



National Science Foundation • Office of Inspector General
2415 Eisenhower Avenue, Alexandria, Virginia 22314

MEMORANDUM

DATE: July 24, 2019

TO: Suzanne H. Plimpton
Reports Clearance Officer

FROM: Mark Bell *Mark Bell*
Assistant Inspector General
Office of Audits

Megan Wallace *Megan Wallace*
Assistant Inspector General
Office of Investigations

SUBJECT: Office of Inspector General Comments on the Draft *Proposal and Award Policies and Procedures Guide, NSF 20-1*

Attached are the consolidated comments of the National Science Foundation Office of Inspector General on the draft *Proposal and Award Policies and Procedures Guide* (PAPPG). Overall, we are happy with NSF's continued commitment to proper grant oversight. However, we note in several comments that there is an opportunity for improved clarity regarding how the PAPPG, in its entirety, is incorporated into the terms and conditions of individual awards. We hope you find our comments and suggestions useful.

If you have any questions or wish to discuss, please contact Ken Lish, Acting Director, Contract Grant Audits, at 303-844-4738.

Attachment

Comment	Section / Page Number	Language in PAPPG/Observations	Comments and Suggestions
1	Introduction, Sec. B, pg. x (PDF pg. 11/164)	“When NSF Grant General Conditions or an award notice reference a particular section of the PAPPG, then that section becomes part of the award requirements through incorporation by reference.”	This sentence is confusing in light of the preceding sentences, which state, “Part II of the <i>NSF Proposal & Award Policies & Procedures Guide</i> sets forth NSF policies regarding the award, administration, and monitoring of grants and cooperative agreements. Coverage includes the NSF award process, from issuance and administration of an NSF award through closeout. Guidance is provided regarding other grant requirements or considerations that either are not universally applicable or do not follow the award cycle.” NSF General Grant Conditions require recipients to comply with NSF policies (NSF General Grant Conditions, Article 1.d.2), which are set forth in this document. The sentence in question could wrongly lead one to believe that only sections of the PAPPG specifically mentioned in award terms and conditions need to be followed. We strongly suggest that this sentence be removed.
2	Introduction, Sec. E.10, pg. xix (PDF pg. 20/164)	“10. Office of the Inspector General (OIG)”	Remove the word “the” from “Office of the Inspector General”; the name is “Office of Inspector General”.
3	Chapter I, Sec. D.3, pg. I-4 (PDF pg. 25/164)	“Authors other than the PI (or any co-PI) should be named and acknowledged.”	We recommend NSF specify a location for author acknowledgement, for example, as the first entry in the Bibliography. OIG regularly receives queries from both POs and PIs regarding where in the proposal authors not named in the cover sheet should be acknowledged. Clearly stating where such information should be specified would help alleviate confusion and ensure that such information is included and readily identifiable within the proposal.
4	Chapter I, Sec. D.3, pg. I-4 (PDF pg. 25/164)	“Allegations of research misconduct are taken seriously and are investigated by NSF’s Office of the Inspector General (OIG).”	Remove the word “the” from “Office of the Inspector General”; the name is “Office of Inspector General”.

