

## **Frequently Asked Questions (FAQs)**

### **On Proposal Preparation and Award Administration Related to NSF *Proposal & Award Policies & Procedures Guide* (PAPPG) (NSF 23-1)**

#### **A**

##### **Assistance Listings (formerly CFDA Numbers)**

***Where can a proposer/recipient find the assistance listings associated with NSF programs?***

The applicable assistance listing number is identified in the Summary section of NSF program announcements and solicitations. Further information on NSF assistance listings can be found in the [PAPPG Introduction, Section B, Foreword](#).

***We recently received awards with two assistance listing numbers. Where can we find the amount of funds provided by each division for this award?***

The breakdown of funding is available by looking up your NSF award number on [USASpending.gov](#).

##### **Award Administration**

***Where can I find information regarding post-award issues?***

Information regarding pre-award costs, required notifications and prior approvals, extensions, transfer of the award, reporting requirements and other award administration requirements can be found by accessing the applicable award conditions. Additional information regarding the award, administration, and monitoring of NSF grants and cooperative agreements may be found in Part II of the [Proposal & Award Policies & Procedures Guide](#).

#### **B**

##### **Biographical Sketches**

**Note:** The mandate to use SciENcv only for preparation of the Biographical Sketch will go into effect for new proposals submitted or due on or after October 23, 2023. In the interim, proposers may continue to prepare and submit this document via use of SciENcv or the NSF fillable PDF. NSF, however, encourages the community to use SciENcv prior to the October 2023 implementation.

***Where can I find information on the NSF-approved formats for the biographical sketch?***

Information on NSF-approved formats for the biographical sketch is available on the [NSF-Approved Formats for the Biographical Sketch](#) website.

***Where can I find information on pre-award and post-award disclosures relating to the biographical sketch?***

Helpful reference information is contained in the table entitled [NSF Pre-award and Post-award Disclosures Relating to the Biographical Sketch and Current and Pending \(Other\) Support](#). The table identifies where these disclosures must be provided in proposals as well as in project reports.

***What types of “professional appointments” need to be identified in the biographical sketch?***

Senior personnel must only identify all current domestic or foreign professional appointments outside of the individual's academic, professional, or institutional appointments at the proposing organization.

***The PAPPG requires that publication citations in the Products section of the biographical sketch “include full citation information, including (where applicable and practicable) the names of all authors...” My citation includes multiple authors which makes it difficult to fit this information into the allotted space. Is it acceptable to include “et al.” in place of a long list of authors?***

Senior personnel that wish to include publications in the products section of the biographical sketch that include multiple authors may, at their discretion, choose to list one or more of the authors and then “et al.” in lieu of including the complete listing of authors' names. See [PAPPG Chapter II.D.2.h\(i\)](#) for complete coverage of the requirements for the biographical sketch.

***Instructions for the Biographical Sketch Products section indicate that “acceptable products must be citable and accessible.” Accessibility may be difficult to accomplish in the case of manuscripts submitted or accepted for publication and other documents and materials. Access may need to be provided through organizational or personal websites. Will that be sufficient to meet the proposal submission requirements?***

References to organizational or other websites are allowable, provided that the site is available for a reasonable percentage of the time.

**C**

**CFDA Numbers (see Assistance Listings)**

**Collaborative Proposals**

***When submitting collaborative proposals from multiple organizations, do non-lead collaborative proposal(s) have to be submitted on the same day as the lead collaborative proposal?***

While non-lead collaborative proposal(s) do not have to be submitted on the same day as the lead collaborative, [PAPPG Chapter II.E.3](#), states that all components of the collaborative proposal must meet any established deadline date, and failure to do so may result in the entire collaborative proposal being returned without review.

***Our organization is working on a proposal where we are the lead, and the non-lead is planning to work off-site/off campus for part or most of the project. Do we as the lead organization need to check the Off-Campus or Off-Site Research box on the cover sheet when we do NOT have plans to work off-site/off campus for our portion of the project?***

The lead organization must check the Off-Campus or Off-Site Research box on the cover sheet if either the lead or any non-lead organization proposes to conduct research off-campus or off-site.

***I am submitting a separately submitted collaborative proposal to a program solicitation that requires the safe and inclusive working environment plan be submitted at the time of proposal. The non-lead organization will be conducting off-campus or off-site research, however the lead will not. Which organization should upload the plan into Research.gov?***

In situations where a program solicitation requires submission of the safe and inclusive working environment plan at the time of proposal, consistent with how postdoctoral mentoring and data management plans are handled, the plan should be uploaded by the lead organization.

