

## **Frequently Asked Questions (FAQs) On Proposal Preparation and Award Administration Related to NSF *Proposal & Award Policies & Procedures Guide* (PAPPG) (NSF 22-1)**

### **A**

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

***What is an assistance listing and where can a proposer/grantee find the listings associated with NSF programs?***

The System for Award Management (SAM) provides detailed, public descriptions of all Federal assistance listings. SAM replaces the Catalog of Federal Domestic Assistance (CFDA), and all CFDA.gov functionality and data can be found on SAM.gov. Each assistance listing, however, continues to be associated with a unique five-digit CFDA number. These numbers are important for tracking and audit purposes. The applicable CFDA 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](#).

#### **Audit Reports**

***Where should copies of audits required by 2 CFR §200, Subpart F be sent?***

In accordance with 2 Code of Federal Regulations (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance), awardees that are States, local governments or non-profit organizations must submit copies of their audit reports to the Federal Audit Clearinghouse (FAC). See 2 CFR §200.512(b) for additional information.

#### **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 on the NSF website](#). 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

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

Senior personnel must 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.C.2.f\(i\)\(c\)](#) 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?***

The requirement that all products be "citable and accessible" is not a submission requirement, in the sense of blocking a proposal from consideration, but a definition of the standard to which proposers should adhere. [PAPPG Chapter II.C.2.f\(i\)\(c\)](#) also notes that full citation information should be included where applicable and practicable. References to organizational or other websites are allowable, provided that the site is available for a reasonable percentage of the time.

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

Information on NSF-approved formats for the biographical sketch, including FAQs on using SciENCv and the NSF Fillable PDF, is available on the [NSF website](#).

## C

### Categories of Funding Opportunities

***What types of mechanisms does NSF use to generate proposals? In what scenario is each mechanism used?***

NSF utilizes a variety of mechanisms to communicate opportunities for research and education support, as well as to generate proposals. There are four categories of funding opportunities: Program Descriptions, Program Announcements, Program Solicitations and Dear Colleague Letters (DCL). For a description of each category and further information, see [PAPPG Chapter I.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.D.3.b](#), 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.

#### Collaborators and Other Affiliations

A [separate set of FAQs related to collaborators and other affiliations](#) is available on the NSF 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?***

This requirement specifically pertains to NSF conference proposals. [PAPPG Chapter II.E.9](#) requires conference proposers to have a policy or code-of-conduct that addresses

sexual harassment, other forms of harassment, or sexual assault, and that includes clear and accessible means of reporting violations of the policy or code-of-conduct. The policy or code-of-conduct must address the method for making a complaint as well as how any complaints received during the conference will be resolved. This policy or code-of-conduct must be disseminated to conference participants prior to attendance at the conference as well as made available at the conference itself. Proposers are not required to submit the policy or code-of-conduct for review by NSF.

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

Per the [PAPPG Chapter II.E.9](#), “As needed, 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.D.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.

**Cost Sharing**

***Where can I find more information on NSF's cost sharing policy?***

Guidance on NSF’s cost sharing policy can be found in [PAPPG Chapter II.C.2.g\(xii\)](#) and [Chapter VII.C](#).

***PAPPG Chapter II.C.2.g.(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.

***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 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, grantees may, at their own discretion, contribute voluntary uncommitted cost sharing to NSF-sponsored projects.

***Where can the PI describe the time they will spend on a project if they do not request salary?***

The Facilities, Equipment and Other Resources section should contain an aggregated description of the internal and external resources (both physical and personnel) that the organization and its collaborators will provide to the project, should it be funded. The description should be narrative in nature and must not include any quantifiable financial information.

**Current and Pending Support**

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

**D**

**Data Management Plan**

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

All proposals must describe plans for data management and sharing of the products of research or assert the absence of the need for such plans. NSF's electronic systems will not permit submission of a proposal that is missing a Data Management Plan. The Data Management Plan will be reviewed as part of the intellectual merit or broader impacts of the proposal, or both, as appropriate. See the [Dissemination and Sharing of Research Results](#) website for further information.