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6	Chapter I, Sec. G.1, pg. I-8 (PDF pg. 29/164)	“Submission of government-wide certifications and representations is addressed below.”	Suggest referencing the actual section(s) where the government-wide certifications and representations are addressed.
7	Chapter I, Sec. G.2, pg. I-8 (PDF pg. 29/164)	“Failure to comply with SAM certification requirements prior to proposal submission will impact the processing of the proposal.”	Suggest specifying the impact to the processing of the proposal (e.g., processing delays, ineligible for proposal submission, etc.).
8	Chapter II, Sec. C.1.d, pg. II-4 (PDF pg. 34/164)	<ol style="list-style-type: none"> 1. “Government-wide Certifications and Representations are provided by the proposer on an annual basis in SAM.” 2. “The AOR must use the “Authorized Organizational Representative function” to sign and submit the proposal, including NSF-specific proposal certifications.” 3. “The required proposal certifications are as follows...” 	Several government-wide certifications were removed to implement M-18-24, including Drug-Free Workplace, Debarment and Suspension, Certification Regarding Lobbying, Certification Regarding Nondiscrimination, Certification Regarding Federal Tax Obligations, and Certification Regarding Criminal Convictions. All other certifications that must be provided via the AOR function in NSF’s electronic system are still included in this section. However, the language does not make it clear that only NSF-specific proposal certifications are now listed. We suggest specifying that the included proposal certifications are only the NSF-specific proposal certification, and the government-wide certifications are in SAM.
9	Chapter II, Sec. C.2.f(i), pg. II-13 (PDF pg. 43/164)	“A separate biographical sketch (limited to two pages) must be provided for each individual designated as senior personnel through use of an NSF-approved format.”	The language does not specify that a description of NSF-approved format(s) for biographical sketches will be posted on the NSF website. We suggest specifying in the actual language that a description of the approved format(s) will be posted on the NSF website and include the actual location of the website. And specifying that all outside affiliations, foreign and domestic, must be listed.

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11	Chapter II, Sec. C.2.g(i)(a), pg. II-15 (PDF pg. 45/164)	“As a general policy, NSF limits the salary compensation requested in the proposal budget for senior personnel to no more than two months of their regular salary in any one year.”	<p>The purpose of this “general policy” appears to be to implement the preceding paragraph: “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.”</p> <ol style="list-style-type: none"> 1. We suggest strengthening the last sentence quoted above by adding, “NSF funds are not intended to subsidize normal functions already required of faculty members and included in faculty salaries.” 2. Although NSF states its “general policy” for senior personnel compensation as a limit, awardees are allowed to exceed this limit “(u)nder normal rebudgeting authority.” We suggest that NSF should either (a) move away from the 2-month salary limit and develop a new means to implement its position that faculty members’ institutional salaries include compensation for research, or (b) enforce the limit by requiring specific NSF approval for senior personnel salaries in excess of two months per year.

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			<p>3. We suggest that NSF affirmatively state that the senior personnel salary policy applies to all employees included in the senior personnel section of the proposal budget, regardless of their job classification within the institution.</p> <p>4. The policy states that “no prior approval from NSF is necessary unless the rebudgeting would cause the objectives or scope of the project to change.” We suggest that NSF provide guidance to assist awardees in determining whether a proposed change would result in a change of project scope or objectives.</p>
12	Chapter II, Sec. C.2.h, pg. II-23 (PDF pg. 53/164)	The draft language includes amending the Current and Pending Support language to clarify NSF’s requirements for submission of current and pending support information.	We recommend adopting this change to clarify the existing rules to ensure senior personnel are disclosing all current and pending support. Specifically, we recommend NSF keep the language specifying that disclosure is required regardless of whether the support is financial or in-kind, including an explicit reference to consulting support, and that there is no minimum amount of time established. Such provisions will ensure disclosures to NSF are accurate and complete so that NSF can make an informed decision when evaluating proposals.
13	Chapter II, Sec. C.2.h, pg. II-23 (PDF pg. 53/164)	Current and Pending Support requirement	We recommend requiring updated and certified current and pending support information prior to an NSF award recommendation and with each interim/annual/final project report rather than just at the time of proposal submission.
14	Chapter II, Sec. C.2.h, pg. II-23 (PDF pg. 53/164)	“If the project (or any part of the project) now being submitted has been funded previously by a source other than NSF, provide the required information describing the last period of funding.”	We recommend NSF adopt similar language to NIH Form PHS 398/2590 Other Support, which requires explicit statements to address any potential overlap (scientific, budget, effort level) and how it would be resolved.

