



U.S. NATIONAL SCIENCE FOUNDATION Office of Inspector General

Case Closeout Memorandum

OIG Case Number I-24-0030-O | April 24, 2025

This case originated after an NSF OIG proactive initiative uncovered evidence that an NSF Small Business Innovation Research (SBIR) awardee was allegedly performing award-related Research/Research and Development (R/RD) from outside the United States. Our investigation substantiated the allegation that the Principal Investigator (PI) failed to follow NSF award terms and conditions and SBIR Policy Directive by completing award R/RD while abroad. Additionally, we determined that on multiple occasions throughout the award's Period of Performance, the company did not bill PI hours on a proportional or consistent basis as required by award terms and conditions and in accordance with Generally Accepted Accounting Principles. The investigation was referred to the Department of Justice who ultimately declined to prosecute.

Based on our recommendation, NSF withheld the remaining \$181,940 on the closed Award.

This case has been **closed**, and no further action will be taken.