

## Report on Research Compliance Volume 19, Number 10. September 21, 2022 NSF to Delay Some 2023 PAPPG Requirements

By Theresa Defino

Calling the CHIPS and Science Act a "multi-hundred-page piece of legislation," National Science Foundation (NSF) Policy Head Jean Feldman said there are some provisions NSF officials "are jumping on right out of the box. We are spending a tremendous amount of time going over all the details, the nitty gritty details, figuring out what NSF requirements are, what changes will be made to NSF policies and procedures, what new programs, the whole nine yards."

Feldman made her remarks at a recent meeting of the Federal Demonstration Partnership (FDP). [1][2]

The law "expands the responsible and ethical conduct of research [RECR] training," making it mandatory for "both faculty and for senior personnel," Feldman added, noting Congress also specified three areas that must be addressed.

These are mentor training and mentorship; training to raise awareness of potential research security threats; and federal export control, disclosure, and reporting requirements, according to the legislation.

RECR is another new term, along with malign talent programs, with which research compliance officials will need to become familiar, thanks to the CHIPS Act.

## **Broader Training, SciENcv Effective Oct. 2023**

Currently, NSF calls this responsible conduct of research (RCR) training, and institutions are only required to provide it to undergraduates, graduates and postdoctoral researchers who receive NSF funds, which can be for salary or stipends to conduct research on NSF-funded projects. It does not specify the content of the training.

NSF will maintain its current training requirements initially. NSF will require training for faculty and senior personnel "beginning in the end of July" next year, rather than in January when other new award terms and conditions take effect, she said.

The delay should allow institutions to "get your training refined, get your systems in place so you could track these individuals," Feldman said.

Additions will be made to NSF's upcoming 2023 Proposal & Award Policies & Procedures Guide (PAPPG) to reflect the CHIPS Act and in response to comments on the draft version, which was released in April.

The final version had not been issued at the time of Feldman's FDP presentation last month. Feldman said NSF submitted the final PAPPG to the Office of Management and Budget on Sept. 7. Once approved, it will be published in the *Federal Register*. Approval and publication are expected to be sometime this month, she said.

Responding to concerns, NSF will delay the mandatory use of SciENcv in its applications, instead of adopting it when the rest of the new PAPPG goes into effect, Feldman said.

The draft PAPPG required investigators and faculty to use SciENcv for both the biographical sketch and current and pending support sections of applications and award reports. NSF planned to eliminate a "fillable format" for this information. But this provision generated opposition, and, under the final PAPPG, the requirement will be delayed until October 2023, Feldman said.

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