

## **NSF Grant Reporting and Publication Requirements and Expectations Information for PI's**

During the time I've worked as a program officer for the National Science Foundation, I've found myself typing nearly identical messages to the principal investigator of one grant after another, requesting revisions to annual and final reports. So, I wrote this. The quoted text comes from the NSF terms and conditions for grants issued in 2012. Grants issued in other years may have slightly different requirements, but they are substantially the same. The other comments are specific to me and the projects for which I am responsible. Projects are re-assigned to different officers over their lifetimes, so if your project is later transferred to another program officer, you should probably inquire with the new program officer about what she/he expects.

The NSF has recently converted to a new reporting system, using Research.Gov rather than FastLane. The new system imposes some new constraints on the format of reports, but does not affect the terms and conditions cited below.

### **A. Acknowledgments of Support:**

1) You are required to include an acknowledgment of NSF support in "any publication (including World Wide Web pages) of any material based on or developed under the project". This applies to "any material, whether copyrighted or not". The form of this acknowledgment is specified as follows:

"This material is based upon work supported by [name of awarding agency(ies)] under Award No. [recipient should enter the awarding agency(ies) award number(s)]."

I spot-check the publications listed in annual and final reports to see if they include such acknowledgments. If there is a good reason for not including an acknowledgment of NSF support for some publications, such as rules imposed by the publishing organization, please explain that in your report.

2) If you are interviewed, "including popular media such as radio, television and news magazines", you are required to make the same acknowledgment orally.

If I have seen that PI's often forget to pass on these requirements to their co-authors and students, who then neglect to cite all of the relevant grants in a publication. By the time I notice and complain to the PI it is too late. So, when you are working with a co-author, please provide her/him with a full list of the grants to be acknowledged.

### **B. Reporting Requirements**

1) You are required to provide me "access to, either electronically or in paper form, a copy of every publication of material based on or developed under this award, clearly labeled with the award number and other appropriate identifying information, promptly after publication".

You may comply with this by uploading copies of your publications as part of the report. However, I prefer that you do this by maintaining a website for your project, with links to electronic copies of all the publications, or by including URLs for the publications in the body of your annual and final reports. If the terms of the copyright assigned to the publisher seem to preclude public posting, you may protect the copy with an HTTP password, and include the password in your annual and final reports, or provide an unpublished URL in your report. Please include a list of the project personnel, and the project abstract, plus images and other information to inform the public about your work. If you maintain a single web page for a lab or project supported by multiple grants, please make it clear which grants support which activities. If your reports for the grant I'm monitoring list the publications supported by that grant, I can pick them out from a larger list on such a combined site.

2) You are required to file an annual technical report each year of the project. Reports are incremental: each report should be different from the one the year before, and describe only what was done that year. The final report is the annual report for the final year – not a combined report. Anyone reading the reports as a series should be able to see what was done each year, without having to compare reports to see what has changed.

The report deadlines for these are often a subject of confusion:

a) All but the final report are due 90 days \*before\* the anniversary of the grant. They become overdue at the end of this period, which means that the NSF will not process any action any grant for which the PI is a PI or co-PI until the report is not only submitted, but \*approved\* by the program officer. Program officers typically have backlogs, and are sometimes away on travel. So, you cannot count on a report being reviewed and approved immediately after you submit it. The program officer may require revisions before the report is approved. That is the reason for having a 90-day window before reports are considered overdue. Typical problems caused by overdue reports include delays in approving no-cost extensions, re-budgeting requests, and CGI funding increments.

b) The final report is due on the closing day of the grant, with a similar 90-day grace period. The same comments apply, but there is one additional pitfall for projects in their final year, if you decide you want to file for a no-cost extension. The no-cost extension retroactively moves the due date for the annual report back to 90 days before the grant anniversary, making you immediately delinquent for an annual report. However, it is worse if you request a no-cost extension after filing the final report; in that case, the final report blocks the extension. So, if you want a time extension, request it before the grant anniversary.

3) If your grant was awarded or received a supplement or incremental funding since January 4, 2010, you are required to submit a Project Outcomes Report for the General Public (PORGP) at the end of the project. The due date is the same as for the final report, as are the consequences for not submitting it. A difference is that the PORGP cannot be reviewed, edited, or approved by the program officer. Whatever you submit will be posted for the public exactly

as you submit it. You have 30 days to edit it, but after that it cannot be modified. Since this is what the public, and Congress, see as the result of the money spent for the grant, it is important that you write this carefully. Read the guidelines included in the NSF Grant Administration manual before you submit it.