***How does the safe and inclusive working environment requirement apply to a collaborative submission when multiple organizations will be conducting off-campus or off-site research? Are non-lead organizations required to each have their own plan, or is a single plan sufficient for all collaborating organizations?***

The safe and inclusive working environment requirement to have a plan in place as stated in [PAPPG Chapter II.E.9](#) applies to all lead and non-lead proposals that propose to conduct research off-campus or off-site. If more than one collaborating organization proposes to conduct research off-campus or off-site, one joint plan must be developed, unless otherwise specified in a program solicitation.

***For separately submitted collaborative proposals, must each organization check the Off-Campus or Off-Site Research box on the cover sheet?***

Only the lead organization must check the box on the cover sheet if either the lead or any non-lead organization proposes to conduct research off-campus or off-site.

***We are a subawardee or have a subaward on the project, where the prime will be conducting off-campus or off-site research. Is there an expectation that the safe and inclusive working environment plan be included in the subawardee agreement if the subawardee is participating in the off-campus or off-site research?***

It is the prime's decision on whether or not the plan should be included in the subawardee agreement. Since the prime will be conducting off-campus or off-site research, they must develop a safe and inclusive working environment plan. The prime's plan must be disseminated to individuals participating in the off-campus or off-site research prior to departure, including any participating individuals from the subawardee organization.

## Collaborators and Other Affiliations (COA)

A [separate set of FAQs related to collaborators and other affiliations](#) is available on the [COA](#) website.

## Conference Proposals

***Should I include conference speaker fees in the participant support costs section of the budget?***

Speakers and trainers generally are not considered participants, therefore, costs associated with them, such as conference speaker fees, normally should not be included in this section of the budget. However, if the primary purpose of the individual's attendance at the conference is learning and receiving training as a participant, then the costs may be included under participant support.

If the primary purpose is to speak or assist with management of the conference, then such costs should be budgeted in appropriate categories other than participant support.

***Does the requirement to provide a code-of-conduct apply if funds are included for a conference or workshop in the budget of a research award or does the requirement only pertain to NSF conference proposals?***

The requirement to provide a code-of-conduct specifically pertains to NSF conference proposals. See [PAPPG Chapter II.F.9](#) for further information.

***May costs related to childcare be included on the budget for conference proposals?***

The costs of identifying, but not providing, locally available dependent care resources may be included in the proposal budget.

## Confidential Budgetary Information

***How do I indicate in my proposal if I do not want salary information to be released to people outside the Government?***

The proposing organization may request that salary data on senior personnel not be released to persons outside the Government during the review process. In such cases, the item for senior personnel salaries in the proposal may appear as a single figure and the person-months represented by that amount omitted. If this option is exercised, senior personnel salaries and person-months must be itemized in a separate statement, and forwarded to NSF in accordance with the instructions specified in [PAPPG Chapter II.E.1](#).

## Conflicts of Interest

***Where can a proposer find information on conflicts of interest (the investigator financial disclosure policy)? Does NSF provide a written sample of an organizational conflicts of interest policy?***

[PAPPG Chapter IX.A](#) provides information on NSF's conflicts of interest policy. NSF does not provide written samples of such policies.

***What are NSF's expectations for disclosure of a significant financial interest in instances where investigators<sup>1</sup> may have an equity stake in a company, but do not know who the investors in the company are?***

Investigators must disclose their equity stake. If a venture capital firm does not provide investment information, investigators must obtain a letter from the venture capital firm stating that the firm does not disclose who or what they have invested in, or who the other investors are.

## **Cost Sharing**

***What is the distinction between voluntary committed cost sharing and voluntary uncommitted cost sharing?***

As stipulated in 2 CFR §200.1, "*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." As such, to be considered voluntary committed cost sharing, the amount must appear on the NSF budget and/or budget justification, and should an award be made, would be subject to audit. Voluntary committed cost sharing is not allowed unless the NSF solicitation mandates that it be provided. A complete listing of NSF programs that require cost sharing is available on the [NSF Cost Sharing Policy section](#) of the NSF website.

Organizational resources that are necessary for, and available to, a project that are not included in the budget or budget justification are considered voluntary uncommitted cost sharing and are not subject to audit. Such information must be described in the Facilities, Equipment and Other Resources section of the proposal. While not required by NSF, recipients may, at their own discretion, contribute voluntary uncommitted cost sharing to NSF-sponsored projects.

