Proposal & Award Policies & Procedures Guide (PAPPG) Now Available

NSF received final approval from the Office of Management and Budget on the proposed changes to the PAPPG and released it to the community on October 30th. Each time that a new PAPPG is issued, NSF provides the community a minimum of ninety days to review the changes before they go into effect. The revised PAPPG (NSF 18-1) will be effective for proposals submitted or due, or awards made, on or after January 29, 2018.

Awards issued prior to January 29, 2018, will continue to follow the terms and conditions associated with the individual award. Should changes (such as a continuing grant increment, supplemental funding and/or a no-cost extension) be made to existing awards after this effective date new terms and conditions that reference the 2018 PAPPG will be included in the award.

Although the August/September issue of the newsletter detailed the proposed significant changes we are outlining them here again for your convenience.

Revision of Eligibility Standards
NSF has revised eligibility standards for international branch campuses of IHEs. Specifically, if a proposal includes funding to be provided to an international branch campus of a US institution, the proposer must explain the benefit(s) of

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Account Management Updates

This coming spring NSF is making major changes to the way the research community maintains account and user profile information in FastLane and Research.gov.

Principal Investigators (PIs), Research Administrators, Reviewers, and Graduate Research Fellowship Program (GRFP) applicants have separate user logins, with user profile information being maintained in multiple locations in NSF’s systems. In addition, users must request roles for NSF systems from their organizations’ administrators, with no ability for users to self-manage their personal profile data. NSF’s registration and role request processes will be updated this spring when the Foundation launches new account management functionality in Research.gov.

A centralized and streamlined account registration process for the external research community will provide each user with a single profile and unique identifier (i.e., NSF ID) to be used across all NSF systems. Once the new functionality is implemented, individuals will use a centralized login in Research.gov with new role request features and dashboards for managing accounts.

The new Account Management functionality will:

- Allow users to create and self-manage accounts, including updates to personal and role information;
- Provide a central location to request roles for access to NSF systems;
- Provide organization administrators the ability to manage roles for their organizations through a dashboard with functions to approve, disapprove, assign and remove roles;
- Replace existing FastLane and Research.gov account functions and expand capabilities for future account modernization to new user groups such as GRFP applicants, proposal reviewers and NSF staff; and
- Enable NSF to efficiently carry out internal audit compliance and conflict of interest management.

Existing users will be migrated to the new account management system and will have the opportunity to confirm current account information in the new environment. NSF plans to release the new functionality in spring 2018 to the organization user groups including PIs, Sponsored Project Officers (SPO), Authorized Organizational Representatives (AOR), Administrators, Award Cash Management Service (ACM$) users, GRFP Coordinating Officials, and GRFP Financial Officials to build the foundation for consolidated account and role management.

Stay tuned for additional Account Management modernization information in the coming months. In the meantime, we invite you to view a recent presentation and visit NSF’s Electronic Research Administration (ERA) Forum website for additional Account Management modernization information and a walkthrough of conceptual mockups which demonstrate the new functionality.

Hurricanes Prompt Highlight of Deadline Date Policy

The recent spate of hurricanes this year demonstrated the need to highlight existing NSF policy designed to provide flexibility in meeting announced deadlines in the event that a natural or anthropogenic disaster impacts a proposer’s ability to submit a proposal to NSF.

Should a disaster prevent a proposer or an organization from submitting a timely proposal to the Foundation, an NSF Program Officer may authorize proposal submission after the deadline. According to the policy outlined in PAPPG, Chapter I.F., proposers should follow the written or verbal guidance provided by the NSF Program Officer. The Foundation...

A new NSF website (NSF Responses to Natural Disasters) now includes information about NSF policies during a natural disaster, and locates all NSF communications about recent disasters in one place.

Check the “Special Exception to the Deadline Date Policy” box on the NSF Cover Sheet, and indicate NSF approval has been obtained. A statement identifying the nature of the impacting event should be uploaded under Nature of Natural or Anthropogenic Event in the Single Copy Document section in FastLane. If available, written approval from the cognizant NSF Program Officer also should be uploaded under the Additional Single Copy Documents in the Single Copy Document section in FastLane.

