NATIONAL SCIENCE FOUNDATION (NSF) REQUIREMENT FOR SAFE AND INCLUSIVE WORKING ENVIRONMENTS

<u>Description of NSF Requirement</u>

National Science Foundation (NSF) requires for each proposal that proposes to conduct research off-campus or off-site * an institutional certification that the University has a Safe and Inclusive Working Environments Plan (Plan) in place for that specific proposal. 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
- Identify steps the proposing organization will take to nurture an inclusive off-campus or off-site working environment. (e.g., trainings, and processes to establish shared team definitions of roles, responsibilities, and culture), and
- Include the process for making incident reports and how any such reports will be resolved. The Plan must also include procedures for communications within the team and to the organization that address limited communications pathways or other special circumstances that may complicate or impede reporting of suspected non-compliant behavior

*NSF defines off-campus or off-site research activities as "data/information/samples being collected off-campus or off-site, such as fieldwork on research vessels and aircraft."

This requirement is included in NSF's Proposal and Award Policies & Procedures Guide (PAPPG) (NSF 23-1), Part I Chapter II Section E.9 available at
https://beta.nsf.gov/policies/pappg/23-1/ch-2-proposal-preparation .

NSF's Frequently Asked Questions provide additional information at
https://www.nsf.gov/pubs/2023/nsf23071/nsf23071.jsp#q2

Please note that this website highlights key requirements, responsibilities, and University processes, and is not intended to be all inclusive of the guidance provided by NSF.

<u>Required Components of Safe and Inclusive Working Environments Plan</u>

The required component of the Plan, as specified in each NSF solicitation, include all the following:

1. A description of the field setting and unique challenges for the team
2. Steps that will be taken to nurture an inclusive off-campus or off-site working environment
3. Communication processes
4. Organizational mechanisms for reporting, responding to, and resolving issues of harassment, should they arise

Submission Requirements

WHEN IS SUBMISSION OF THE SAFE AND INCLUSIVE WORKING ENVIRONMENTS PLAN REQUIRED?

The Plan is only required if off-campus or off-site research is part of the proposed project, which means data, information, or samples being collected off-campus or off-site.

Principal Investigators (PI) are responsible for determining whether the requirement applies to the proposed project.

In general, NSF does not require the Safe and Inclusive Working Environments Plan to be submitted to NSF so typically it would not be included in the proposal; however, the NSF Directorate for Biological Sciences (BIO) and NSF Directorate for Geosciences (GEO) are participating in a pilot that requires submission of the Plan with the proposal.

WHAT MUST BE INCLUDED IN NSF PROPOSALS WITH OFF-CAMPUS OR OFF-SITE RESEARCH?

All NSF proposals that meet the definition of off-campus or off-site research (stated above) must check the box on the Cover Sheet, regardless of whether the submission is to a solicitation included in the pilot.

The "Revision Notes" and "Proposal Preparation" sections of each solicitation that require submission of the Safe and Inclusive Working Environments Plan with the proposal will state if a plan is required, and if it is, the date the requirement takes effect. For those proposals, the plan is included in the proposal as a project-specific 2-page Supplementary Document that will be considered under the Broader Impacts review criterion.

WHO SUBMITS THE PLAN FOR COLLABORATIVE PROPOSALS?

If the proposal is collaborative, the lead PI is required to upload the Safe and Inclusive Working Environments Plan as a Supplementary Document and check the relevant box on the lead organization's Cover Sheet. If PIs from the non-lead organization(s) are proposing to collect data from different field locations, only one Plan that covers all off-campus or off-site research must be submitted.

Responsibilities of Principal Investigators (PI)

As the PI/PD for any proposal to NSF that includes an off-campus or off-site research component, the PI is accountable for all the following responsibilities.

- PI must follow applicable University of Kentucky policies and procedures, including but not limited to those listed below.

- PI must not to begin off-campus or off-site research prior to completing a project-specific plan and distributing the Plan to all individuals conducting or participating in off-campus or off-site research activities.

- PI must create a project-specific Plan, that addresses all NSF requirements, *at the proposal stage*. The Plan must include any circumstances unique to the project, such as the involvement of multiple organizations, the presence of other third parties, and any communication limitations (e.g., no cell and/or no internet service). The project-specific Plan must reference and summarize related University of Kentucky's policies, referenced below.

  For projects with unique circumstances, the Office of Institutional Equity and Equal Opportunity (Institutional Equity) is available to provide guidance.

  > Institutional Equity is responsible for upholding the University's commitment to equal opportunity for all members of the University's community in academic programs, research, service, and employment. Institutional Equity's website is https://ieeo.uky.edu/.

- PI must provide a copy of the Plan (and any subsequent revisions) to the College Grant Officer. At proposal stage the Plan should be attached to the IAF.
  - It should be noted that a sponsored project account will not be created by OSPA until the PI confirms that the College Grant Office has a copy of the most recent version of the Plan. Also, the PI and Department Chair must confirm their understanding of the NSF requirement at the time of award.
- The PI must distribute a copy of the Plan to each participant in the off-campus or off-site research prior to commencement of those activities.
- A copy of the Plan and documentation of the individuals who received a copy of the Plan, and the date it was delivered or received, must be maintained in the PI's sponsored project files.