***PAPPG Chapter II.D.2.f(viii) states that, "Except where specifically identified in an NSF program solicitation, the applicable U.S. Federally negotiated indirect cost rate(s) must be used in computing indirect costs (F&A) for a proposal." Does this mean that organizations cannot request a reduced or waived rate because this would constitute voluntary committed cost sharing?***

Yes. Unless required by an NSF program solicitation, the organization's current negotiated indirect cost rate agreement must be used in computing indirect costs for a proposal. Otherwise, foregoing full indirect cost rate recovery would be considered voluntary committed cost sharing and is therefore prohibited by NSF.

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<sup>1</sup> In this FAQ, the term "investigator" means the PI, co-PIs, and any other person identified on the proposed project who is responsible for the design, conduct, or reporting of research or educational activities funded or proposed for funding by NSF.

## Current and Pending (Other) Support

**Note:** The mandate to use SciENCv only for the preparation of Current and Pending (Other) Support information will go into effect for new proposals submitted or due on or after October 23, 2023. In the interim, proposers may continue to prepare and submit this document via use of SciENCv or the NSF fillable PDF. NSF, however, encourages the community to use SciENCv prior to the October 2023 implementation.

A [separate set of FAQs related to current and pending \(other\) support](#) is available on the NSF website.

### ***Where can I find information on the NSF-approved formats for current and pending (other) support?***

Information on NSF-approved formats for current and pending (other) support is available on the [NSF-Approved Formats for Current and Pending \(Other\) Support](#) website.

### ***Where can I find information on pre-award and post-award disclosures relating to current and pending (other) support?***

Helpful reference information is contained in the table entitled [NSF Pre-award and Post-award Disclosures Relating to the Biographical Sketch and Current and Pending \(Other\) Support](#). The table identifies where these disclosures must be provided in proposals as well as in project reports.

## D

### Data Management Plan

#### ***Where can I find information about the requirement for a data management plan?***

Information on the requirement for data management plans is available in [PAPPG Chapter II.D.2.i\(ii\)](#) and the [Dissemination and Sharing of Research Results \(NSF Data Management Requirements\)](#) website.

### Deadline Dates

#### ***What happens if a deadline date falls on a weekend or Federal holiday?***

If a deadline date falls on a weekend or Federal holiday, the deadline will be extended to the following business day. Additional information on due dates is available in [PAPPG Chapter I.F.](#)

#### ***If a proposer needs to request extension of a deadline due to a natural or anthropogenic disaster, what process should be followed?***

Proposers should contact the cognizant NSF Program Officer in the Division/Office to which they intend to submit their proposal and request authorization to submit a proposal after the deadline date. Proposers should then follow the written or verbal guidance

provided by the cognizant NSF Program Officer. Additional information on special exceptions to NSF's deadline date policy is available in [PAPPG Chapter I.F.](#)

***Where can I find information on how to submit a proposal after the deadline date if an extension has been granted due to a natural or anthropogenic disaster?***

Information on how to submit a proposal after the deadline date due to a natural or anthropogenic disaster is available in [PAPPG Chapter I.F.](#)

## **E**

### **Eligibility**

***Can an award be made to an unaffiliated individual?***

Unaffiliated individuals in the U.S. and unaffiliated U.S. citizens are not eligible to receive direct funding support from NSF. Unaffiliated individuals are strongly encouraged to affiliate with an organization that is able to meet the requirements specified in 2 CFR §200. An individual submitting a proposal to an NSF Postdoctoral Fellowship solicitation is not considered an unaffiliated individual. Additional information on unaffiliated individuals is available in [PAPPG Chapter I.E.](#)

***Can an individual who is not a U.S. citizen serve as a Principal Investigator on a proposal?***

Except for NSF fellowships, which by statute can be made only to citizens, nationals, or lawfully admitted permanent residents of the United States, there is no general policy restricting involvement on NSF awards based on nationality. A proposing organization in the U.S. may designate as Principal Investigator anyone it believes to be capable of fulfilling the role.

***Can a Federal agency apply directly for an NSF award?***

NSF does not normally support research or education activities by scientists, engineers, or educators employed by Federal agencies or Federally Funded Research and Development Centers (FFRDCs). Under unusual circumstances, other Federal agencies and FFRDCs may submit proposals directly to NSF. See [PAPPG Chapter I.E](#) for information on eligibility requirements for a Federal agency.