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16	Chapter II, Sec. C.2.i, pg. II-23 and II-24 (PDF pgs. 53 and 54/164)	1. “Proposers should include 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.” 2. “Although these resources are not considered voluntary committed cost sharing as defined in 2 CFR § 200.99, the Foundation does expect that the resources identified in the Facilities, Equipment and Other Resources section will be provided, or made available, should the proposal be funded.”	Coupling the mention of cost sharing with the expectation that the resources will be provided or made available implies that items mentioned in this section should not be later charged to NSF as costs of the resulting award. If it is NSF’s expectation that resources listed in this section are to be made available to the award without additional cost to NSF, then NSF should make this clear. If that is not NSF’s intent, we suggest NSF direct proposers state that NSF funds are requested for these resources and include a reference to where in the proposal budget charges for the resources are included.
17	Chapter VI, Sec. C, pg. VI-2 (PDF pg. 96/164)	“When these conditions reference a particular PAPPG section, that section becomes part of the award requirements through incorporation by reference.”	Please see our suggestions outlined in comment number 1.
18	Chapter VII, Sec. B.1.a, pg. VII-2 (PDF pg.101/164)	1. “The objectives or scope of the project may not be changed without prior NSF approval.”	We suggest defining change of scope and/or providing a list of circumstances that could be considered a change of scope. Guidance that is more clearly defined will help

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		2. "Prior written NSF approval also is required for changes to the Facilities, Equipment and Other Resources section of the approved proposal that would constitute changes in objectives or scope."	researchers, administrators, and other stakeholders better understand what circumstances would constitute a change in scope.
19	Chapter VII, Sec. B.1.b, pg. VII-2 (PDF pg. 101/164)	"Significant changes in methods or procedures should be reported to appropriate grantee official(s). The PI/PD also must notify NSF via use of NSF's electronic systems."	We suggest defining the word "significant" within the context of this guidance and/or provide examples as to what represents a "significant" change in methods or procedures. Guidance that is more clearly defined will help researchers, administrators, and other stakeholders better understand what circumstances should be reported to NSF and other appropriate grantee officials.
20	Chapter VII, Sec. C, pgs. VII-6 and VII-7 (PDF pgs. 105 and 106/164)	"Failure to provide the level of cost sharing required by the NSF solicitation and reflected in the NSF award budget may result in termination of the NSF award, disallowance of award costs and/or refund of award funds to NSF by the grantee."	<p>NSF should expand this guidance to explain what happens in cases where NSF rejects all or a portion of a recipient's claimed cost share.</p> <p>The current policy covers what a recipient needs to do should it become aware that it is unable to provide the amount of cost share included in the proposal budget, but does not detail potential outcomes of claimed cost share being rejected by NSF. For example, an audit may question all or a portion of the recipient's cost share and NSF may sustain the audit findings. If this causes the recipient to fall short of its mandatory cost share requirement, then the recipient is not in compliance with award terms and conditions and should not receive the full amount of NSF approved funds.</p> <p>This section should include procedures for computing the allowable Federal share of total project costs in cases</p>

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			where the full amount of mandatory cost share is not provided in the form of allowable project costs, funded by non-Federal sources.
21	Chapter IX, Sec. B.3, pg. IX-4 (PDF pg. 121/164)	“Allegations of research misconduct are taken seriously and are investigated by NSF’s Office of the Inspector General (OIG).”	Remove the word “the” from “Office of the Inspector General”; the name is “Office of Inspector General”.
22	Chapter XII, Sec. C.3, pg. XII-6 (PDF pg. 163/164)	“Possible misconduct in activities funded by NSF should be reported to the Office of the Inspector General, National Science Foundation, 2415 Eisenhower Avenue, Alexandria, VA 22314, (703) 292-7100 or (800) 428-2189 or via e-mail at: oig@nsf.gov.”	<p>1. We recommend including the website, https://www.nsf.gov/oig/report-fraud/, in addition to phone number and email in this section, since some individuals may feel more comfortable submitting a complaint anonymously through a web form than in an email or over the phone.</p> <p>2. Remove the word “the” from “Office of the Inspector General”; the name is “Office of Inspector General”.</p>

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