Questions about NSF’s special exceptions to deadlines policy should be directed to policy@nsf.gov.
Unfunded Collaborations

The Policy Office receives many inquiries about how to include details about an unfunded collaboration in proposals to NSF. To answer these questions, it is important to review both Federal and NSF cost sharing policies. As stipulated in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR § 200.99:

“Voluntary committed cost sharing means cost sharing specifically pledged on a voluntary basis in the proposal’s budget or the Federal award on the part of the non-Federal entity and that becomes a binding requirement of Federal award.”

NSF policy in PAPPG, Chapter II.C.2.g states that:

“...to be considered voluntary committed cost sharing, the amount must appear on the NSF proposal budget and be specifically identified in the approved NSF budget. Unless required by NSF, inclusion of voluntary committed cost sharing is prohibited and Line M on the proposal budget will not be available for use by the proposer.”

Except for a very limited number of program solicitations, inclusion of voluntary committed cost sharing is prohibited in NSF proposals. Proposers, however, may include voluntary uncommitted cost sharing in proposals to NSF. Voluntary uncommitted cost sharing must not be included on the budget or in the budget justification. Rather, in accordance with PAPPG, Chapter II.C.2.i:

“Proposers should include an aggregated description of the internal and external resources (both physical and personnel) that the organization and its collaborators will provide to the project, should it be funded.”

Proposers should include a description of the nature of the collaboration in the Facilities, Equipment & Other Resources section of the proposal. Each unfunded collaboration outlined in the proposal should also be accompanied by a letter of collaboration from each collaborator. Those letters should be brief, limited to stating the intent to collaborate and should not contain endorsements or evaluation of the proposed project. Detailed information about unfunded collaborators is available in the PAPPG, Chapter II.C.2.d(iv).
Performing (part or all) of the project at the international campus. This applies to both subaward and consultant arrangements. Further, the proposer must justify why the project activities cannot be performed at the US campus.

Foreign organization eligibility will be revised so that the proposer must demonstrate that one or more of the following criteria will be met:

- The foreign organization contributes a unique organization, facility, geographic location and/or access to unique data resources not generally available to US investigators (or which would require significant effort or time to duplicate), or other resources that are essential to the success of the proposed project.
- The organization to be supported offers significant scientific and engineering education, training or research opportunities to the US.

Details about the eligibility standards can be found in PAPPG, Chapter I.E.

Collaborators and Other Affiliations (COA) Template

NSF is implementing the required use of the COA template, which was tested as a pilot beginning in April 2017. NSF uses collaborator and other affiliation information during the merit review process to help manage reviewer selection. COA information must be provided separately for each individual identified as senior project personnel. The guidance provides specific instructions on the types of collaborations that must be identified in the template.

Details about the COA information can be found in PAPPG, Chapter II.C.1.e.

Budget Justification Page Increase

With the new guidance, proposers may now include a budget justification of up to five pages (previously, the budget justification was limited to three pages). This applies to both the primary proposer as well as any subaward budget justifications.

Details about the budget and budget justification can be found in PAPPG, Chapter II.C.2.g.

New Single Copy Document on Proposal Submission by Former NSF Staff

The PAPPG contains new coverage that addresses proposal submission by former NSF staff. It is important to note that for one year following separation from the Foundation, any communication with NSF by a former employee must be done via a “substitute negotiator.” Information about the substitute negotiator must be provided as part of the proposal via a single copy document.

Details about the new single copy document can be found in PAPPG, Chapter II.C.1.f.

New Header Requirement in the Project Description

The PAPPG now specifies that the Project Description for proposals submitted to NSF must include a separate section within the narrative labeled “Intellectual Merit.” This mirrors the current requirement to have a separate section labeled “Broader Impacts.”

Details about the new header requirement can be found in PAPPG, Chapter II.C.2.d.

Results from Prior NSF Support Clarification

NSF clarified the language in the Results from Prior NSF Support section of the PAPPG to indicate that if any PI or co-PI identified on the proposal has received an NSF award with an end date in the past five years or in the future (including any current funding and no cost extensions), information on the award is required for each PI and co-PI. This applies regardless of whether the support was directly related to the proposal or not.

Details about results from prior NSF support can be found in PAPPG, Chapter II.C.2.d(iii).

