



# National Science Foundation GRANTS CONFERENCE

TAMPA, FL      JUNE 1-2, 2015

## NSF Policy Update



Hosted by the State University System of Florida at the University of South Florida

# Panelist

## Jean Feldman

Head, Policy Office, Division of Institution & Award Support, Office of Budget, Finance & Award Management



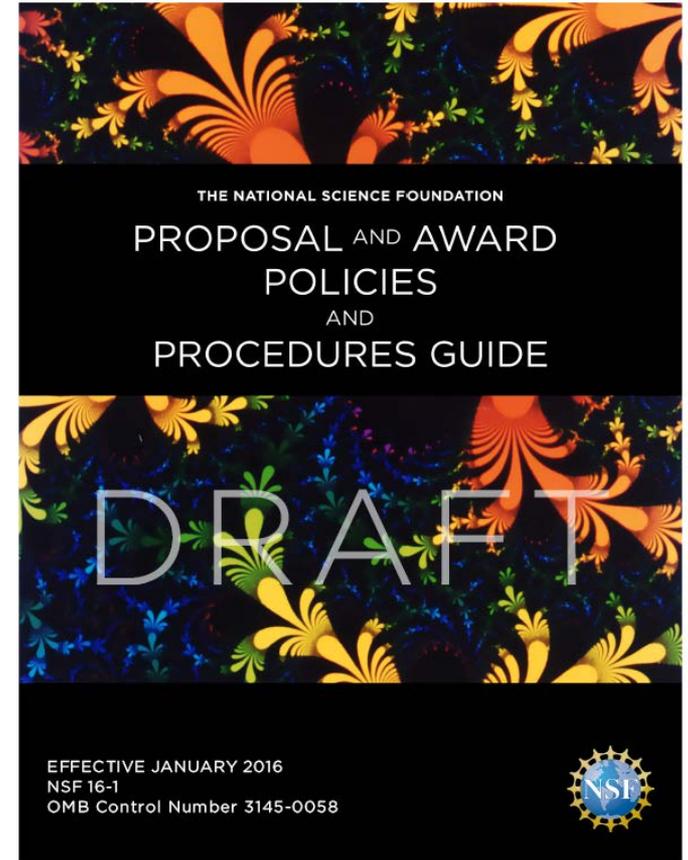
# Topics

- Draft Proposal & Award Policies & Procedures Guide – Federal Register
- Public Access Plan
- Automated Compliance Checking
- What's New in Research.gov
- Uniform Guidance FAQs
- Pilot Activities to Reduce Administrative Burden
- Opportunity in the Policy Office



# PAPPG – Federal Register Notice

- Public comment period for proposed changes
  - 60 days
- Timeline for Issuance
  - May 19, 2015 – Federal Register
  - October 2015 – Published
  - January 2016 – Effective



# Significant Changes Proposed

- Where possible, language has been streamlined by removing text from the PAPPG that is displayed on the FastLane or Research.gov screen
- AOR will now provide proposal certifications upon submission of the proposal
  - NSF is removing the ability for post-submission certifications by the AOR
- 5 p.m. submitter's local time is time standard for all submissions; deviations in solicitations and Dear Colleague Letters will no longer be permitted



# Significant Changes Proposed (Cont'd)

- Language has been removed permitting solicitations to specify different type size, margin and spacing requirements
- Collaborator and Other Affiliation Information has been removed from Biographical Sketch and will now be submitted as a single copy document
  - Page limitation on Biographical Sketch remains two pages
- Greater clarity has been inserted on providing the Project Summary as supplementary document



# Significant Changes Proposed (Cont'd)

- Use of “must” and “may” has been reviewed throughout, and revised, where appropriate
- Results from Prior NSF Support has been clarified to:
  - identify when the start of the five year period begins
  - provide examples of the types of NSF awards included as prior support
- References Cited section has had footnote moved to full text to reiterate that submission of URLs is not required