Specific Instructions for NSF Principal Investigators

AT THE TIME OF PROPOSAL:

1. Determine if any research will be conducted off-campus or off-site (as defined above).

   If the answer to the question (under Project Information) on the IAF that asks, "If NSF funded, will any data/information/samples be collected off-site such as fieldwork or research activities?" is No, no further action is necessary since a Safe and Inclusive Working Environments Plan is only required for NSF-funded awards for projects containing fieldwork or research that is conducted off-campus or off-site.

   If the answer to the above question is Yes, follow the next steps.

2. Respond affirmatively to the question (under Project Information) on the IAF that asks if there will be any data/information/samples collected off-campus or off-site, such as fieldwork or research activities.

3. Develop a Safe and Inclusive Working Environments Plan for each NSF proposal. OSPA has developed a template to facilitate creation of the Plan. The template is available on the OSPA website on the Proposals tab at https://www.research.uky.edu/office-sponsored-projects-administration/proposal-preparation-submission

4. Attach a copy of the completed Safe and Inclusive Working Environments Plan to the IAF. Unless NSF directs otherwise, do not submit the Plan as part of the proposal.

   Note: NSF Directorates for Biological Sciences (BIO) and Geosciences (GEO) require submission of the Plan as part of the proposal.

AT TIME OF AWARD:

1. Provide the College Grant Officer with an updated copy of the Plan if any revisions were made after proposal submission.

2. Confirm to the College Grant Officer that the project-specific Safe and Inclusive Working Environments Plan was developed and will be distributed to all individuals conducting off-campus or off-site research activities prior to their departure for the research site.

3. Distribute a copy of the project-specific Plan to all individuals conducting or participating in the off-campus or off-site research activity before they depart for the off-campus or off-site.

   Note: PIs must also promptly distribute any revisions of the Plan to all individuals conducting or participating in the off-campus or off-site research activities.

4. Refer individuals conducting or participating in the off-campus or off-site research to the Office of Institutional Equity and Equal Opportunity https://ieeo.uky.edu/ for more information on the University's policies.

5. Retain a copy of all versions of the Safe and Inclusive Working Environments Plan as specified in UK's record retention policies.

6. Maintain a distribution list and supporting documentation (e.g., emails, sign-up sheet) showing who received a copy of the Plan and the date it was delivered or received.

Question on Internal Approval Form (IAF)

The following question has been added to the IAF and must be answered for all NSF proposals.

If NSF funded, will any data/information/samples be collected off-campus or off-site such as fieldwork or research activities?

University of Kentucky's Institutional Regulations and Procedures

The University supports a safe and inclusive working environment through the policies and procedures outlined below and complies with the new NSF Safe and Inclusive Working Environments requirement through the project-specific Safe and Inclusive Working Environments Plan authored by the Principal Investigator.

INSTITUTIONAL REGULATIONS AND POLICIES:

- GR 1 The University of Kentucky (Definition)
- GR XIV Ethical Principles and Code of Conduct
- AR 4:10 Code of Student Conduct
- AR 6:1 Policy on Discrimination and Harassment
- AR 6:2 Policy and Procedures for Addressing and Resolving Allegations of Sexual Harassment under Title IX and Other Forms of Sexual Misconduct
- AR 6:3 Environmental Health and Safety
- AR 7:1 Research Misconduct
- HR Policy and Procedures #2: Equal Opportunity, Discrimination, and Harassment
- HR Policy and Procedures #7: Grievances

REPORTING DISCRIMINATION, HARASSMENT, OR SEXUAL MISCONDUCT:

The procedures for allegations of discrimination, harassment and/or retaliation are available on the Office of Institutional Equity and Equal Opportunity website at https://ieeo.uky.edu/ .

The [Discrimination, Harassment, or Sexual Misconduct Report Form](#) may be used to make a report of discrimination, harassment, or sexual misconduct but the form is not required to make a report. A report may be made by contacting the Office of Institutional Equity and Equal Opportunity at 859-257-8927. Contact the Violence Intervention and Prevention Center at 859-257-3574 to make a confidential report of sexual misconduct.

Additional Information and Assistance

The Principal Investigator's College Grant Officer (CGO) is available to provide guidance at proposal submission for those directorates that require submission of the Safe and Inclusive Working Environments Plan with the proposal and for general questions as the Plan is developed. The CGO is unable to provide project-specific guidance about the detailed contents of the Plan.

At the time of award, the OSPA Research Administrator will ensure receipt of a copy of the Plan from the PI so a sponsored project account can be established.

Identification of CGOs by college and OSPA staff by constituency is available on OSPA's website at https://www.research.uky.edu/office-sponsored-projects-administration/ospa-staff

Thalethia Routt, Acting Associate Vice President for Institutional Equity and Equal Opportunity, and staff in the Office of Institutional Equity and Equal Opportunity are available for questions related to the University's policies and procedures. Institutional Equity's website is https://ieeo.uky.edu .