## **Deadline Dates**

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

If the deadline date falls on a weekend, it will be extended to the following Monday; if the date falls on a Federal holiday, it will be extended to the following business day (see [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. Further information can be found in [PAPPG Chapter I.F.](#)

### ***How do I submit a proposal after the deadline date if an extension has been granted due to a natural or anthropogenic disaster?***

To submit the proposal after the deadline date, proposers must check the "Special Exception to the Deadline Date Policy" box on the NSF Cover Sheet, indicating NSF approval has been obtained. A statement identifying the nature of the event that impacted the ability to submit the proposal on time should be uploaded under Nature of Natural or Anthropogenic event in the Single Copy Document section. If available, written approval from the cognizant NSF Program Officer also should be uploaded under the Additional Single Copy Documents in the Single Copy Document section (see [PAPPG Chapter I.F.](#) for further information).

## **E**

### **Eligibility**

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

Unless specifically authorized in an NSF solicitation (e.g., NSF postdoctoral fellowship programs), unaffiliated individuals in the U.S. and unaffiliated U.S. citizens are not eligible to receive direct funding support from NSF.

Recipients of Federal funds must be able to demonstrate their ability to fully comply with the requirements specified in 2 CFR §200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*. As such, unaffiliated individuals are strongly encouraged to affiliate with an organization that is able to meet the requirements specified in 2 CFR §200 (see [PAPPG Chapter I.E.5](#) for further information).

***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 grants 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. A proposed project is only eligible for support if it meets one or more of the exceptions contained in [PAPPG Chapter I.E.7](#), as determined by a cognizant NSF Program Officer. Preliminary inquiry should be made to the appropriate program before preparing a proposal for submission (see [PAPPG Chapter I.E.7](#) for further information).

***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 long-standing stance on the definition of "organization" is that, in addition to having its own Data Universal Numbering System (DUNS) number and being registered via an NSF electronic system, 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.

**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 grantees 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 grantees 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](#), if the rate(s) used in the proposal is lower than the rate(s) in effect at the time of award, grantees may charge NSF "less than the full negotiated rate" (the under-recovery is considered voluntary uncommitted cost share). However, grantees 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, 2021 through June 30, 2022    47%

Predetermined            July 1, 2022 through June 30, 2023    50%

If the proposal is funded in September, they can use the 47% rate. In fact, for any award made after July 1, 2021, they can rebudget and claim indirect costs at the 47% rate.



If, however, the rate agreement will be negotiated again in 2021 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.C.2.g\(viii\)](#) 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.C.2.g\(viii\)](#) and [OMB 2 CFR FAQs, Question 132](#).

***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 grantee 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.C.2.g\(viii\)](#) for further information).

### **International Activities/Considerations**

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

The PAPPG provides guidance on what is required for proposals that include funding to be provided to an international branch campus of a U.S. IHE. 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 must follow the preparation instructions in PAPPG [Chapter I.E.1](#) and [Chapter I.E.6](#).

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

NSF rarely provides direct funding support to foreign organizations. NSF will consider proposals for cooperative projects involving U.S. and foreign organizations, provided support is requested only for the U.S. portion of the collaborative effort. In cases however, where the proposer considers the foreign organization's involvement to be essential to the project (e.g., through subawards or consultant arrangements), the proposer must explain why local support is not feasible and why the foreign organization can carry out the activity more effectively (see [PAPPG Chapter I.E.6](#) 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.D.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 new proposer 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](#) includes information on: Administration and Management Information; Accounting System Requirements and Auditing Information; and Payments to Organizations with Awards. This information 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 grant, 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 proposal was submitted as a multi-organization 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 – see [PAPPG Chapter VI.D.3.c\(i\)](#).