### C. Writing Annual and Final Reports

Please keep in mind the purposes to which these reports are intended, and that they are public documents. Besides informing program officers about your work, they may be read by the various bodies that oversee and review the performance of the NSF, or mined for information by the NSF and other government entities. You cannot predict who will read your report, or how they will use the information. So, it is important to provide good information and provide it in a form that automated information retrieval tools as well as human readers can find whatever information they are looking for. Since Research.Gov requests information using forms with fields, it is reasonable to assume that those fields will be used in database searches. If you have relevant information it is important to put it in the right field.

The NSF is always looking for material that can be used to publicize the value the public receives for its investment in NSF research grants. One of the mechanisms the NSF uses for publicity is NSF Highlights, which are featured on the NSF website. Having your project featured as an NSF Highlight can be beneficial for you and your institution. Program officers are looking for Highlight material when they read annual and final reports. When you write your report, it would be good to think in terms of material that would go into a Highlight. If you have not done so before, you should take a look at some examples featured on the NSF home page, or click on the "Computing" link under "Discoveries" to see some examples related to computing. If you think your project is a strong candidate for a Highlight, please contact me.

From the on-line forms it is not easy for you to predict how the final report will appear when it is assembled into the PDF file that NSF officers see. If I review your report I may send you a copy of that PDF file, possibly marked up with my comments. When you see it, you may be surprised by how the information you entered into the forms is transformed into the report I see.

For every form and field provided, consider carefully whether you have any information that might be relevant, and provide it. For every field that you leave blank, the report I see will have a heading, followed by "Nothing to report" or "None reported".

The report forms include a place to enter websites, under "Products". Please do include a URL for your project's website where I can find the publications, and make this clear in the "Short Description of the Website" field. If the publications are divided across multiple websites, explain the division. Don't forget to acknowledge all of your project's funding sources, including the NSF grant number(s).

For collaborative projects and single projects with multiple PI's, please coordinate the writing of your reports. The NSF expects projects to be coordinated, from the conduct of the research through the writing of reports. Each report should be specific to the institution that submits it, but should include explanation of the interaction with the other institutions. I will be looking for indications of effective collaboration and coordination. The reports should not give the impression of a collection of individual projects.

Please do not just enter "see attached document" in any form field. Do use attachments and uploaded documents to supplement the report as appropriate, especially for graphics. When you make a reference to an uploaded document or figure, please specify enough information to allow a reader to find it, and if it has more than one page to find the relevant page or section. I have been told to enforce the rule that PDF only be used for material that cannot be expressed in text within the form structure, i.e., for material with special symbols as in mathematical formulae, and graphics.

Please structure your report in a way that makes it easy to relate the report to your proposal. When you describe your accomplishments, if your proposal broke the project into identified tasks or activities, please define the "major goals of the project" to correspond to the tasks/activities in your proposal. If you change plans, please explain the changes in goals and the reasons for the changes in your report for that year.

Likewise, if there are other changes to your project management plan, please explain them in the section for reporting changes. Do not wait until you ask for a no-cost time extension to report on delays, such as might be due to mis-alignment of the project start with the academic year hiring cycle for student assistants, difficulty obtaining equipment or other facilities, or loss of personnel or collaborators. If your project is advancing faster than expected, or if you have obtained additional funds from other sources for the project, please explain.

With regard to the above, you should expect that I will check your expenditures against the progress you have reported and against the original proposal's staffing and work plan. If it appears you are more than one year behind in spending I will expect an explanation of both the reasons and your plans for correction.

Don't forget to include in your report a description of what you have accomplished with respect to Broader Impacts. Again, refer back to the plans you described in your proposal, Include the educational and outreach goals in your list of "major goals". Then follow up by providing details on what was accomplished and what you plan to do next. If you proposed to do something, but have changed plans, please explain the changes. Education and outreach activities also are reportable under "Activities" as "opportunities for training and professional development" and "results disseminated to communities of interest", under "Products, Other Products" if they include tangible items such as courses or educational materials, and under "Impacts" with respect to "human resources", "technology transfer", and "impact on society beyond science and technology".