, Engineers and Educators