

Report on Research Compliance Volume 18, Number 2. January 20, 2021 NSF Invites Feedback on Revised PAPPG, Plans October Start Date

By Theresa Defino

In a change from the past, the National Science Foundation (NSF) issued a draft revised version of its awards bible just before the end of 2020, [1] and officials now say they don't expect to put it into effect until October.

Until Feb. 12, organizations can share their thoughts on the draft Proposal & Award Policies & Procedures Guide (PAPPG), Jeremy Leffler, outreach specialist in NSF's Policy Office, said during a recent Federal Demonstration Partnership (FDP) meeting. [2]

As Leffler explained, NSF is deviating from its usual schedule when it comes to the 2021 PAPPG. Typically NSF announces a draft version for comment in October, with implementation in January or February of the following year, Leffler said. (However, the current PAPPG went into effect June 1).

But now NSF, he said, is "moving to a different schedule."

NSF announced the availability of the revised PAPPG in a Dec. 14 Federal Register notice. NSF officials are "anticipating a spring 2021 release" of the final version, "with an implementation in October 2021," Leffler said. He did not indicate whether NSF plans to stick to the new schedule in the future.

Until a new PAPPG is in force, "the current PAPPG...continues to be in effect," Leffler said.

During his presentation, Leffler reviewed some proposed changes and encouraged the submission of comments. In addition to providing feedback on the draft, individuals "may also use this as an opportunity to let NSF know of any other areas of policy that you and your institutions believe NSF should consider," he said.

The following are among those Leffler discussed.

- 2 C.F.R. § 200 updates. In August, the Office of Management and Budget released a five-year update to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, also known as the Uniform Guidance, which went into effect Nov. 12. [3] PAPPG readers will see references highlighted throughout the document that have been updated to match the new Uniform Guidance, Leffler said.
- Addition of planning proposals as new proposal type. NSF will make new awards for up to \$100,000, and for up to two years, "to support the initial conceptualization, planning and collaboration activities that aim to formulate new and sound plans for larger scale projects in emerging research areas," Leffler explained. Such awards would support "future submission of a proposal to an NSF program."
- Addition of travel proposal requirements. NSF is "specifying that a meeting organizer for a travel proposal must have a written policy or a code of conduct that addresses sexual harassment, other forms of harassment and sexual assault," said Leffler, "and that includes also an accessible means for reporting violations." Such policies themselves do not have to be submitted with a proposal, he added. In response to

a question, Leffler clarified that the proposed changes to the travel proposals do not apply to "all travel proposed on any standard research."

- Addition of context language for proposal sections. NSF is proposing to add "contextual information that identifies the purpose of each section and how NSF uses the information that you're providing," Leffler explained. This effort "began with us identifying how NSF uses the biographical sketch and current pending support sections, and we've applied that to each of the required proposal sections."
- Additional clarification of current and pending support. "We have received a lot of questions on current and pending support," said Leffler, "questions about both the policy and the technical implementation of this proposal section." NSF is "incorporating additional information into the PAPPG from the frequently-asked-questions document that is published on the policy office website" to "help get more eyes on this information and to assist the community with completing this section of the proposal." He added that NSF also has made "some clarifications of funding support in the introduction section of the PAPPG."
- Clarification of types of research supported by NSF. Proposed changes, "particularly in the area of the biological sciences," provide more information about this topic, he said.
- Addition of career-life supplements. Proposed changes implement "requirements for preparation and submission of career-life balance supplements to existing awards that was laid out in the recently released NSF Dear Colleague Letter" on such supplements, Leffler said. "The Dear Colleague Letter outlines an opportunity for supplemental funding to help researchers who are confronted with a short-term increase in dependent-care responsibilities, and to ensure that research activities that are supported by an NSF award can continue."

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