Organizational Responsibility to Define “Year” for Senior Personnel Salaries

NSF’s senior personnel salary policy states that “NSF limits the salary compensation requested in the proposal budget for senior personnel to no more than two months of their regular salary in any one year.” The draft PAPPG now also clarifies the point that it is the organization’s responsibility to define and consistently apply the term “year.”

Details about senior personnel salary can be found in PAPPG, Chapter II.C.2.g(ii)(a).

Vertebrate Animals

The PAPPG adds language that reflects a new award-specific condition regarding an organization’s responsibilities for projects involving vertebrate animals. More specifically, the award condition states that it is the grantee’s responsibility to ensure that the Institutional Animal Care and Use Committee (IACUC) approval remains valid at all times that animal work is conducted under the award. It further states that additional IACUC approval must be obtained if the protocols have changed substantively from those originally proposed and approved.

Details about vertebrate animals can be found in PAPPG, Chapter II.C.2.g(ii)(a).

Human Subjects

The PAPPG includes the new award-specific condition that it is the

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Public Access Policy – Results of NSF Funded Research

In January 2016, NSF implemented its Public Access Plan: Today’s Data, Tomorrow’s Discoveries: Increasing Access to the Results of Research Funded by the National Science Foundation. This was in response to a government-wide initiative by the White House’s Office of Science and Technology Policy (OSTP) to provide access to publicly funded research results. Specifically, it directed Federal agencies with more than $100 million in research and development (R&D) expenditures per year to develop plans to make publicly available to the “greatest extent and with the fewest constraints possible and consistent with law” the “direct results of federally funded scientific research.”

NSF’s public access policy reflects the Foundation’s commitment to making certain that, to the extent possible, the American public, industry and the scientific community have access to Federally funded scientific research results.

This policy applies to awards funded in whole or in part as a result of proposals submitted, or due, on or after January 26, 2016.

Grantees must ensure that articles in peer-reviewed scholarly journals and papers in juried conference proceedings:

- Are deposited in a public access compliant repository (as identified in the Public Access Policy);
- Are available for download, reading, and analysis within 12 months of publication;
- Possess a minimum set of machine-readable metadata elements as described in the Public Access Policy; and
- Are reported in annual and final reports with a persistent identifier.

In this matter, NSF has endeavored to make compliance as streamlined as possible by requiring Principal Investigators to deposit a copy of any peer-reviewed journal publication (either the final accepted version or the version of record) or any juried conference paper into the NSF Public Access Repository for articles, eligible publications or conference papers in order to report that publication or conference paper in annual or final project reports.

In this matter, NSF has endeavored to make compliance as streamlined as possible by requiring Principal Investigators to deposit a copy of any peer-reviewed journal publication (either the final accepted version or the version of record) or any juried conference paper into the NSF Public Access Repository for articles, eligible publications or conference papers in order to report that publication or conference paper in annual or final project reports.

PIs must ensure that all researchers who work on projects funded in whole or in part by NSF grants or cooperative agreements comply with the public access policy. We also have developed a streamlined process to support publication and related metadata entry in annual and final project reports for all publications subject to the requirement, to make submission of papers into the public access repository a natural and straightforward part of “business as usual” for a PI. The publications are also available to NSF Program Officers via our internal electronic systems.

More information on NSF’s public access policy, including FAQs and a video tutorial is available on the NSF Public Access website.

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Life Sciences Dual Use Research of Concern

New language has been added regarding NSF funded research with certain high-consequence pathogens and toxins. NSF will not consider funding research that would lead to a gain of function for agents of concern.

Details about life sciences dual use research of concern can be found in PAPPG, Chapter II.D.6 and PAPPG, Chapter XI.B.5.

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organization’s responsibility to ensure that an IRB approval for human subjects work remains valid at all times that such work is conducted. Like the vertebrate animals’ guidance, IRB approval must be obtained if the protocols have changed substantively from those originally proposed and approved. Further direction has been added regarding supplemental funding, which does not require a separate IRB approval letter unless the scope of the project has substantively changed.

Details about human subjects can be found in PAPPG, Chapter II.D.5.

