Significant Changes and Clarifications to the NSF Proposal and Award Policies and Procedures Guide (PAPPG)

Effective January 30, 2017, a new PAPPG will be in place. The following provides the general overview (as reflected on the NSF website) of the changes.

**Overall Document**

The PAPPG has been modified in its entirety, to remove all references to the Grant Proposal Guide (GPG) and Award & Administration Guide (AAG). The document will now be referred to solely as the NSF Proposal & Award Policies & Procedures Guide (PAPPG). The document will be sequentially numbered from Chapter I-XII and all references throughout have been modified to reflect this change. Part I of the document covers NSF’s proposal preparation and submission guidelines, and Part II covers NSF’s award, administration and monitoring guidelines.

Editorial changes have been made to either clarify or enhance the intended meaning of a sentence or section or ensure consistency with data contained in NSF systems or other NSF policy documents. Throughout the PAPPG, website references and Division or Office names have been updated to reflect current information.

**Significant Changes to the PAPPG Part I**

Chapter I.D.1, *Letters of Intent* (LOI), includes additional language regarding the submission of a LOI for collaborative proposals. Proposers that plan to submit a collaborative proposal from multiple organizations should submit a single LOI for the entire project, given that NSF considers a collaborative proposal to be a unified research project.

Chapter II.B, *Format of the Proposal*, has been updated to include two new types of proposals, RAISE and GOALI. These two types of proposals are described in greater detail in Chapter II.E. An additional resource has also been added to this section with information on NSF auto-compliance checks that are conducted during the proposal preparation and submission process.

Chapter II.C.1.e, *Collaborators & Other Affiliations Information*, includes additional instructions for proposers. Each section of the Collaborators & Other Affiliations Information should be listed alphabetically by last name. The text has also been revised to remove the requirement that proposers list postgraduate scholar sponsors in this section of the proposal. Postgraduate scholar sponsor is not a disqualifying relationship for a reviewer, therefore, it was determined that this information is not necessary.

Chapter II.C.2, *Sections of the Proposal*, has been revised to inform proposers that proposal preparation for RAPID, EAGER, RAISE, GOALI, Ideas Lab, FASED, Conference, Equipment, Travel, Center, Research Infrastructure and Fellowship projects may deviate from the content requirements of a full research proposal.
Chapter II.C.2.a, *Cover Sheet*, has been updated to provide instructions that more closely follow the proposal preparation screens in Fastlane.

Chapter II.C.2.d(iii), *Results from Prior NSF Support*, includes revised language to clarify NSF’s purpose for collecting this information in the Project Description. The purpose of the Results from Prior NSF Support section is to assist reviewers in assessing the quality of prior work conducted with current or prior NSF support. Additional instructions have also been added regarding the type of information that should be included for projects that have been recently awarded, where no new results exist.

Chapter II.C.2.g(vi), *Other Direct Costs*, has been updated to include information on incentive payments, for example, payments to human subjects or incentives to promote completion of a survey. These costs should be included on line G6 of the NSF Budget and should be proposed in accordance with organizational policies and procedures. Indirect costs should be calculated on incentive payments in accordance with the organization’s approved US Federally negotiated indirect cost rate(s).

Chapter II.C.2.g(x), *Fees* (Line K on the Proposal Budget), has been added to provide instructions for use of the Fee line on the NSF budget, which is available for use only by the SBIR/STTR programs.

Chapter II.C.2.j, *Special Information and Supplementary Documentation*, has been updated to include language that informs submitters of the type of information that may be requested by NSF in order to comply with Federal environmental statutes, including, but not limited to, the National Environmental Policy Act, the National Historic Preservation Act and the Endangered Species Act.

Chapter II.D, *Special Processing Instructions*, has been revised to address areas where special proposal processing may be required. Information on RAPID, EAGER, Ideas Lab, FASED, Equipment, Conference, and Travel Proposals has been moved to Chapter II.E.

Chapter II.D.5, *Proposals Involving Human Subjects*, has been updated to reflect NSF’s implementation of 45 CFR 690.118 in regard to applications and proposals lacking definite plans for involvement of human subjects. A hypertext link is provided to an NSF-approved format that may be used to submit such determinations by proposing institutions. Clarification has also been added regarding the IRB documentation that NSF must have in order to make an award when proposals involve human subjects.

Chapter II.E, *Types of Proposals*, has been added to describe, in one place, the various other types of proposals that can be submitted to NSF, including the two new types, RAISE and GOALI. This section includes proposal preparation instructions for each of the types of proposal that may supplement or deviate from the guidance provided elsewhere in Chapter II.

