

NSF Draft Proposal and Award Policy and Procedures Guide (20-1)

https://www.nsf.gov/bfa/dias/policy/papp/pappg20_1/FedReg/draftpappg_may2019.pdf

June 2019 COGR Meeting

Washington Marriott, Washington DC

Comments due
July 29, 2019

June 7, 2019

COGR

Council On Governmental Relations

An association of research universities

NSF Draft Current and Pending Support

- Current and pending support information must be separately provided for each individual designated as senior personnel on the proposal through use of an NSF-approved format.
- Information must be provided about all current and pending support, including this project, for ongoing projects, and for any proposals currently under consideration from whatever source, irrespective of whether such support is provided through the proposing organization or is provided directly to the individual. All projects and activities, current or proposed, that require a time commitment from the individual must be reported, even if the support received is only in-kind (such as office/laboratory space, equipment, supplies, employees, students). The total award amount for the entire award period covered (including indirect costs) must be provided, as well as the number of person-months (or partial person-months) per year to be devoted to the project by the senior personnel involved.

NSF Comments

- This section has been revised to clarify NSF's longstanding requirements regarding submission of current and pending support information.
- Information must be provided for all current and pending support irrespective of whether such support is provided through the proposing organization or directly to the individual.
- § Examples of current and pending support have been expanded to include non-profit organizations and consulting agreements.
- § All projects and activities that require a time commitment must be reported (no minimum has been established), even if the support received is only in-kind.
- § NSF does not consider these clarifications to be changes in policy.
- § New electronic format (or formats) will be implemented to collect current and pending information. Upload of pdf will no longer be permitted.

Selected Themes for Comments (so far)

- Are the phrases “*ongoing projects*” and “*all projects and activities*” limited to projects and activities that are within the scope of the individual’s institutional responsibilities? Is the referenced “*consulting*” limited to consulting undertaken in an institutional capacity?
- Is requiring a “*time commitment*” the same as requiring an “*effort commitment*”? How should we report projects that clearly have time commitments (e.g., teaching, service activity) but don’t necessarily have explicit percentages of effort? Could the project be listed but the effort commitment be noted as “not applicable,” “zero pre-defined commitment,” or “as needed instead of a portion of a person-month?”

Selected Themes for Comments (so far)

- The phrase “*irrespective of whether such support is provided through the proposing organization or is provided directly to the individual*” is confusing – if a academic year faculty member gets summer employment from another employer, should that be reported?
- If support from outside the U appointment is expected to be reported, then we’ll need to exceed 100% on effort calculations – is that what NSF wants?

Who is Responsible for Accuracy and Completeness?

- *Certification for Authorized Organizational Representative (AOR) or Individual Proposer: The AOR is required to complete certifications regarding the accuracy and completeness of statements contained in the proposal, as well as to certify that the organization (or individual) agrees to accept the obligation to comply with grant terms and conditions.*
- *How can institutions assume responsibility (and liability) for data that they do not have?*

Bigger Picture Qs

- NSF says this doesn't represent a policy change – do we concur?
- Would it be better (less confusing to faculty) to acknowledge that we now have expanded requirements and instead add one or more questions that ask for the NEW information?
- **What issues or questions do you see in the NSF language that you would like COGR to consider for its comments?**