# Significant Changes Proposed (Cont'd)

- Biographical Sketches and Current and Pending Support information may no longer be submitted as a single PDF associated with the PI
- Internal institutional resources has been added as an example of Current and Pending Support
- Formatting instructions has been added for Letters of Collaboration
- Greater clarity has been provided regarding the type of information necessary for proposals that include use of vertebrate animals



# Significant Changes Proposed (Cont'd)

- NSF implementation of Dual Use Research of Concern has been incorporated
- Proposal Preparation Checklist has been revised to identify items most frequently missed by proposers
- Language has been added regarding NSF's implementation of the Federal Awardee Performance and Integrity Information System
- Post-award Notification and Request instructions have been revised to specify that such communications must be signed and submitted by the Authorized Organizational Representative



# Significant Changes Proposed (Cont'd)

- Public Access Implementation incorporated into the AAG, with a link to the proposed term and condition



# NSF's Public Access Plan: Highlights

- **Requires** deposit of journal articles and juried conference papers in the NSF Public Access Repository (NSF-PAR), hosted by DOE/OSTI, within 12 months following initial publication
  - Effective for journal articles and juried conference papers from proposals submitted or due on or after the PAPPG effective date in January 2016.
- Allows for a **waiver** to the 12-month embargo for publications
- **Retains** current Data Management Plan requirements and calls for community engagement to create more consistent management of research data.
- **Retains** current policies permitting costs of publication and the sharing of research results as a direct cost in the proposal budget
- Provides a **framework**, allowing NSF to:
  - Engage additional partners in a federated system
  - Evolve specific policies appropriate to NSF's broad and highly heterogeneous research communities
- More information available at [https://www.nsf.gov/news/special\\_reports/public\\_access/](https://www.nsf.gov/news/special_reports/public_access/).



# NSF's Public Access Plan: Next Steps

- NSF has published draft public access implementation language in the proposed revision of the *Proposal & Award Policies & Procedures Guide* (PAPPG). Comments are due July 20, 2015.
  - [http://www.nsf.gov/bfa/dias/policy/papp/pappg16\\_1/fedreg/draftpappg\\_may2016.pdf](http://www.nsf.gov/bfa/dias/policy/papp/pappg16_1/fedreg/draftpappg_may2016.pdf)
- NSF will continue work on the repository system with DOE/OSTI with the goal of standing up a beta system by the end of December, 2015.
- NSF will continue to engage the research communities around data management in support of public access goals
- For more details, please attend the NSF IT Modernization/Research.gov break out session



# Automated Compliance Checking

## Proposals submitted in response to GPG, Program Descriptions and Announcements

### Auto-compliance checks for unsolicited proposals – January 26, 2015:

- **Enforce page count rules for the following proposal sections:**
  - Project Description
  - Budget Justification
  - Mentoring Plan
  - Data Management Plan
- **Budget Checks: implement duration and requested amount compliance checks**
  - Example: maximum requested amount cannot exceed \$200,000 for a RAPID proposal
- **Enforce proposal sections depending on the funding mechanism type**
  - Example: do not enforce References Cited for a Conference proposal



# Automated Compliance Checking

## Proposals submitted in response to solicitations

Auto-compliance checks for required sections in solicited (e.g., proposal submitted in response to solicitations) effective April 24, 2015:

- **Error message if the following sections are not included**
  - Project Summary
  - Project Description
  - Budget
  - Data Management Plan
  - Mentoring Plan (if applicable)
- **Warning message if any of the following sections are not included**
  - References Cited
  - Biographical Sketch(es)
  - Budget Justification
  - Current and Pending Support
  - Facilities, Equipment and Other Resources



# Research.gov: Notifications & Requests

- Three new requests included in the Uniform Guidance must be submitted in Research.gov
  - Salaries of Administrative or Clerical Staff
  - Travel Costs for Dependents
  - Additional categories of participant support costs other than those described in 2 CFR § 200.75 (such as incentives, gifts, souvenirs, t-shirts and/or memorabilia)
- Next round of requests moving to Research.gov will take place in July 2015
- Awardees can view the status of all N&Rs in both FastLane and Research.gov



