

# Proposal & Award Policy Newsletter

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## PAPPG – Proposed Significant Changes

The Proposal & Award Policies & Procedures Guide (PAPPG) provides guidance on NSF policies and procedures for proposals to, and awards from NSF. The annual revision and implementation of the PAPPG is currently underway. NSF published a draft “for comment” version in the Federal Register this past spring and comments from the community were accepted until July 24th. The Policy Office in the Division of Institution and Award Support (DIAS) is currently reviewing and responding to all comments, and expects to issue a final version of the guide this fall. Per NSF standard practice, the community receives a full 90 days to review the significant changes prior to the document taking effect. The current draft PAPPG is available on the NSF website and a summary of the significant changes and clarifications to this version is provided below.

### Proposed Revision of Eligibility Standards

NSF has revised eligibility standards by adding the new subcategory Institutions of Higher Education (IHE). Special instructions have been added for international branch campuses of IHEs. Specifically, if a proposal includes funding to be provided to an international branch campus of a U.S. institution (including through use of subawards and consultant arrangements), the proposer must explain the benefit(s) of performing (part or all) of the project at the international campus. Further, the proposer must justify why the project activities cannot be performed at the U.S. campus.

Foreign organization eligibility will be revised so that the proposer must demonstrate that one or more of the following criteria will be met:

- The foreign organization contributes a unique organization, facilities, geographic location and/or access to unique data resources not generally available to U.S. investigators (or which would require significant effort or time to duplicate), or other resources that are essential to the success of the proposed project
- The organization to be supported offers significant scientific and engineering education, training or research opportunities to the U.S.

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## Contact

Contact the Division of  
Institution and Award  
Support Contacts via  
e-mail at [policy@nsf.gov](mailto:policy@nsf.gov);  
or by phone at 703.292.8243

## Links

[Proposal & Award Policies  
& Procedures Guide \(PAPPG\)](#)

[FAQs on Proposal Preparation  
& Award Administration](#)

[NSF Grants Conference](#)

[Presentations from Recent  
Events](#)

*This issue showcases images from  
CISE – one of the many research  
and education areas funded by  
NSF. SOURCE: <https://www.nsf.gov/news/mmg/>.*

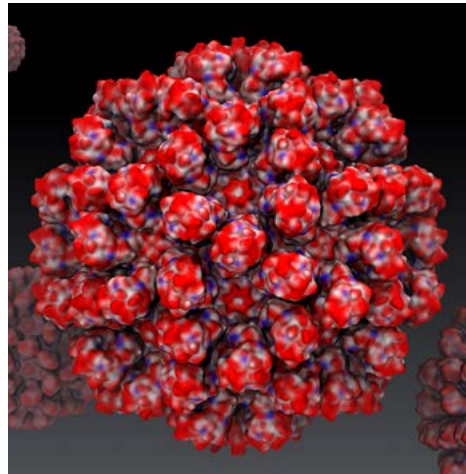
# The Newly Revised Common Rule for the Protection of Human Subjects

In 1991, the Common Rule (45 CFR 690) for the Protection of Human Subjects was published in the Federal Register and became law. The “Common Rule,” as it is usually abbreviated, is the baseline for research ethics involving human subjects for the 17 Federal agencies that are covered under the law. In the years following its promulgation, there have been significant technological advances (e.g., the mapping of the human genome, the digital revolution) that have fundamentally changed the scope of human subjects. Beginning in 2011, the agencies covered by the Common Rule initiated the process of modernizing it, so that the Institutional Review Boards (IRBs), which are responsible for reviewing and approving research protocols, would devote their time and efforts consonant with the degree of risk involved in each study.

After six years of interagency deliberations and the review of thousands of public comments, a new Common Rule was published in the Federal Register on January 19, 2017. Most parts of the rule are scheduled to go into effect on January 19, 2018, assuming the current administration does not exercise its right to roll back the revisions. In addition, there may be some delay given the challenges in establishing clarity of process with the new regulations. Common Rule agencies are in the process of coordinating the development of appropriate guidance for researchers and IRBs.

There are several significant changes in the new regulation. First, four sets of activities are now “excluded” from the definition of “research”: scholarly and journalistic activities

that focus on a specific individual (such as oral history); public health surveillance activities conducted by a public health authority; information that is collected for criminal justice purposes; and operational activities conducted for national security purposes.



The categories of “exempt” research have been expanded and revised. The new rule will include eight exemptions (rather than the current six).

