

## APPENDIX B

### IMPLEMENTATION PLAN

The National Science Foundation (NSF) has taken actions to implement the recommendations contained in the National Science Board (Board) report, *Report to Congress on Cost Sharing Policies at the National Science Foundation* (NSB-08-17) of February 2008, and plans to take additional actions to implement the recommendations contained in this report.

**Completed actions** include outreach to the internal and external community and revision of specific solicitations to reflect the limited reinstatement of cost sharing, as recommended in the Board's February 2008 report.

NSF conducted training for NSF staff on the current status of cost sharing policy, as well as the role of program staff during the proposal and award process.

NSF conducted outreach to the following professional societies:

- Council on Governmental Relations (COGR);
- National Council of University Research Administrators (NCURA);
- Society of Research Administrators (SRA);
- Federal Demonstration Partnership (FDP); and
- Colleges of Liberal Arts Sponsored Programs (CLASP).

Discussions were also held in other forums such as the NSF Regional Grants Conferences, NSF Advisory Committee meetings, and at individual institutions, organizations, and conferences.

NSF reinstated cost sharing in the following programs, as specifically recommended in the Board's February 2008 report:

- Engineering Research Centers (ERC);
- Industry/University Cooperative Research Centers (I/UCRC); and
- Experimental Program to Stimulate Competitive Research (EPSCoR).

As mandated by the America COMPETES Act (P.L. 110-69), NSF implemented mandatory cost sharing in the Major Research Instrumentation Program and the Robert Noyce Teacher Scholarship Program.

In each of these programs, a new solicitation containing a cost sharing requirement was issued in 2009. Cost sharing is required for awards made as a result of these new solicitations.

**Planned actions** will fully implement the recommendations contained in this report. NSF will:

- Continue to hold institutions responsible for fulfilling *existing* cost sharing obligations on *existing* awards. Award renewals are subject to the requirements of the solicitation under which they were originally issued.
- Develop internal and external guidance to establish parameters on types of programs in which inclusion of a mandatory cost sharing requirement may be appropriate. Guidance will be developed for the internal Proposal and Award Manual (PAM) to inform NSF staff about the policies and procedures for inclusion of a programmatic mandatory cost sharing requirement. This guidance will include guidelines for the development of appropriate cost sharing requirements that take into consideration the diverse attributes of institutions (e.g., size, research intensity, character/mission).
- Review funding opportunities that include cost sharing requirements as a component of the official NSF clearance process, to ensure that the requirements are well-justified, that the methods for determining the requirement amounts are well-justified, and that the requirements fit the needs of the program. Final approval for cost sharing requirements will be granted by the NSF Director.
- Revise the NSF *Proposal & Award Policies & Procedures Guide (PAPP)* to include clear language prohibiting the inclusion of voluntary committed cost sharing. NSF will also review and make necessary changes in the guidance for the Facilities, Equipment, and Other Resources (FER) section of the Grant Proposal Guide (GPG) for consistency with Recommendation 6 in this report.
- Develop and provide internal training, including semi-annual program staff presentations and topic-specific on-line training modules, consistent with the recommendations.
- Conduct outreach to the external community, along the lines identified above, and develop an interim strategy for working with proposers to ensure that no voluntary committed cost sharing is included in proposals.
- Continue to assess the NSF cost sharing policy and report findings to the Board.