



NSF and NSPM-33

Federal Demonstration Partnership Meeting

May 11, 2022

Jean Feldman, Head Policy Office

Office of Budget, Finance & Award Management

Division of Institution & Award Support

PAPPG (NSF 23-1) Proposed Changes

NSF Implementation of NSPM-33 Guidance

- NSF has been working for over three years to implement disclosure requirements for compliance with NSPM-33.
 - NSF has been collaborating with NIH to ensure our disclosure requirements are as consistent as possible, for use by researchers when preparing their Biographical Sketch and Current and Pending Support Documents.
- NSF, NIH, and OSTP co-chair an Interagency Working Group on Disclosure Policies
 - NSPM-33 Implementation Guidance included Harmonized Disclosure Requirements for use by Federal Research Funding Agencies.
 - Standardized data elements, instructions and templates are being developed for use by all federal research funding agencies for the Biographical Sketch and Current and Pending Support.
- New section on NSF disclosure requirements added to the PAPPG



NSF Implementation of NSPM-33 Guidance: NSF Pre-Award and Post-Award Disclosures Relating to the Biographical Sketch and Current and Pending Support

NSF Pre-award and Post-award Disclosures^{1/2/3} Relating to the Biographical Sketch and Current and Pending Support April 20, 2022

Table Key

* = for new support only

◆ = If undisclosed at the time of proposal submission

Type of Activity	Biographical Sketch	Current & Pending Support	Facilities, Equipment & Other Resources	Project Reports	Post-Award Information Term & Condition	Disclosure Not Required
Undergraduate, graduate, and postdoctoral training, including location, major/area and degree and year	✓					
Academic, professional ⁴ or institutional appointments, whether or not remuneration is received, and, whether full-time, part-time, or voluntary	✓					
All projects (including this project) currently under consideration from whatever source, and all ongoing projects, irrespective of whether support is provided through the proposing organization, another organization or <i>directly</i> to the individual		✓		✓*	✓◆	
In-kind contributions that support the research activity for use on the project/proposal being proposed			✓			



NSF Implementation of NSPM-33 Guidance: Initial Disclosures and Update/Correction Requirements

- NSF Pre- and Post-award Requirements for Disclosures and Update/Correction of Disclosures are as follows:
 - At the time of proposal submission: Collaborators and Other Affiliations, Biographical Sketch and Current and Pending Support.
 - Prior to making an award: Updated Current and Pending Support information must be submitted.
 - After an award is made: if the AOR discovers that a disclosure that should have been submitted at the time of proposal submission, but was not, they have 30 days to submit a post-award request to NSF.
 - At the time of project reporting: PIs and co-PIs must specify whether new, active other support has been received in their annual and final project reports. If yes, they must attach updated Current and Pending Support information.



NSPM-33 and NSF: Remaining Issues/Concerns

- Implementation of a Digital Persistent Identifier (DPI)
- Implementation of the Research Security Program requirement (NSPM-33 requires research organizations awarded in excess of \$50 million per year in total Federal research funding implement a research security program)
- Overall concerns with the timeframe associated with research agency implementation provided by OSTP
- Implementation in NSF research facilities and research contracts