**Exemption 1**, which covers normal educational practices in educational settings, includes new restrictions related to activities that might adversely impact a student’s learning environment, or the assessment of instructors in that learning environment.

**Exemption 2**, relating to low risk interactions where information cannot be easily linked back to the research subject, remains largely unchanged, although it has been expanded to include some forms of identifiable information collected, which are subject a process of “limited IRB review.”

The old **Exemption 3**, which covers research on public officials, has been removed (most activities related to

this would be covered under the revised language in Exemption 2), and replaced with provisions for activities involving benign behavioral interventions where either the information collected cannot easily be traced back to the subject, or the disclosure of that information would not place the subject at risk of harm.

**Exemption 4**, related to the secondary use of identifiable private information or biospecimens, has been revised to remove a requirement that these materials be existing.

**Exemption 5**, related to public benefit and service programs, has been expanded.

**Exemption 6**, on taste and food quality evaluation, is unchanged.

Two new exemptions have been added – **Exemption 7** related to the storage or maintenance of identifiable private information or biospecimens for secondary research, and **Exemption 8** regarding secondary research using identifiable private information or biospecimens – that require broad consent measures for the secondary use of biospecimens.

The exemptions related to identifiable information (7 and 8, and parts of 2 and 3) will be subject to a process of “limited IRB review.”

Among the other major changes to the rule, projects that have undergone expedited review no longer require a continuing review. And in 2020, the use of a single IRB for U.S. institutions conducting cooperative research in the U.S. will be mandated, though agencies supporting or conducting human

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## Faculty Salary Policy – The Two Month Rule

One of the most discussed topics at NSF outreach events is NSF's policy on faculty salary compensation. NSF's longstanding faculty salary compensation policy states that compensation for senior project personnel is generally limited to "no more than two months of their regular salary in any one year. This limit includes salary compensation received from all NSF-funded grants... If anticipated, any compensation for such personnel in excess of two months must be disclosed in the proposal budget, justified in the budget justification, and must be specifically approved by NSF in the award notice budget."

This policy takes into consideration that faculty at Institutions of Higher Education (IHEs) are already being paid to conduct research as one of the normal functions of their appointment. In addition to the compensation they are receiving for time spent on research within their regular organizational salary, NSF will reimburse senior personnel for up to two months of their salary in any one year.

Once NSF makes an award, the grantee has full responsibility for the conduct of the project and for the results that are achieved. Grantees are further required to comply with Federal requirements for prudent award management including documenting organizational reviews or approvals to ensure that expenditures are allowable, necessary and reasonable for any proposed action. Provided there is not a change in objective or scope, or reallocation of funds that were previously approved for participant support (PAPPG, Chapter X.B.1a), NSF grants awardees the authorization to transfer funds from one budget category to another for allowable expenditures including funds for faculty salary. No prior approval from NSF is necessary. If the budgetary change would cause the objectives or scope of the project to change, the grantee would be required to submit a request to NSF for approval. Since salary can amount to a large part of the budget, there

may very well be a scope change with addition of salary, especially if, for example, the PI decided not to hire a graduate student(s) to have enough money to cover the increased salary.

This policy applies to all senior personnel listed on the NSF budget, not just faculty on academic appointments.

It is also acceptable for senior personnel to commit time and resources to a project without requesting salary. In this case, an aggregated description of the resources that will be provided, should the proposal be funded, should be included in the Facilities, Equipment and Other Resources section of the proposal. That description should be narrative in nature and must not include quantifiable financial information. This is considered voluntary uncommitted cost sharing, which is permissible on NSF proposals.

Still have questions on faculty salary compensation? Send an e-mail to [policy@nsf.gov](mailto:policy@nsf.gov).



# Collaborators and Other Affiliations Pilot – FAQs

This spring, NSF began piloting use of a spreadsheet template for submission of Collaborators and Other Affiliations (COA) information. While the draft PAPPG does implement this pilot activity, and the change will go into effect for proposals submitted or due beginning next year, we have been fielding a number of questions from the community. Additional information about the pilot program is available on the [NSF website](#). If you don't see the answer to your question below, please send it to us at [policy@nsf.gov](mailto:policy@nsf.gov).

**Q: In Table B of the COA template on the NSF website does the "P" for Graduate advisor also include a Master's advisor (since Ph.D. advisor is already specified as "G")?**

A: Graduate advisors means the individual's own advisors other than

PhD advisors. It does not include advisees. Ph.D. advisor means persons with whom the individual has had an association as a Ph.D. advisor. It includes advisees but not the Ph.D. advisors of the individual.