Chapter II.E.9, *Travel Proposal*, has been updated from "International Travel Proposals" to "Travel Proposal" to reflect that this type of proposal can be used for both domestic and international travel requests. Additional proposal preparation instructions have also been added to inform proposers of the required proposal elements, including the requirement that the Project Description contain Results from Prior NSF Support.
Clarifications and Other Changes to the PAPPG Part I

Chapter I.E, *Who May Submit Proposals*, includes additional language clarifying that unaffiliated individuals rarely receive direct funding support from NSF, because recipients must be able to demonstrate their ability to fully comply with the recipient requirements specified in 2 CFR § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance). As such, unaffiliated individuals are strongly encouraged to affiliate with an organization that is able to meet the requirements specified in 2 CFR § 200.

Chapter I.F, *When to Submit Proposals*, has been revised to include additional instructions on how to submit proposals under the Special Exception to NSF’s Deadline Date Policy. This section includes proposal preparation instructions for organizations impacted by a natural or anthropogenic disaster. Impacted proposers must check the “Special Exception to the Deadline Date Policy” box on the NSF Cover Sheet and upload the requisite Single Copy Document(s).

Chapter II.C.2, *Sections of the Proposal*, has been amended to include k. Single Copy Documents in the list of the required components of a full research proposal.

Chapter II.C.2.f(i), *Biographical Sketch(es), Senior Personnel*, has been revised to reflect that Fastlane no longer accepts the Biographical Sketch inserted as text. The Biographical Sketch for each senior personnel must be uploaded as a single PDF file associated with that individual.

Chapter II.C.2.g(i)(a), *Senior Personnel Salaries & Wages Policy*, has been amended to include a reference to 2 CFR § 200.430(i) to assist proposers in locating the specific requirements relevant to the documentation of effort.

Chapter II.C.2.g(iii), *Equipment* (Line D on the Proposal Budget), includes an additional reference to 2 CFR § 200.313 to assist proposers in locating the specific requirements of relevance in the Uniform Guidance.

Chapter II.C.2.g(iv)(b) *Domestic Travel*, has been revised to inform proposers that travel, meal and hotel expenses of grantee employees who are not on travel status are unallowable. Additional language has also been added stating that costs of employees on travel status are limited to those specifically authorized by 2 CFR § 200.474.

Chapter II.C.2.g(viii), *Indirect Costs* (also known as Facilities and Administrative Costs (F&A) for Colleges and Universities) (Line I on the Proposal Budget), has been updated to clarify that the use of an indirect cost rate lower than the organization’s approved negotiated indirect cost rate is considered a violation of NSF's cost sharing policy.

Chapter II.C.2.g(xii), *Voluntary Committed and Uncommitted Cost Sharing*, has been amended to include an additional reference to 2 CFR § 200.99, definition of voluntary committed cost sharing. Clarifying language has also been added to emphasize how voluntary committed and voluntary uncommitted cost sharing are treated differently by NSF. In accordance with the Uniform Guidance, in order to be considered voluntary committed cost sharing, the amount must appear on the NSF budget, and be specifically identified in the approved NSF budget. Voluntary uncommitted cost sharing, however, should not be included in the proposal budget or budget justification and these resources are not financially auditable by NSF.
Chapter II.C.2.g(xiii)(a), *Entertainment*, includes an additional reference to 2 CFR § 200.438 to assist proposers in locating the specific requirements of relevance in the Uniform Guidance.

Chapter II.C.2.j, *Special Information and Supplementary Documentation*:

has been updated to clarify where the "Mentoring Plan" and "Data Management Plan" should be uploaded in the Supplementary Documentation section of Fastlane.

includes additional language to emphasize the importance of submitting letters of support only when specifically required by a program solicitation.

has been amended to reflect changes in requirements for Antarctic proposals. Antarctic proposals to any NSF program require "Logistical Requirements and Field Plan" supplementary documentation to be submitted with the proposal.

Chapter II.D.3.b, *Submission of a collaborative proposal from multiple organizations*, has been updated to include the Collaborators & Other Affiliations Information in the list of required sections for a collaborative proposal. The Collaborators & Other Affiliations Information should be separately provided by the lead and non-lead organization(s) in a separately submitted collaborative proposal.

Chapter II.D.4, *Proposals Involving Vertebrate Animals*, has been revised to enhance clarity on the use of vertebrate animals for research or education on NSF supported projects. The revised language in this section states that any project proposing the use of vertebrate animals for research or education must comply with the provision in PHS Assurance for Institutional Commitment (Section II) that requires the submitting organization to establish and maintain a program for activities involving animals in accordance with the Guide for the Care and Use of Laboratory Animals (Guide). Taxon-specific guidelines may be used as supplemental references. Departures from the Guide must be approved by the IACUC and based on scientific, veterinary, medical, or animal welfare issues (for more information, see OLAW-Departures from the Guide).

Chapter II.D.7, *Projects Requiring High-Performance Computing Resources, Large Amounts of Data Storage, or Advanced Visualization Resources*, includes additional language that clarifies how submitters can address the locally available high-performance computing resources in their proposal. The description of available computing resources has also been updated.

Chapter II.E.11, *Research Infrastructure Proposal*, has been updated to include a reference to the Large Facilities Manual, a public document managed by the Large Facilities Office, which contains NSF policy related to the planning and management of large facility projects.