***Can different campuses of the same university system submit separate proposals in response to a program solicitation that limits the number of proposals to one per organization?***

NSF's stance on the definition of "organization" is that, in addition to having its own Unique Entity Identifier (UEI) and System for Award Management (SAM) registration to use NSF electronic systems, organizations must have separate Sponsored Projects Offices that have the ability to submit proposals directly to NSF. The campus would need to be listed as the awardee organization on the NSF Cover Sheet and if all of the above criteria are met, that organization would be considered independent for purposes of solicitations that have limited submissions. See [PAPPG Chapter I.G.2](#) for additional information on requirements relating to UEI and registration in SAM.

## F

### Facilities and Administrative (F&A) Costs (see Indirect Costs)

#### Fringe Benefits

##### ***Can proposers use projected fringe benefit rates when submitting budgets to NSF?***

Generally, proposers should be using their organization's currently approved fringe benefit rate for budgeting purposes.

NSF policy does allow recipients to rebudget funds within the award to cover fringe benefit costs that are finalized higher than budgeted. Therefore, if funds under the award are available, the actual fringe rates may be charged.

## H

### Harassment (NSF's Policy on Harassment)

##### ***Where can I find information on NSF's policy on sexual harassment, other forms of harassment, or sexual assault?***

Information on NSF's policy on sexual harassment, other forms of harassment, or sexual assault is available in [PAPPG Chapter XI.A.1.g](#) and on the NSF [Sexual Harassment website](#).

NSF proposers and recipients also may contact NSF's Office of Equity and Civil Rights (OECR) via email to [ProgramComplaints@nsf.gov](mailto:ProgramComplaints@nsf.gov) or at 703-292-8020 with any questions.

## I

### Indirect Costs (Facilities and Administrative (F&A) Costs)

##### ***Do indirect cost rates in effect on the proposal date remain in effect for the life of the award?***

No. For Institutions of Higher Education (IHEs) the negotiated indirect cost rate agreement (NICRA) in effect at the time of the award remains in effect for the life of the award. However, per [OMB guidance](#), if the rate(s) used in the proposal is lower than the rate(s) in effect at the time of award, recipients may charge NSF "less than the full negotiated rate" (NSF considers the under-recovery is considered voluntary uncommitted cost share). However, recipients are urged to have or establish an internal control that ensures the rates proposed are not greater than those in the approved NICRA effective at the time of award, to avoid overcharging indirect costs under NSF awards. Any overcharges identified under an NSF review (audit, site visit, etc.) will be disallowed and will require repayment.

Proposing organizations other than IHEs, however, may charge indirect costs based on newly negotiated rates in effect at the time the costs are incurred, provided this will not affect the scope, increase award costs, decrease the period of support, or otherwise be inconsistent with the indirect cost rate provisions of the award.



***Given the complex nature of the above question, can an example be provided to better illustrate the correct application of the indirect cost rate for an IHE?***

An IHE submits a proposal to NSF for consideration in April and at that time, their approved predetermined indirect cost rate is 45%. In June of that year, they negotiate a new rate with their cognizant agency. The new agreement contains the following rates:

Predetermined            July 1, 2023 through June 30, 2024    47%

Predetermined            July 1, 2024 through June 30, 2025    50%

If the proposal is funded in September, they can use the 47% rate. In fact, for any award made after July 1, 2023, they can rebudget and claim indirect costs at the 47% rate.

If, however, the rate agreement will be negotiated again in 2023 and the resulting rate agreement is more than what was previously approved, the higher rate cannot be applied to an award that was made before the effective date of the new F&A rate agreement. In accordance with 2 CFR §200, Appendix III, paragraph C.7, an IHE cannot rebudget for indirect cost rate changes negotiated after the award was made.

***[PAPPG Chapter II.D.2.f\(viii\)](#) states, “Except where specifically identified in an NSF program solicitation, the applicable U.S. Federally negotiated indirect cost rate(s) must be used in computing indirect costs (F&A) for a proposal.” Does this mean that an IHE is required to claim the entirety of its negotiated indirect cost rate?***

Once the award is made and as long as the indirect cost rates in effect at the time of award were used to calculate the proposal budget, undercharges of F&A are not monitored by NSF and would be considered voluntary uncommitted cost share.

***Is it allowable for a subrecipient to choose not to use their negotiated rate or accept less than the de minimis rate?***

A subrecipient may voluntarily elect not to use their negotiated rate or request less than the *de minimis* rate. The lead organization, however, cannot require the subrecipient to forego the use of their negotiated rate or the *de minimis* indirect cost rate. Additional information is available in [PAPPG Chapter II.D.2.f\(viii\)](#) and [OMB 2 CFR FAQs, Question 134](#).