**Q: I understand that co-editors should be named; however, I have a faculty member who is a Chief Editor for a journal. Would all Associate/Assistant Editors of the journal be considered his or her co-editors?**

A: Yes, Chief Editors should list all of the Associate/Assistant Editors. The Associate/Assistant Editors, in turn, would always list their Chief Editor.

**Q: On the spreadsheet, Table B indicates that supervised master's students can be listed in Table C. There is no indicator, however, of which code to use for these**

**students. Could you please advise which code for Table C I should use to designate master's students?**

A: It would fall under the generic "C" for collaborators on Table C.

**Q: In previous versions of the COA, instructions required that each PI, co-PI and other senior project personnel provide a list of their postdoctoral scholar sponsor(s) (from the past 5 years). Does this information need to be included in the current COA?**

A: Submission of information on postdoctoral scholar sponsors is no longer required.

**Q: Must the information requested for each section be in alphabetical order?**

A: No, you do not need to list the information alphabetically. ■

## Subscribe! Want to subscribe to this newsletter? There are a couple of ways to do this.

### NSF Updates

The NSF Update mechanism allows you to choose to be notified on many types of information about NSF programs, policies and events. To do this, navigate to <https://www.nsf.gov>, and click on the envelope icon in the "Follow Us" section of the website. After entering your e-mail address, you can select all the various topics you're interested in learning about. **To receive this newsletter, check the boxes for Newsletters/Journals and Publications: Policies and Procedures.**

### Grants Conference and Events Website

You may also sign up to be notified about this newsletter and future policy outreach opportunities on the NSF Grants Conference website. To do this, navigate to <https://nsfgrantsconferences.com/> and click "Get Notified."

We hope you continue to enjoy this newsletter and share it with your colleagues!

### Continued from page 2 – Human Subjects

subjects research do have the power to determine that single IRB is not appropriate for a particular context.

There is further action required to clarify these changes for our research communities. The process of "limited IRB review" will need to be defined and differentiated from "expedited" review. In addition, since there are analytic technologies that may have the capacity to generate identifiable private information or identifiable biospecimens, Common Rule agencies will need to coordinate on how to best establish a process of assessing those technologies. We also will need to clarify who has the capacity to make determinations of exemption. We plan to have new guidance posted to the NSF Human Subjects webpage before the rollout of the new Common Rule in 2018.



## Project Reporting Policies and Reminders

Project reporting is required for all awards made by NSF. These reports provide program and administrative offices with information on the progress of supported projects and how the funds are used in support of those projects. There are three types of required reports for all NSF assistance awards: Annual Reports, Final Reports and the Project Outcomes Report for the General Public (POR). Annual and Final project reports must be approved by the cognizant NSF Program Officer, while the POR does not receive NSF review or approval. Annual Reports are due 90 days prior to the end of the current budget period, while Final Reports and the POR are due 120 days after the end date of the award. Complete guidance on project reporting requirements is in the PAPPG, Chapter VII.D.

Project reporting is not only essential to provide updates to NSF on the progress of NSF funded grants, failure to submit them in a timely manner can have wide-reaching effects on Principal Investigators (PIs) and co-Principal Investigators (co-PIs).

Consequences for an overdue project report includes no future funding for the PI and all associated co-PIs. In addition, no administrative functions can be performed on awards that have overdue reports. For example, a PI or co-PI with overdue project reports will be unable to submit a no-cost extension for their award(s).

Reminder notices for all reports are sent to the PI, any co-PIs, as well as the Sponsored Projects Office (SPO) contact(s) at the organization. However, only the PI and any co-PIs may submit reports in Research.gov. The SPO does have the ability

to run reports for their organization to display awards with due and overdue project reports. Questions about the content of a report should be directed to the cognizant NSF Program Officer. Additional technical details regarding preparation and submission of reports are available in [Research.gov](https://www.research.gov).