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We hope you continue to enjoy this newsletter and share it with your colleagues!
Proposal Preparation and Submission in Research.gov to Begin in April

Beginning in April 2018, proposers will be able to prepare and submit non-collaborative research proposals in Research.gov. The initial release of this new capability will run in parallel with existing FastLane proposal preparation and submission capabilities, so proposers can choose to prepare and submit non-collaborative research proposals in Research.gov or in FastLane. Separately submitted collaborative proposals must still be submitted in FastLane. NSF will preview the new functionality to the research community in February 2018, to collect preliminary feedback and to provide the community an opportunity to acclimate to the new technology. Some of the new proposal preparation capabilities that the community will be able to preview in February include page formatting compliance checks, project summary and project description heading compliance checks, and a completely redesigned display of the budget.

After deploying the new Research.gov functionality for non-collaborative research proposals, NSF plans to obtain user feedback from the initial release to implement enhancements and expand functionality incrementally, with the goal of eventually transitioning all proposal preparation and submission functionality from FastLane to Research.gov. Feedback from the research community will be used to evaluate the success of the initial release, determine areas for improvement, and assess future incremental functionality releases.

NSF began this multi-year initiative to modernize proposal submission capabilities and migrate them from FastLane to Research.gov. Launched in 1994, FastLane is built on technology now considered out-of-date and with inflexible architecture. This hinders NSF’s ability to quickly and cost-effectively meet NSF’s ongoing and emerging needs. Through current technology and integrated, flexible systems, NSF seeks to enable greater automation and business process improvement.

NSF’s goals are to:

- Modernize the applications supporting the proposal submission and merit review processes and improve the user experience via the development of a new application;
- Reduce the administrative burden to the research community and NSF staff associated with preparation, submission, and management of proposals;
- Increase efficiencies in proposal preparation, submission, and management;
- Improve data quality and capture proposal content in a way that supports data analytics; and
- Improve availability, security, and flexibility of proposal preparation and submission to NSF IT systems.

Please be on the lookout for more exciting release details to follow. Also, check out a recent presentation and visit NSF’s Electronic Research Administration (ERA) Forum website for additional information and a demonstration of the new proposal preparation functionality in Research.gov.
Outreach

NSF recently held the Fall 2017 NSF Grants Conference in Phoenix, Arizona on November 13-14. These conferences are especially designed for new faculty, researchers and administrators who want to gain key insight into a wide range of current issues at NSF including the state of current funding; new and current policies and procedures; and pertinent administrative issues.

If you were unable to attend in person or view the live webcast this past month, NSF will make the plenary session videos available on the NSF Grants Conference website soon. Below are the sessions that will be available for on-demand viewing:

- **NSF – An Introduction and Overview:** Learn about NSF’s purpose, mandate, organizational structure, program and budget highlights (including current budget status), trends, areas of special emphasis, and other special initiatives.

- **Types of Funding Opportunities:** NSF research proposals are not the only mechanism used to provide funding. You’ll learn about the various mechanisms NSF uses to fund proposals such as RAPID, EAGER, RAISE, Ideas Labs, and Conferences, to name a few. They’re not all the same!

- **Proposal Preparation:** NSF Program Officers review how and when to prepare a proposal, including discussion of what constitutes a project and a proposal of high quality. Presenters discuss do’s and don’ts, recent procedural changes, as well as the various sources of NSF funding opportunities.

- **NSF Merit Review Process:** NSF Program Officers discuss the philosophy of merit review and how it works, as well as ad hoc and multi-tiered reviews. Presenters also cover the role of the Program Officer, timing of proposal submissions, reviewer selection, release of reviewer comments, and conflict-of-interest issues related to merit review.

- **Award Management:** Learn about award requirements and conditions, and the responsibilities of those involved in the award process—principal investigators, grantee institutions, Program Officers, research administrators, and agency grants officials.

- **NSF Policy Update:** Understand the new policies and procedures that affect your organization.

- **Overview of the Office of the Inspector General (OIG):** OIG staff discuss the roles and responsibilities of the OIG, as well as issues arising from current audits and investigations.

- **Overview of the Office of International Science and Engineering (OISE):** Staff discuss the OISE role in coordinating activities as well as how to incorporate international components in NSF proposals.

- **Faculty Early Career Development (CAREER) Program:** Get an introduction to this Foundation-wide activity that offers NSF’s most prestigious awards in support of junior faculty who exemplify the role of teacher-scholars.