NSF Safe and Inclusive Working Environment Plans

Navigate Webinar
August 9, 2023
Webinar Guidelines

Please mute your microphone and turn off your video.

Please use the Chat function to ask questions during the presentation.

The webinar recording and slides will be available on the Navigate Webinars: Past Sessions webpage in a few days.
Today’s Agenda

- Welcome and Introductions
- NSF Policy - Background
- U-M Implementation of the Policy
  - U-M Plan Template
  - PAF Changes
- PI / Project Team, Unit, and RA Responsibilities
- Resources
- Considerations & Q&A
NSF Policy - Background
NSF Policy - Background

How Did We Get Here?

- **February 2018:** [Important Notice #144](#)
  - Zero tolerance for harassment, accountability for PIs/Co-PIS

- **October 2018:** [Term and Condition: Harassment/Assault](#)
  - Requirement for institutions to report findings or investigations

- **February 2019:** PAPPG 19-1 [Chapter II.E.7 Workshops and Conferences](#)
  - Proposers must have a harassment policy and clear process for reporting violations

- **January 2023:** PAPPG AOR certification of a SIWE plan

**Video Resource:** [NSF Listening Session](#) Jean Feldman, NSF Policy Office at 3 min mark
New NSF Requirement

- Organizations must certify that they have a plan for creating and maintaining Safe and Inclusive Working Environment(s) for projects that include off-campus work or off-site research.

- For purposes of this requirement, NSF has defined off-campus or off-site research as data / information / samples being collected off-campus or off-site, such as fieldwork and research activities on vessels and aircraft.
NSF Policy - Background

NSF Requirements for Plan Submission

- **NSF BIO and GEO Directorates Pilot**: Several solicitations from BIO and GEO now require the submission of a plan to NSF, which will be considered as part of the Broader Impacts criteria during the review process.

- **For other NSF Directorates**: The PI / Project Team need not submit the plan to NSF for review in the proposal, but they **must** create it at time of proposal submission.
NSF Policy - Background

Alignment with U-M Policies

● NSF recognizes that a community effort is essential to eliminate sexual and other forms of harassment in science and to build inclusive scientific climates where people can learn, grow, and thrive.

● U-M’s Standard Practice Guide policies on Discrimination and Harassment (SPG 201.89-1) and Policy on Sexual and Gender-Based Misconduct (SPG 601.89) support these goals.
U-M Implementation of the Policy
U-M Plan Template

The Administrative Home must use the Safe and Inclusive Work Environment Plan template to attest there is a plan in place for a proposal that includes off-campus or off-site research.
U-M Implementation of the Policy

U-M Plan Template (continued)

The plan must describe how the following types of behavior will be addressed:

- Abuse of any person, including, but not limited to, harassment, stalking, bullying, or hazing of any kind, whether the behavior is carried out verbally, physically, electronically, or in written form
- Conduct that is unwelcome, offensive, indecent, obscene, or disorderly

U-M Resources:

- [Discrimination and Harassment (SPG 201.89-1)](#)
- [Safety, Health and Environmental Policy (SPG 605.01)](#)
The Plan Must Also:

- **Identify the steps** the proposing PI / Project Team will take to nurture an inclusive off-campus or off-site working environment

- Consider how **communications** within the team and to the organization will be handled, minimizing **singular points** within the communications pathway (e.g., a single person overseeing access to a single satellite phone)

- Address how **any special circumstances** such as the involvement of multiple organizations or the presence of third parties in the working environment should be taken into account

- Account for the process or method for making **incident reports** as well as how any reports received will be resolved
New attestation text for Unit Approvers (Administrative Home Department Approvers) to sign off that a plan has been prepared and will be disseminated if awarded.

Off-site SIWE Plan
For projects where the National Science Foundation (NSF) is the direct or prime sponsor and research will be conducted off-site or off-campus, the Administrative Home School/College/Institute/Center attests that a Safe and Inclusive Working Environment Plan has been prepared and will be disseminated to all individuals participating in the off-site or off-campus research prior to departure.
eRPM Updates Related to the NSF Policy (continued)

When “National Science Foundation” is selected as the Direct or Prime sponsor in PAF question 1.7 Sponsors and either

- “Off-Campus Research” is used for PAF question 1.8 Proposal Type/Class Code

  OR

- “Yes” is the response to PAF question 4.4 Will U-M employees be working off U-M property?
When “Off-Campus Research” is used for PAF question 1.8 Proposal Type/Class Code, new system validation requires that PAF question 4.4 Will U-M employees be working off U-M property? must be answered “Yes.”