It is important to note that, the [Grant Oversight and New Efficiency \(GONE\) Act](https://www.gone.gov) requires Federal agencies to submit a report to Congress of all Federal grant awards that expired on or before September 30, 2015 that are not closed. NSF is unable to close awards that have overdue project reports. Awards to institutions with project reports more than two years overdue will be reported to Congress on November 15, 2017, in accordance with the GONE Act. NSF will issue letters informing institutions of awards that fall into this category. ■

## Upcoming NSF Outreach

### Fall 2017 NSF Grants Conference

The next NSF Grants Conference will be held November 13-14 in Phoenix, Arizona. Further information is available on the [NSF Grants Conference website](https://www.nsf.gov/grants-conference). Registration for this conference will open the week of September 4th. In addition, NSF plans to provide a live webcast of the plenary sessions. Visit the NSF Grants Conference website for additional details.

### PAPPG Webinars

NSF will conduct live webinars in the Fall to discuss the changes to the Proposal & Award Policies & Procedures Guide. Stay tuned for additional details. To be notified of all NSF outreach opportunities, navigate to the [NSF Grants Conference website](https://www.nsf.gov/grants-conference) and click, "Get Notified." ■



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### Collaborators and Other Affiliations (COA) Template Implementation

With the draft PAPPG, NSF is planning to implement the required use of the COA template. NSF uses collaborator and other affiliation information during the merit review process to help manage reviewer selection. COA information must be provided separately for each individual identified as senior project personnel. The guidance provides specific detail on the types of collaborations that must be identified in the template. See the article below that covers frequently asked questions regarding the new COA template and process.

### New Single Copy Document on Proposal Submission by Former NSF Staff

The draft PAPPG contains new coverage that addresses proposal submission by former NSF staff. It is important to note that for one year following separation from the Foundation, any communication with NSF by a former employee must be done via a “substitute negotiator.” Information about the substitute negotiator must be provided as part of the proposal via a single copy document.

### New Header Requirement in the Project Description

The draft PAPPG now specifies that the Project Description for proposals submitted to NSF must include a separate section within the narrative labeled “Intellectual Merit.” This mirrors the current requirement to have a separate section labeled “Broader Impacts.”

### Results from Prior NSF Support Clarification

NSF clarified the language in the Results from Prior NSF Support section of the draft PAPPG to indicate that if any PI or co-PI

identified on the proposal has received NSF support through an award with an **end date** in the past five years or in the future (including any current funding and no cost extensions), information on the award is required for each PI and co-PI, regardless of whether the support was directly related to the proposal or not.

### Organizational Responsibility to Define “Year” for Senior Personnel Salaries

NSF’s senior personnel salary policy states that “NSF limits the salary compensation requested in the proposal budget for senior personnel to no more than two months of their regular salary in any one year.” The draft PAPPG now also clarifies the point that it is the organization’s responsibility to define and apply the term “year.” For further discussion on the NSF’s Faculty Salary Policy see the *Faculty Salary Policy – The Two Month Rule* article on page 3.

### Vertebrate Animals

The draft PAPPG includes additional language that reflects a new award-specific condition regarding an organization’s responsibilities for projects that involve vertebrate animals. More specifically, the award condition states that it is the grantee’s responsibility to ensure that the Institutional Animal Care and Use Committee (IACUC) approval remains valid at all times that animal work is conducted under the award. It further states that additional IACUC approval must be obtained if the protocols have changed substantively from those originally proposed and approved.

### Human Subjects

Several proposed changes and clarifications were made to guidance on human subject research. The draft PAPPG now references eight categories of research that qualify

## NSF is Moving!

As you read this, NSF is knee-deep in boxes as we prepare to begin a six-week phased move to our new location in Alexandria, Virginia. The move begins at the end of August and finishes October 1st. Beginning October 2nd, the new NSF mailing address will be:

**National Science Foundation  
2415 Eisenhower Avenue  
Alexandria, VA 22314**

During the phased move, you may experience delayed response times when trying to communicate with NSF staff. Staff email addresses and phone numbers will remain the same and will continue to be accessible on the NSF website.

for exemption to Institutional Review Board (IRB) approval. In addition, it now includes the new award-specific condition that it is the organization’s responsibility to ensure that an IRB approval for human subjects work remains valid at all times that such work is being conducted. Like the vertebrate animals’ guidance, IRB approval must be obtained if the protocols have changed substantively from those originally proposed and approved. Further direction has been added regarding supplemental funding: it does not require a separate IRB approval letter unless the scope of the project has substantively changed.

### Dual Use Research of Concern

New proposed language has been added regarding NSF funded research with certain high-consequence pathogens and toxins. Organizations are now responsible for identifying life science proposals that could be potentially considered dual use research of concern. NSF will not consider funding research that would lead to a gain of function for agents of concern. ■