# Frequently Asked Questions Uniform Guidance-related

Visit the Policy Office website for FAQs on NSF implementation of the Uniform Guidance



The screenshot shows the NSF website's Policy Office page. The header includes the NSF logo and the tagline "WHERE DISCOVERIES BEGIN". A search bar and "QUICK LINKS" are in the top right. A navigation menu includes HOME, FUNDING, AWARDS, DISCOVERIES, NEWS, PUBLICATIONS, STATISTICS, ABOUT NSF, and FASTLANE. The main content area is titled "Policy Office" and lists the head as Jean Feldman. A paragraph describes the office's role in developing and implementing proposal and award policy. Below this, a section titled "Grants & Cooperative Agreements:" lists several items, including the PAPPG and a "NEW Frequently Asked Questions on NSF's Implementation of 2 CFR § 200" link, which is circled in red. Other links include "Policy & Guidance".

**Office of Budget, Finance and Award Management (BFA)**

**Policy Office**

**HEAD: Jean Feldman**

The Policy Office in the [Division of Institution and Award Support](#) is responsible for developing, implementing and issuing proposal and award policy for the programs of the National Science Foundation and is available to assist you with questions involving policy related issues. Questions related to specific awards should be directed to the [Division of Grants and Agreements](#).

Grants & Cooperative Agreements:

- [Proposal & Award Policies & Procedures Guide \(PAPPG\)](#), effective December 26, 2014 - the PAPPG is NSF's implementation of 2 CFR § 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)*
- **NEW** [Frequently Asked Questions on NSF's Implementation of 2 CFR § 200](#)
  - For guidance on proposals submitted or due, and awards made before December 26, 2014, continue to reference the [PAPPG dated February 2014](#)
- [Policy & Guidance](#)

[nso.gov/bfa/dias/policy/](https://nsf.gov/bfa/dias/policy/)



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# Frequently Asked Questions

## Uniform Guidance-related (Cont'd)

- Which awards incorporate the new Uniform Guidance requirements?
- How does an awardee know which terms and conditions apply an award?
- If an existing award receives a non-funding amendment, is the amendment subject to the Grant General Conditions (GC-1) dated December 26, 2014?
- If an existing award receives an amendment and the new GC-1 is incorporated, is it necessary to request a retroactive approval for items that normally require prior approvals?



# Frequently Asked Questions

## Uniform Guidance-related

- The Grant Proposal Guide states: "No supporting documentation is required for proposed rates of 10% or less of modified total direct costs." Is it therefore acceptable to allow less than 10% of modified total direct costs? If so, is 0% acceptable?
- We've received budgets from subcontractors who elect not to charge F&A at all. Is a 0% F&A rate acceptable in these cases?
- All travel must now be justified in Line E of the budget. How detailed must this request be to meet this requirement? For instance, if the name of a conference is available but not the exact date or location, is this sufficient?
- When might temporary dependent care costs be allowable?



# Administrative Burden Update on NSF Response

- Reducing Investigators' Administrative Workload for Federally Funded Research (March 2014)
- Ongoing engagement with NSF Directorates for pilot activities
- Continued engagement with federal-wide initiatives to reduce administrative workload



# Opportunity in NSF Policy Office

- Join the NSF team for a one- to two-year stint as a Policy Specialist working on proposal and award policies and procedures.
- Bring your institutional expertise to NSF and leave with an inside understanding of NSF policies.
- Applications accepted through June 26, 2015
  - [nsf.gov/pubs/2015/dias15001/dias15001.jsp?org=NSF](http://nsf.gov/pubs/2015/dias15001/dias15001.jsp?org=NSF)



# For More Information

## Ask Early, Ask Often!

[nsf.gov/staff](https://www.nsf.gov/staff)

[nsf.gov/staff/orglist.jsp](https://www.nsf.gov/staff/orglist.jsp)

[nsf.gov/about/career\\_opps/rotators/index.jsp](https://www.nsf.gov/about/career_opps/rotators/index.jsp)