If 4.4 is answered “Yes”, then additional instructional text will appear below question 4.4.1 Identify location(s), reminding project teams to have a documented Safe and Inclusive Working Environment plan.
Highlights of U-M Implementation

- PI / Project Team utilizes the U-M Plan Template to prepare a plan specific to each proposal that requires a plan
- Unit attests the plan exists
- ORSP will rely on unit attestation in order to certify to NSF that the plan has been created and documented as required
- If awarded, NSF expects the PI / Project Team to follow the plan based on NSF requirements and to monitor / modify the plan as needed
PI / Project Team, Unit, and RA Responsibilities
PI / Project Team Responsibilities

PI / Project Team Responsibilities at Proposal Time

- Assess whether off-campus or off-site research activities will take place
- Utilize the U-M Plan Template to prepare a plan specific to each proposal that requires a plan prior to proposal submission
- The PI must sign and date the plan
PI / Project Team Responsibilities

PI / Project Team Responsibilities at Award Time

Ensure that any individuals working on this project in an off site or off campus location receive a copy of the plan prior to commencement of their work at any off-site or off-campus location.

Tips!

- Document who received the plan and when.
- Review, update, and redistribute the plan if needed.
- Follow the plan!
Unit Responsibilities

- Unit Approvers must attest in eRPM that a plan has been prepared and will be disseminated if awarded.
- For BIO & GEO awards, if changes are made to the plan, an updated version must be uploaded to the appropriate record in eRPM.
- Some units may create / communicate / enforce additional requirements, policies, or business processes:
  - Consult your unit leadership.
Unit Responsibilities (RA)

RA Responsibilities at Proposal Time

- Call out the new requirement to PI / Project Team
- Ensure U-M template is used
- Follow any specific unit requirements (if applicable)
  - Does your unit want the plan uploaded to the PAF?
- Verify plan is completed
- Fill out PAF appropriately
- Verify “Off-Campus or Off-Site Research” box is checked on Cover Sheet in Research.gov!
Unit Responsibilities (RA)

RA Responsibilities at Award Time

- Remind PI / Project Team to review the plan
- Ask PI / Project Team if revisions to the plan are needed
- Remind PI / Project Team to distribute the plan prior to any off-site work taking place

**Tips!**

Add plan to Award record:
- Call out in Unit Terms and Conditions
- Upload plan to Unit Docs

**Job Aid:** Proposal Management: Manage Unit Documents and Unit Defined Terms and Conditions
Key Takeaways for RAs

Touchpoints with the PI / Project Team

● Initial Proposal Preparation
  ○ Explicitly ask “Will this project involve off-campus or off-site research activities?”
  ○ If yes (or maybe):
    ■ Orient PI / Project Team to new requirement and associated policies
    ■ Share U-M Plan Template

● Award Set Up and Award Management
  ○ Remind PI / Project Team of the plan and their responsibilities
    ■ At time of initial award set-up
    ■ Periodically (e.g., agenda item in annual check in?)

● This is a unit responsibility - there is no external compliance monitoring
Resources

- NSF BIO/GEO Directorates Resources
  - NSF Safe and Inclusive Working Environments Requirements Virtual Office Hour (recording and resources)
  - Frequently Asked Questions (FAQs) Regarding Preparation and Submission of Plans for Safe and Inclusive (SAI) Working Environments under the BIO/GEO Pilot

- For additional NSF and U-M resources, see the last page of the Safe and Inclusive Working Environment Plan Template
Questions & Future Thoughts

Considerations

- Collaboration with Other Institutions
  - Developing Plan
  - Carrying Out Plan
- Potential expansion to other directorates for actual submission to NSF
- Potential Reporting Responsibilities (NSF Audit Implications)
- Other Federal Sponsors’ Policies - trending!
Questions
Thank you!

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Contact the Navigate Team with questions and comments
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