

Section #	Section Name	Item Being Addressed	Comment
2.5.1	Operations and Management Oversight	Annual Work Plan	Not a comment for the draft, but I would be interested in seeing a sample document for the layout and appendices that accomplishes this: <i>For many facilities, the AWP, annual operations proposal, and Cost Estimating Plan (per Sections 4.2.2 and 4.2.4) can be combined as one document, so long as all elements are addressed.</i>
2.5.1	Operations and Management Oversight	Annual Report	It would be helpful to have definitive clarification of what should be included in the "Annual" report timeframe. This document mentions the "previous twelve months" and the "year's goals described as in the AWP." However, in reality, the Annual report is due 90 days <i>before</i> the end of the AWP POP, so the "Annual" Report either covers 12 months of two different project years (3 months of the prior year and 9 months of the current report year) or just the 9 months of the current report year. Neither of which quite fit the statement in the Major Facilities Guide. Different directorates, even different POs within the same directorate, are inconsistent in their interpretation of the how the annual report timeframe is applied.
4.2.2.3	Application of GAO Cost Guidance to Major Facilities	Full Section	The addition of this section is helpful by summarizing each of the 12 GAO steps and providing some interpretation, insight, and suggested approaches as to how the steps might be applied to the MF.
4.2.2.4	Application of 2 CFR § 200 Cost Principles to NSF Budget Categories from the PAPPG	Note prior to section G.1.	Inclusion of the Subrecipient vs. Contractor checklist is useful. This is an area that often raises questions.
4.2.6	Budget Contingency Planning during the Operations	First paragraph	Need to correct typos/grammar: Text should read: "there are many inherent risks with operations" or "there <u>is</u> inherent risk with operations" and "Basis of Estimate"
4.6.4	NSF Performance Metric for Construction	First paragraph	Positive EVM Variances are important as they characterize the accuracy of the baseline estimate, so suggest changing this: "at, or better than, negative 10 percent," to "at, or better than, positive or negative 10 percent."
4.6.4	NSF Performance Metric for Construction	First paragraph	This statement: "Projects that are less than 10 percent complete are not held to this goal because EVM data is less meaningful statistically in the very early stages of a project" is not correct. EVM in the earliest stages of a project are actually good indicators of the quality of the baseline budget and schedule. For example, statistics have shown that a project that is less than 10 percent underway, but has significant cost and schedule variances, is likely to never recover.
4.6.6.3	Business Systems Reviews (BSR)	Third paragraph	Changing the five-year cycle to "a regular review cycle" makes the statement vague and opens up the possibility of more frequent BSRs. If the intent is to delete the five-year requirement (as is noted in #25 in the Summary of Significant Changes), perhaps the language should be the same as the referenced BSR Guide (although the posted version is old). The Guides identifies the frequency as " <i>Whenever possible</i> , the BSRs are conducted on a five-year cycle..."
5			Overall comment: This section is much less detailed than others, although it does refer to other sections as reference. There are a wide variety of projects that will fit into this category, and while it is preferable to correlate the tracking and reporting overhead to the size of the project, the sections should list minimum requirements, and use established project management protocols to define the difference in management scope between a mid and large scale projects.
5			"does not preclude the requirement for appropriate rigor": Add detail to the remaining sub-sections that support this statement, similar to section 4.
5		bullet list in 5th paragraph	change "Level of maturity on collaboration or partnerships" to "Level of maturity of collaborations or partnerships."
5		bullet list in 5th paragraph	change "Technical feasibility and consideration of risks" to "Technical feasibility, cost impacts, and consideration of risks and opportunities."
5.2			"not subject to the formal stage-gate review process", and the "internal proposal review... should be sufficiently robust": The "internal review" should list types of minimum criteria, and who within NSF conducts (and approves) the reviews. The NSF Program Officer?
5.3			"not subject to NSF's "No cost overrun"policy": Add formality to this statement, certainly add detail to section 4.3 (especially critical as other reporting / tracking mechanisms are being simplified).

6.8		first paragraph	EVMS can provide metrics and uncover problems, so change "forecast" to "uncover." Remove the word "also" from last sentence.
6.8.1		First paragraph, first bullet	The first bullet appears to disallow the use of "Planning Packages," which are commonly used for activities with known work content but without detailed schedule activities. Is this correct?
6.8.1		First paragraph, second bullet	Suggest replace the word "control" with "delivery"
6.8.1		First paragraph, fourth bullet	Suggest replace the word "accomplishing" with "calculating"
6.8.1		First paragraph, fifth bullet	Suggest replace the word "performance" with "package"
6.8.1		First paragraph, sixth bullet	Suggest adding "develop corrective actions," following "forecast impacts."
6.8.2		First paragraph	add "with" before "a reliable basis..."
6.8.3			Add EVMS Training to this section on "Guidelines for Establishing an EVMS."
7		PMBOK reference	Guide to the Project Management Body of Knowledge is currently on 6th Edition, 2017.
8		Acronyms	The most common widespread definition of "CDR" is "Critical Design Review," not "Conceptual Design Review." Conceptual Design Reviews are frequently abbreviated to "CoDR."
9.2		page 9-7	Second sentence of ICE is redundant to the first sentence.
Other:			
NSF Financial Data Collection Tool for Major Facilities 2019	CSA Budget Worksheet	Column E - Current Expenditures	Blue cells in Column E of tab "CSA Budget Worksheet" appear to be missing the proper formulas. I believe they should be linked to the "CSA Cost Workseet".
Large versus Major Facilities Guide	general		There are multiple instances of "Large Facility," "LFOs," "HLFO," and "Large Facilities" throughout the document, including the header, 2.1.6-15 through -18. 2.1.6, 4.6.2-2, 2.1.4-5, 2.1.6-1 through -3, and page 8-2. I believe the intention was to change these instances to align with new terminology "Major Facility."