Exhibit II-1, *Proposal Preparation Checklist*, has been clarified with an additional sentence letting proposers know that Fastlane uses different rules for each type of proposal (e.g. Research, RAPID, EAGER, RAISE, GOALI, Ideas Lab, FASTED, Conference, Equipment or Travel) to check for compliance prior to submission to NSF. Additional checklist components have also been added to assist proposers in the pre-submission administrative review of proposals to NSF.

Exhibit II-2, *Potentially Disqualifying Conflicts of Interest*, has been updated to clarify the types of relationships that would prevent a reviewer from reviewing a proposal unless a waiver has been
granted by NSF. Specifically, language relating to serving as a consultant at an organization, and involvement as a former Ph.D. student/advisor has been added in this exhibit.

Exhibit II-6, *Nondiscrimination Certification*, has been revised to ensure that references to subrecipients, contractors and subawards are consistent with definitions in 2 CFR § 200, Subpart A, Acronyms and Definitions.

Exhibit II-7, *Definitions of Categories of Personnel*, has been updated to clarify that a Faculty Associate can be a faculty member or equivalent at the performing institution.

Chapter III.F.2(c)(3), *Process to Appeal NSF’s Decision to Decline a Proposal for Financial or Administrative Reasons, Procedures*, includes additional language to clarify that proposers may submit documentation to support their statements – even documentation that may not have been presented as part of the original review process – as long as it is not "new" information that would not have been available at the time the decision to decline was made.

Chapter IV.D.2(b), *Reconsideration*, has been updated to include Research Advanced by Interdisciplinary Science and Engineering (RAISE) in the list of proposals for which NSF's reconsideration process does not apply.

**Significant Changes to the PAPPG Part II**

Chapter VI.D.3.c(ii), *NSF-Approved Extension*, has been updated to clarify that a request for an NSF-approved extension should be submitted at least 45 days prior to the end date of the grant and must be signed and submitted by the AOR via use of NSF’s electronic systems. Information has also been added to make grantees aware of the limited time period of availability of funds due to cancelation of appropriations.

Chapter VII.B.2.c, *Addition of co-PI/co-PD*, has been added to provide instructions to grantees desiring to add a new co-PI/co-PD. This section includes instructions on how an AOR can prepare and submit this request via use of NSF’s electronic systems. This section lists the required components of this type of grantee request.

Chapter VIII.C.2, *Payment Policies*, has been amended to remove the requirement that grantees must certify that all disbursements have been made, or will be made within three days of the receipt of the payment.

Chapter VIII.E.6, *Award Financial Reporting Requirements and Final Disbursement*, has been supplemented with a new subpart, E.6., to make grantees aware of how NSF awards with canceled appropriations will be treated and to include the regulatory citation related to expiration of appropriated funds. In accordance with 31 USC 1552(a), funds will no longer be available for expenditure for any purpose beyond September 30th of the fifth fiscal year after the expiration of a fixed appropriation’s period of availability for incurring new obligations.

Chapter X.C.5, *Travel and Temporary Dependent Care Costs*, includes additional information on allowable travel expenses to specify that costs of employees on travel status are limited to those specifically authorized by 2 CFR § 200.474.
Chapter XI.B.1, Human Subjects, has been updated to reflect the Foundation’s implementation of 45 CFR 690.118, applications and proposals lacking definite plans for involvement of human subjects. Clarification has also been added regarding the IRB documentation that NSF must have for projects that involve human subjects.

**Clarifications and Other Changes to the PAPPG Part II**

Chapter VII.B.2.e, Substitute (Change) PI/PD or co-PI/co-PD, includes additional instructions on how an AOR can prepare and submit the request via use of NSF’s electronic systems. This section now lists the required components of this type of grantee request.

Chapter VIII.E.5, Award Financial Reporting Requirements and Final Disbursement, has been updated to inform grantees of the time limits applicable to the upward or downward adjustments to the Federal share of costs for a financially closed award.

Chapter IX.A, Conflict of Interest Policies, has been amended to remove the term "contractors" from this section for greater consistency with 2 CFR § 200, Subpart A, Acronyms and Definitions.

Chapter X.A.2.b, Pre-Award (Pre-Start Date) Costs, includes an additional footnote reminding grantees that in the case of a renewal award, costs incurred under the old grant cannot be transferred to the new grant.

Chapter X.B.2, Administrative and Clerical Salaries & Wages, has been updated to reference 2 CFR § 200.413, Direct Costs. Language has also been added to clarify that an AOR should initiate the request for NSF approval to direct charge salaries of administrative or clerical staff after an award has been made.

Chapter X.B.3, Intra-University (IHE) Consulting, has been revised to include an additional reference to 2 CFR § 200.430(h)(3) to assist proposers in locating the relevant requirements in the Uniform Guidance.

Chapter XI.B.3, Vertebrate Animals, has been supplemented with language regarding NSF’s implementation of the Federal Awardee Performance and Integrity Information System.