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Chapter II.D.2.f.(i)(a)

The first paragraph of this section basically states that the NSF expect cost share through that portion of a faculty's normal 9-month appointment that supports research. This is a misinterpretation of the intent of the research portion of a tenured/tenure track faculty position. The research portion of a faculty appointment is directed toward investigating new avenues of research, gathering pilot data for future grant applications, training new students, writing grants, complying with ever-increasing regulations related to conduct of sponsored projects, etc. A faculty appointment is now consumed with these activities and it is unreasonable for NSF to expect faculty to cost share this time. If the NSF wants faculty and institutions to cost share on sponsored projects, they should ask for it instead of hiding it in this policy.

Case and point is the second paragraph, which states that the NSF limits the salary it will pay to two months. There is an exception stated, but as a practical matter, program managers leverage this language in the PAPG, sometimes in exploitive ways such as holding out this section before making a final award decision. In fact, some have gone so far as to tell the faculty that they will hold up an award decision until the faculty is compliant with the "two-month rule". That is not what this section states, and to misrepresent it is unethical. Lastly, this form of cost share creates massive inequality that NSF needs to consider. Wealthier institutions that can afford to underwrite NSF-funded projects can compete better for funding, which those that cannot afford to pay their faculty to run NSF projects cannot. In this era of vast inequity between academic institutions, NSF needs to consider this policy, its language and implementation, and the consequences on universities.

If NSF is requiring cost share, state it, require it, and enforce it. Continuing to hide it is a farce that creates an uneven playing field. If NSF would like to address this hidden (not so hidden) cost to institutions, the language should be made more clear. Here is a suggestion:

Current language

NSF regards research as one of the normal functions of faculty members at institutions of higher education. Compensation for time normally spent on research within the term of appointment is deemed to be included within the faculty member's regular organizational salary.

Suggested edits

NSF regards research as one of the normal functions of faculty members at institutions of higher education. Research should be included within the faculty member's regular organizational salary and the research substitutions of NSF-funded dedicated staff are possible, reorganizational staff should seek titles if so and may two be available to guide projects and as a result the view of NSF of NSF Manager project should encourage the staff of this example, available compensation for time normally spent on a research institution's term of appointment NSF is.