***An organization is preparing a proposal for submission to NSF but does not have a negotiated indirect cost rate. Can the organization submit a proposal without a negotiated indirect cost rate, and if so, what indirect cost rate should be used in the proposal budget?***

In accordance with 2 CFR §200.414(f), a proposer that has never received a negotiated indirect cost rate may elect to charge a *de minimis* rate of 10% of modified total direct costs (MTDC). No supporting documentation is required for proposed rates of 10% MTDC or less.

Domestic proposing organizations that do not have a current negotiated indirect cost rate agreement with a cognizant Federal agency, and who are requesting more than a *de minimis* 10% recovery of modified total direct costs should prepare an indirect cost

proposal based on expenditures for its most recently ended fiscal year. Based on information provided in the indirect cost proposal, NSF may negotiate an award-specific rate to be used only on the award currently being considered for funding. The content and financial data included in indirect cost proposals vary according to the make-up of the proposing organization. Instructions for preparing an indirect cost rate proposal can be found on the [NSF website](#).

Additional Information on indirect costs is provided in [2 CFR §200](#) by type of recipient organization:

- [Institutions of Higher Education](#)
- [Non-profit Organizations](#)
- [State and Local Governments](#)

For Profit Organizations should consult the [Federal Acquisition Regulation \(FAR\)](#).

Foreign organizations that do not have a current U.S. Federally negotiated indirect cost rate(s) are limited to a *de minimis* indirect cost rate recovery of 10% of modified total direct costs (see [PAPPG Chapter II.D.2.f\(viii\)](#) for further information).

### **International Activities/Considerations**

#### ***Are faculty from an international branch campus of a U.S. IHE eligible to apply for NSF funding?***

Unless stated otherwise in a program solicitation, faculty from an international branch campus of a U.S. IHE are eligible to apply for NSF funding. Proposers, however, must follow the preparation instructions in [PAPPG Chapter I.E.1.a](#).

#### ***Can an award be made directly to a foreign organization?***

NSF rarely provides direct funding support to foreign organizations. In cases, however, where the proposer considers the foreign organization or foreign individual's involvement to be essential to the project and proposes to provide funding through the NSF budget (through a subaward or consultant arrangement), the proposer must explain why support from the foreign counterpart's in-country resources is not feasible and why the foreign organization or foreign individual can carry out the activity more effectively than a U.S. organization or U.S. individual (see [PAPPG Chapter I.E.2.c](#) for further information).

#### ***Can a person from a non-U.S. organization be a co-PI on a project?***

There is no general prohibition against someone from a non-U.S. organization serving as a co-PI on an NSF project. NSF does allow subawards to non-U.S. organizations and per [PAPPG Chapter II.E.3.a](#), collaborators from the subaward organization may be named as co-PIs under the prime's proposal (although that is at the discretion of the prime). Proposers should check their organizational policies regarding PI/co-PI eligibility to determine whether the organization permits non-employees to serve in this capacity. In addition, proposers should review the relevant program solicitation, if applicable, to ensure that there are no additional eligibility requirements that restrict co-PI eligibility.

## N

### New Awardees

***Where can a prospective new awardee find information on the types of documents required to be completed and submitted to NSF in order for NSF to conduct the necessary administrative and financial reviews of the organization?***

The [Prospective New Awardee Guide](#) contains information that will assist an organization in preparing documents which NSF requires to conduct administrative and financial reviews of an organization. The Guide also serves as a means of highlighting the accountability requirements associated with Federal awards.

See also [2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#).

### No-Cost Extension

***Is a PI required to provide additional effort if a 12 month no-cost extension is granted?***

Additional effort on the part of the PI beyond what was initially funded in the proposal is not implied by a no-cost extension. Generally, a no-cost extension is a rearrangement in the timing of when the effort will take place. If the PI was funded two months per year on a three year award, the PI should provide six total months over the entire award period. A 12 month no-cost extension would not increase the PI effort to 8 total months. It simply provides an additional year in which the originally proposed effort is to take place.

***If the project was awarded as a separately submitted collaborative, is the prime responsible for requesting the no-cost extension for the project or will each collaborating organization need to request a no-cost extension?***

Given that NSF makes separate awards to each collaborating organization, post-award administrative requests are considered independently for each organization. Each organization is responsible for submitting their own no-cost extension if they need additional time to complete their part of the project. Keep in mind that the organization making the request is not authorized to extend their award if it contains a zero balance.