## **NSF-approved Formats**

***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 support](#), including FAQs on using SciENCv and the NSF Fillable PDF, 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 in the Other Direct Costs line item of the NSF Budget (see [PAPPG Chapter II.C.2.g.vi\(a\)](#) 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 grant. 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 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.

***Do participant support costs apply for all participants, or do they only apply for non-awardee organization participants?***

Participants from the submitting institution and other institution(s) could be considered participants.

***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 effort (amount of time) that PI(s), faculty and other senior personnel will devote to a specific project. The effort is based on the organization's regular academic-year, summer 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 block (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.C.2.g\(i\)](#) 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.C.2.j](#).

***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. If you are submitting

to a program solicitation, we advise that you consult with the cognizant NSF Program Officer(s) listed in the program solicitation for additional guidance.

***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.C.2.j](#). If you are requesting supplemental funding to support the postdoctoral researcher, the guidance in [PAPPG Chapter VI.E.4.f](#) should be followed. In either case, the PI must report on the mentoring activities provided to the individual in the annual and final project reports.

### **Prior Approval Requirements**

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

The [Research Terms and Conditions \(RTC\), Appendix A](#), (NSF column) provides a consolidated listing of prior approvals that are required to be obtained from NSF. Unless otherwise specified in the grant notice or the applicable grant general terms and conditions, no additional prior approvals beyond those specified in RTC Appendix A are required. [PAPPG Chapter VII.A.2](#) also provides a listing of required notifications to NSF.

### **Proposal Preparation**

***Are there any specific page numbering requirements which should be used in preparation of a proposal?***

Proposers are advised that Research.gov will automatically paginate your proposal, however, FastLane does not. Each section of the proposal that is uploaded in FastLane as a file must be individually paginated before upload to the electronic system (see [PAPPG Chapter II.B.1](#) for further information).

***May Uniform Resource Locators (URLs) be included within the Project Description? What about in other sections of the proposal?***

PIs are advised that the project description must be self-contained and are cautioned that URLs must not be used because 1) the information could circumvent page limitations; 2) the reviewers are under no obligation to view the sites; and 3) the sites could be altered or deleted between the time of submission and the time of review. Inclusion of URLs in other sections of the proposal is not prohibited by the PAPPG, however, PIs should be advised that reviewers are under no obligation to view the site(s).

## R

### Reconsideration

#### ***What is the process for requesting reconsideration of an NSF funding decision?***

A PI whose proposal for NSF support has been declined generally will receive information and an explanation of the reason(s) for declination along with copies of the reviews considered in making the decision.

If the explanation provided does not satisfy the PI, he/she may request that the cognizant NSF Assistant Director or Office Head reconsider the action to determine whether the proposal received a fair and reasonable review, both substantively and procedurally. Consult [PAPPG Chapter IV.D](#) for additional information on the NSF reconsideration process, including the categories of actions that are subject to the NSF reconsideration policy.

### 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 grantees use Research.gov for the preparation and submission of annual and final 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)

#### ***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](#).

## S

### 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.C.2.g.\(i\)](#) applies to all senior personnel listed on the NSF budget. The policy does, however, allow for flexibility to request more than two months of salary per year, when applicable. 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.

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

Under normal rebudgeting authority, a grantee 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 grantee 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.C.2.i](#) 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 are reminded that they remain subject to the provisions of 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**

***I am seeking clarification on what is allowable regarding the synergistic activities section of the biographical sketch. Are multiple components allowed?***

NSF policy ([PAPPG Chapter II.C.2.f\(i\)\(d\)](#)) 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. As an example, the PI may summarize that he/she 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.



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### 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 an American carrier for the part of the trip that has a City Pair fare?***

The requirement is only that the grantee 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 grant?***

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 §200.474 are met.

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

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 the Line G6 "Other" direct costs category of the NSF budget.

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 grant.

### Tuition Remission

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

NSF is aware that there is variation in how institutions of higher education charge tuition. Therefore, proposers should budget tuition remission consistent with their established, documented cost allocation policies, which must comply with the Uniform Guidance.