MEMORANDUM

TO: CSUF Faculty
FROM: Binod Tiwari, Ph.D.
Associate Vice President for Research and Sponsored Projects
SUBJECT: NSF Requirement for Safe and Inclusive Work Environment

The National Science Foundation (NSF) announced in 2023 that, effective January 30, 2023, if a Principal Investigator (PI) submits a new or renewal proposal, the NSF will require the PI to take an additional step when engaging in off-campus and/or off-site research activities, and the AOR must complete a certification that the organization has a plan in place for that proposal that describes how the following types of behaviors are addressed:

a. 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; or
b. Conduct that is unwelcome, offensive, indecent, obscene, or disorderly

This plan should also identify steps the proposing organization will take to nurture an inclusive-off-campus or off-site working environment. Please refer to the NSF PAPPG Chapter II.E.9 Safe and Inclusive Working Environments for Off-Campus or Off-Site Research. Additional resources are available at FAQs on Safe and Inclusive Work Environments Posted.

NSF’s new requirement states that there must be a plan for a safe and inclusive environment created, and distributed in advance to everyone who will participate in an off-campus or off-site research activity prior to those individuals leaving campus to engage in the off-campus/off-site research. NSF defines off-campus or off-site research as data, information, and samples being collected off-campus or off-site, such as fieldwork and research activities on vessels and aircraft.

The creation and distribution of the plan is the responsibility of the PI. However, to ease the administrative burden, the Office of Research and Sponsored Projects has prepared a template plan (attached) for PIs to use. Please note:

1. PI should not submit the plan to NSF for review unless specifically requested in the program solicitation.
2. PI should determine if the proposed research includes any off-campus or off-site research as defined by NSF.
3. PIs are responsible for maintaining and retaining a copy of the plan, as well as documentation of who received the plan (email confirmation, signup sheet, etc.) in the Office of Sponsored Programs (ASC) file, and PI or departmental grant files. These records are subject to the same retention schedule as other grant-related administrative records.
4. Plans may be re-used and re-distributed for multiple off-campus research activities but must be updated, as appropriate, to each specific grant proposal.
5. For purposes of compliance with NSF’s new requirement, the following are not considered off-campus or off-site research for purposes of this requirement:
   - Meetings and conferences that do not include data/information/samples being collected
   - Data/information/samples collected by subrecipients or collaborating organizations at their primary place of performance

6. Determinations about plan requirements must be based on the location and nature of the activities; this assessment is independent of the F&A rate determination which is based on where the preponderance of the work is performed.

7. All NSF proposals submitted to the Office of Grants and Contracts with off-campus or off-site research will require that a plan be completed and filed with the Office of Grants and Contracts before the proposal can be submitted in order to comply with the certification. For additional information, please read the instructions on the first page of the template plan.

As our commitment to Safe and Inclusive Research Environments California State University, Fullerton (CSUF) and CSU Fullerton Auxiliary Services Corporation (ASC), or collectively “University” take Discrimination, Harassment, Retaliation (DHR), Title IX, sexual misconduct, and Whistleblowers very seriously. University’s goal is to provide the campus community with education, awareness, reporting options, and meaningful assistance. Information on University’s Discrimination, Harassment, and Retaliation policy and procedures can be found at: CSUF HRDI Discrimination, Harassment and Retaliation, CSU Policy Prohibiting Discrimination, Harassment, Sexual Misconduct, Sexual Exploitation, Dating Violence, Domestic Violence, Stalking, and Retaliation (Nondiscrimination Policy), ASC 2023 Affirmative Action Reaffirmation Letter, ASC PI Handbook, Student Conduct Policy, and Student Conduct Referral. These policies apply to any university program or externally funded sponsored program, including programs that take place off-campus or in the field or on an online platform (e.g., Zoom).

For any questions or if you require additional information concerning this NSF requirement, please contact researchcompliance@fullerton.edu.