## NSF-approved Formats

**Note:** The mandate to use SciENCv only for the preparation of the Biographical Sketch and Current and Pending (Other) Support information will go into effect for new proposals submitted or due on or after October 23, 2023. In the interim, proposers may continue to prepare and submit these documents via use of SciENCv or the NSF fillable PDF. NSF, however, encourages the community to use SciENCv prior to the October 2023 implementation.

***Where can I find information on the NSF-approved formats for the biographical sketch and current and pending support?***

Information on NSF-approved formats for the [biographical sketch](#) and [current and pending \(other\) support](#) is available on the NSF website.

## O

### Outreach

***Where can a proposer find information about NSF proposal and award-related outreach opportunities?***

Information on NSF proposal and award-related outreach opportunities is available on the [NSF Events Calendar](#) and the [Policy Office website](#). Recent presentations and webinars are available on the [Policy Office Outreach website](#).

## P

### Participant Support Costs

***Would conference/workshop costs such as breakfast, coffee, training supplies, room rental, and materials be considered participant support costs?***

Items such as breakfast, coffee, training supplies, room rental, and materials generally are not covered by participant support costs. These costs should be included on Line G6 of the NSF budget under “Other Direct Costs” (see [PAPPG Chapter II.D.2.f\(v\)](#) for further information).

***Can the cost for a student employee be budgeted in the participant support cost category?***

A student cannot be compensated partially as an employee and as a participant on the same award. It is up to the proposing organization to determine whether they should be a student employee or a participant based on the role of the student in the project. Student employees are compensated for services rendered and their level of compensation is tied to the number of hours worked. Participant support costs should be used to defray the costs of students participating in a conference or training activity related to the project.

***We would like to rebudget funding from our NSF award to move funds out of the participant support category. Do we need NSF approval to do this?***

While NSF does provide rebudgeting authority for many categories, you must receive prior approval from the cognizant NSF Program Officer to reallocate funds out of the participant support category. You may, however, rebudget funds into this category without prior NSF approval.

***May human subjects that are being paid as survey takers be considered participants?***

The participant support section of the budget may not be used to provide incentive payments to research subjects. Human subject payments should be included on Line G6 of the NSF budget under "Other Direct Costs," and indirect costs should be calculated on the payments in accordance with the organization's federally negotiated indirect cost rate.

Additional information is available on the NSF [Human Subjects website](#).

***We are preparing a Research Experiences for Undergraduate (REU) proposal. Is it acceptable to categorize students as both employees and participants if we have made the appropriate determination?***

The REU program is different in that the goal of the program is to provide a practical educational experience for undergraduate students, rather than simply a job. The role of an REU student differs from the role of a student employee because the REU program is aimed at developing the students' research skills and providing a high-quality mentoring experience. Based on this role, an REU student is considered a participant in a training activity and funds for their support should be included as a stipend in the participant support cost section of the budget.

## **Person-Months**

***What is the definition of "person-months"?***

The term "person-months" refers to the amount of time that PI(s), faculty and other senior personnel will devote to a specific project. The person-month calculation is based on the organization's regular academic-year or calendar-year. For example, if the regular schedule is 10 months and 20% effort will be devoted to the project, a total of 2 months should be listed in the academic or calendar-year field (10 months x 20% = 2 months). Organizations may have internal policies and procedures that relate specifically to the type of appointment under which an individual is employed. PIs, co-PIs, or other senior personnel should, therefore, confirm with their Sponsored Projects Office that this simplified methodology is consistent with organizational policy (see [PAPPG Chapter II.D.2.f\(i\)](#) for further information).

## Postdoctoral Researcher Mentoring Plan

### ***Where can I find information about NSF's requirement for a postdoctoral researcher mentoring plan?***

Information on NSF's requirement for a postdoctoral researcher mentoring plan is available in [PAPPG Chapter II.D.2.i\(i\)](#).

### ***Can a postdoctoral researcher mentoring plan be corrected through the Proposal File Update module?***

For proposals submitted via Research.gov, a revised postdoctoral researcher mentoring plan can be uploaded via the Proposal File Update module in Research.gov. For proposals submitted via FastLane, if a proposer discovers that a postdoctoral researcher mentoring plan needs to be corrected, the proposal must be withdrawn and resubmitted prior to the deadline.

### ***Is a postdoctoral researcher mentoring plan required if a postdoctoral researcher will be listed as senior personnel on a proposed project/proposal?***

If a postdoctoral researcher is listed in section A of the NSF Budget, and is functioning in a senior personnel capacity (i.e., responsible for the scientific or technical direction of the project), a postdoctoral researcher mentoring plan is not required.

