

NSF Addresses Salaries in Revised Guide for 2009

Researchers seeking National Science Foundation grant opportunities as of Jan. 5, 2009, must comply with new regulations, including a major revision to NSF's salary reimbursement policy.

The agency is updating its *Proposal and Award Policies and Procedures Guide* to make numerous changes. In a section on salaries and wages, the NSF will move away from the concept of summer salary. Instead, it will limit salary compensation for senior project personnel to no more than two months of their regular academic-year salary.

The current faculty summer salary policy states that salaries constitute appropriate direct costs and may be requested in proportion to the effort devoted to the research project. "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," it adds. "Summer salary for faculty members at colleges and universities on academic-year appointments is limited to no more than two-ninths of their regular academic-year salary. This limit includes summer salary received from all NSF-funded grants."

COGR, AAV Complaint

Research university organizations such as the Council on Government Relations and the Association of American Universities complained that this summer salary limit was "internally inconsistent" and "left institutions vulnerable to shifting compliance standards — and the attendant risk of punitive action from NSF's inspector general." They contended that most agencies allowed appropriate salary charges on awards at any time during the year in accordance with when and how the research effort was actually expended.

The NSF said that by revising its policy to limit salary compensation to no more than two months of senior project personnel's regular salary will allow these researchers to schedule work when appropriate through the year. Compensation for such personnel in excess of two months must be justified in the proposal, and if approved by the NSF, will be included in the award budget.

NSF IDs

The revised policy also includes a new section explaining that NSF IDs will be issued to principal investigators and grant applicants in place of social security numbers in NSF systems such as FastLane. The agency is making the change to comply with Office of Management and Budget and U.S. Office of Personnel

Management mandates for protecting sensitive agency information. As of August, about 85 percent of FastLane logins already were using NSF IDs.

The NSF also clarified its definition of principal investigator to better align with the one established in 2005 by the Office of Science and Technology Policy regarding the treatment of multiple PIs in federal research awards (see "Many Support Multiple PIs Despite Concerns," November 2005).

The agency's new PI/co-PI definition states that these personnel are "the individuals designated by the proposer, and approved by NSF, who will be responsible for the scientific or technical direction of the project. NSF does not infer any distinction in scientific stature among multiple PIs, whether referred to as PI or co-PI. If more than one, the first one listed will serve as the contact PI, with whom all communications between NSF program officials and the project relating to the scientific, technical and budgetary aspects of the project should take place. The PI and any identified co-PIs, however, will be jointly responsible for submission of the requisite project reports."

Other revisions to the guide, which becomes effective Jan. 5, 2009, include:

- clarifying that letters of intent are not binding on the proposer;
- clarifying that proper scholarship and attribution in the proposal is the responsibility of the proposal authors;
- identifying procedures proposers should use to obtain a NSF nondiscrimination certification from their subrecipients;
- requiring proposal requests to support postdoctoral researchers to include a separate section describing the mentoring activities;
- replacing the Small Grants for Exploratory Research program with the Grants for Rapid Response Research and Early-Concept Grants for Exploratory Research programs; and
- requiring that projects involving human subjects performed outside the United States receive Institutional Review Board approval.

For More Information

NSF is accepting comments on the new guide, which is available at http://www.nsf.gov/publications/pub_summ.jsp?ods_key=nsf091. 