

**From:** [Hawkins, Matthew J.](#)  
**To:** [Yasky, Rebecca Kay](#)  
**Subject:** Important changes to MFG Sections 1.4 and 4.2.5  
**Date:** Friday, May 7, 2021 8:17:57 AM

---

Hi, Rebecca....Following an exchange with Jim around Rubin and the NSB, please make Jim's suggested change to the MFG highlighted below. As far as other header/text changes, please make the following changes:

- **4.2.5 – Risk Planning for the Construction Stage**
- **4.2.5.1 – Implementation of NSF's No Cost Overrun Policy.** Make first paragraph in 4.2.5.2 and the 5 items the lead text for this Section. Add a sentence before the 7 items that reads *"NSF uses the following practices to implement the five mechanisms above:"*
  - Change second sentence in item 1 to read: *"The amount of management reserve (if any) is determined by NSF and held by NSF following authorization and identification of the funding source."*
- **4.2.5.2- Introduction to Budget Contingency.** Lead sentence starting with *"Budget contingency is..."*

Any other thoughts?

Matt

---

**From:** Ulvestad, James S <julvesta@nsf.gov>  
**Sent:** Friday, May 7, 2021 7:37 AM  
**To:** Hawkins, Matthew J. <mjhawkin@nsf.gov>  
**Subject:** Re: NSBO Feedback on Rubin Presentation

Hi Matt,

Effectively, we have changed 1.4.6 in practice without explicit approval. 1.4.6 was made-up language from a budget request 13 years ago. At the least, 1.4.6 needs a sentence that says *"The implementation of the No-Cost Overrun Policy is defined more fully in Sections 4.2.5.1 and 4.2.5.2."*

Without that cross-reference, Section 1.4.6 is taken as the whole story. I remembered that we had the refinement elsewhere, but not where. If we make a cross-reference, then it is explicit.

Jim

---

**From:** "Hawkins, Matthew J." <mjhawkin@nsf.gov>  
**Date:** Friday, May 7, 2021 at 7:30 AM  
**To:** "Ulvestad, James S" <julvesta@nsf.gov>

**Subject:** RE: NSBO Feedback on Rubin Presentation

Good time to make “clarifications” before it goes final in September...and before we send to OMB for clearance. It’s really two sections...

1.4.6 is the historical part. We could revise that, but wouldn’t we need to get something expressly stated from Paunch who may then want to have the NSB approve it?

We’ve handled this though implementation in Section 4.2.5.1 and 4.2.5.2 of the MFG (attached). Is there anything we should revise here? I can definitely see changing the header for 4.2.5 to read “4.2.5 – Risk Planning for the Construction Stage” or “Implementation of the No Cost Overrun Policy”.

Matt