### ***I would like to add a postdoctoral researcher after the award has been made. Do I need to notify NSF or request approval?***

If your original proposal did not include a mentoring plan, then you must send the cognizant NSF Program Officer the requisite mentoring plan, as described in [PAPPG Chapter II.D.2.i\(i\)](#). If you are requesting supplemental funding to support the postdoctoral researcher, the guidance in [PAPPG Chapter VII.B.5](#) should be followed. In either case, the PI must report on the mentoring activities provided to the individual in the annual and final annual project reports.

## Prior Approval Requirements

### ***What types of post-award actions require prior approval from NSF?***

Unless otherwise stated in the award notice or the applicable award terms and conditions, IHEs and non-profit organizations must obtain NSF prior written approval as specified in the [Research Terms and Conditions Appendix A Prior Approval Matrix](#). State and local governments and for-profit organizations must obtain NSF prior written approval as specified in the [NSF Prior Approval Matrix for State and Local Governments and For-Profit Organizations](#). See also [PAPPG Chapter X.A.3](#) for additional information.

## R

### Reconsideration

#### ***Where can I find information about NSF's reconsideration process?***

Information on NSF's reconsideration process, including the categories of actions that are subject to the NSF reconsideration policy, is available in [PAPPG Chapter IV.D](#).

### Research Performance Progress Report (RPPR)

#### ***What is the RPPR and where can I find information about it?***

The RPPR is a uniform format that Federal agencies use for reporting performance on the progress of Federally-funded research projects and research related activities. Having a uniform format directly benefits award recipients by standardizing the types of information required in performance reports and ultimately reduces their administrative effort and costs. NSF recipients use Research.gov for the preparation and submission of annual and final annual project reports that provide NSF with information about award accomplishments, publications/products that were created, participants and organizations that were involved, the impact of the research and any changes or problems associated with the award.

Additional information is available on the [Research.gov About Project Reports website](#).

### Responsible and Ethical Conduct of Research (RECR)

**Note:** The requirement specified in Section 7009 of the America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science (COMPETES) Act (42 USC 1862o-1), as amended, to have a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to faculty and other senior personnel who will be supported by NSF to conduct research will go into effect for new proposals submitted or due on or after July 31, 2023. NSF, however, encourages the community to establish such training and oversight for faculty and other senior personnel prior to the July 31, 2023, implementation. In the interim, proposers must continue to meet the guidance specified in PAPPG Chapter IX.B.

#### ***Where can a proposer find information about NSF's RECR policy?***

Information about NSF's RECR policy, including links to important documents, is available on the [RECR website](#).

#### ***For proposals submitted or due on or after July 31, 2023, does the RECR requirement apply only to faculty and other senior personnel who receive salary support on an NSF award?***

Yes, the updated RECR policy applies only to faculty and other senior personnel who receive support from salary and/or stipends to conduct research on NSF awards.

***Is there required content that must be included in the training for faculty and other senior personnel?***

Yes, the training must include mentor training and mentorship.

***Is online training sufficient, or does NSF expect that online training will be accompanied by in-person RECR instruction?***

Each organization is responsible for the development of its own RECR training program. NSF believes that the research community is best placed to determine the content and delivery method of RECR training, therefore NSF does not prescribe the form that this training should take.

## **S**

**Safe and Inclusive Working Environments for Off-Campus or Off-Site Research (see also Collaborative Proposals)**

***What constitutes off-campus or off-site research? Under what circumstances would a location be considered off-campus or off-site?***

For purposes of the safe and inclusive working environment requirement, off-campus or off-site research is defined as data/information/samples being collected off-campus or off-site, such as fieldwork and research activities on vessels and aircraft. It is an organization's responsibility to establish what constitutes an off-campus or off-site location. Once an organization has developed the criteria that will be used to make such a determination, they must apply the definition consistently across their portfolio of NSF proposals and awards.

***For projects that propose to conduct research off-campus or off-site, must the safe and inclusive working environment plan for that proposal be completed and on file with the proposing organization prior to proposal submission?***

Yes, the plan for that proposal must be completed and on file prior to submission. By signing the cover sheet, the AOR is certifying there is a safe and inclusive working environment plan in place for that proposal.

***Does the requirement to have a safe and inclusive working environment plan apply to supplemental funding requests?***

The requirement does not apply to supplemental funding requests.

***Must the safe and inclusive working environment plan be submitted to NSF at the time of proposal submission or post-award, should the proposal be funded?***

The plan does not need to be submitted to NSF for review, unless otherwise specified in the program solicitation, or requested by NSF.



## Senior Personnel Salary

### ***Does the two-month salary rule apply to all senior personnel or only to faculty on academic appointments?***

The salary policy contained in [PAPPG Chapter II.D.2.f\(i\)](#) applies to all senior personnel listed on the NSF budget.

### ***Where can the PI describe the time the PI will spend on a project if salary is not requested?***

This information must be included in the Facilities, Equipment and Other Resources section of the proposal. See [PAPPG Chapter II.D.2.g](#) for further information.

### ***Must recipients request prior NSF approval if making a change post-award to the amount originally budgeted for senior personnel salary?***

Under normal rebudgeting authority, a recipient can internally approve an increase in person months devoted to the project after an award is made, even if doing so results in salary support for senior personnel exceeding the two-month salary rule. No prior approval from NSF is necessary. The caveat is if the change would cause the objectives or scope of the project to change, then the recipient would have to submit an approval request via Research.gov.

### ***Is it possible to remove the PI or other senior personnel from the proposal budget?***

If no person months and no salary are being requested for senior personnel, they should be removed from section A of the budget. Their name(s) will remain on the Cover Sheet and the individual(s) role on the project should be described in the Facilities, Equipment, and other Resources section of the proposal. See [PAPPG Chapter II.D.2.g](#) for additional information.

### ***If PIs can be taken off the budget, does this mean that there is no minimum effort requirement for PIs on NSF-sponsored projects?***

Recipients must follow the provisions in OMB M-01-06, “Clarification of OMB A-21 Treatment of Voluntary Uncommitted Cost Sharing and Tuition Remission Costs,” regarding requirements for committing and tracking “some level” of faculty (or senior researcher) effort as part of the organized research base.

## Synergistic Activities

### ***Are multiple components allowed in the synergistic activities section of the biographical sketch?***

NSF policy ([PAPPG Chapter II.D.2h\(i\)\(a\)\(6\)](#)) allows for up to five distinct examples of synergistic activities. Each item must be one activity and must not be followed by a listing of additional sub-activities. For example, it is acceptable to summarize that the PI served on ten review panels, however, the PI must not list the specific panels for that distinct example.

## **System for Award Management (SAM)**

***I understand that a proposer must be registered in SAM, however does that requirement also apply to subrecipients?***

While each proposer must be registered in the SAM database prior to submission of the proposal, subrecipients named in the proposal do not need to be registered in SAM.

## **T**

### **Travel**

***I will be flying to a location that does not have a city pair fare with my starting destination, but I will change planes in a city that does have a city pair fare with my final destination. Am I required to fly a U.S.-flag carrier for the part of the trip that has a city pair fare?***

The requirement is only that the recipient determines if there is a city pair fare between the starting airport and the final destination airport. If there is no city pair between the starting airport and the final destination, the traveler could fly the entire way on a foreign-flag air carrier or part of the way on a U.S.-flag air carrier and part of the way on a foreign-flag air carrier.

***Can I charge temporary dependent care costs while I am in a travel status to my NSF award?***

Temporary dependent care costs above and beyond regular dependent care that directly result from travel to conferences are allowable costs provided that the conditions established in 2 CFR §200.475 are met.

***Are visa fees (including H1B visas) allowable as a direct cost on NSF awards?***

NSF's position on the allowability of direct charging visa costs is consistent with 2 CFR §200.463. This section defines short-term in connection with short-term travel visas and states that these costs generally are allowable expenses that may be proposed as a direct charge. These costs should be included on Line G6 of the NSF budget under "Other Direct Costs".

2 CFR §200.463 also makes the distinction between short-term travel visas and longer-term, immigration visas. The costs associated with longer-term, immigration visas are not allowable as direct charges. Fees, including need for expediting, related to an H1B immigration visa, therefore, cannot be charged directly to an NSF award.

## **Tuition Remission**

### ***What is NSF's policy on treatment of tuition remission?***

NSF is aware that there is variation in how IHEs charge tuition. Proposers, therefore, should budget tuition remission consistent with their established, documented cost allocation policies, which must comply with the Uniform Guidance.

## **U**

### **Uniform Resource Locators (URLs)**

#### ***May URLs be included within the Project Description? What about in other sections of the proposal?***

URLs must not be used in the project description. See [PAPPG Chapter II.D.2.d\(ii\)](#). URLs may be used in the other sections of the proposal. PIs are advised, however, that reviewers are under no obligation to view the URL site(s).