

NSF Safe/Inclusive Environment Requirements - FAQs

Question 1: What does "off-campus" or "off-site" mean. When does this new requirement apply to me? What if this only involves a day trip?

Answer: The intent of this requirement is to provide guidance and protection for participants when they do not have ready access to the on-campus in-person resources they normally do. If your participants continue to have such access, no plan is needed.

If participants are sufficiently distant from campus such that access to these resources is more limited than they would be if they were on campus (including, but not limited to, fieldwork and research activities on vessels and aircraft) then a plan is needed. Any projects that have been approved to use the "off-campus" indirect cost rate are required to have a plan.

Work from home by an individual employee would not, for the purpose of this policy, be considered "off-campus" or "off-site."

"Day trips" or excursions (e.g., to public places, schools, the state fair, a mall) where participants are returning without an overnight stay would not normally require a plan, but a plan should be created if the nature of the off-campus research activity is likely to create a larger-than-normal opportunity for harassment to occur (e.g., studies looking at sexual activities, incarcerated individuals, prior knowledge of harassment in the same setting, etc.). When in doubt, create a plan.

Attendance or presentation of research results at a conference does not require a plan; if participants will also engage in the conduct of research activities while attending a conference, a plan would be required. Meetings and conferences that do not include data/information/samples being collected are not considered off-campus or off-site research.

Data/information/samples being collected off-campus or off-site for more than three consecutive days and/or research activities that include an overnight stay do require a plan.

Data/information/samples being collected off-campus or off-site by any project team member, including team members from subrecipient organizations performing research outside their primary place of performance do require a plan.

Question 2: What does "research activities" mean? I don't do research; my NSF work is considered an "other sponsored activity?"

Answer: This new requirement applies only to research activities. NSF has defined off-campus or off-site research for the purpose of these requirements as "data/information/samples being collected off-campus or off-site, such as fieldwork or research activities on vessels and aircraft." PIs are responsible for determining whether

the requirement applies to their project or to certain activities on their project. If there happens to be a research component on an award that is characterized as an “other sponsored activity,” then the requirement would apply only to that research component.

Question 3: I forgot to send a plan to one or more participants before we left; what do I do now?

Answer: If the off-site research is still taking place, send the plan now to the participant(s).

If the off-site research is over, send an email to the Executive Director of the Office of Research and Sponsored Programs explaining the circumstances. They will confer with the PI on appropriate next steps.

NSF has not identified what corrective actions should be taken, but most likely it will involve an uninvolved third party checking with the participant to ascertain whether there were any issues that arose while off-campus that made the participant feel unsafe or needed reporting.

Question 4: Who counts as a “Participant”? Does this include subrecipient personnel? Other faculty working at the off-campus location with the PI?

Answer: It includes all Marquette University participants: employees, students, volunteers, and others working under Syracuse University’s direction (which might include contractors).

For subrecipient personnel, their own institution should have issued a plan for the off-site activity. This term and condition is flowed down as a part of the subaward agreement. PIs should verify with the PI of the subrecipient organization that this has occurred. Marquette University’s plan may be shared and adapted for use by the subrecipient.

Typically, a Marquette University PI will only assume responsibility for Marquette University participants but there may be cases where guests or participants from other entities may need to use Marquette University’s plan. This is allowed but places a special administrative burden on the Marquette University PI as these participants will not already be familiar with Marquette’s policies or practices, and special coordination across entities may be needed. It is a good idea to confer with ORSP well in advance of the off-site research as special arrangements may be needed.

Question 5: Is it possible to name a backup point of contact listed on the form?

Answer: Yes, in fact it is advisable to have a primary and a secondary point of contact available.

The Principal Investigator must be listed on the form in the “PI” box but may also be listed as the primary point of contact, or they may delegate the primary point of contact

responsibility to another individual who is present at the off-campus location. Make sure to include the cell phone and email of the alternative contact.

Question 6: What should happen if the person doing the alleged misconduct is the named point of contact?

Answer: As described above, it is helpful to list contact information for two individuals (e.g., the PI and a second delegated person) so that there is a local second point-of-contact readily available.

Assuming there is internet or cell phone service, the participant can also use one of the other reporting mechanisms to contact their supervisor or a University official responsible for handling misconduct concerns.

If the participant is unable or unwilling to notify the primary point of contact and the standard reporting options are not available, the participant may defer reporting until access is available (if they feel it is safe to do so), or approach another senior person on the off-campus team (whether or not from Marquette University) to assist them in appropriate next steps.

Question 7: I am the PI and I do have special off-site circumstances. What are my options?

Answer: PIs may devise options they believe are appropriate to the circumstances, but some reasonable options to certain known circumstances might include the following:

1. Cultural norms differ in the location where the off-campus research will take place. PIs may wish to offer a “pre-departure” briefing for participants explaining cultural norms in the off-site location (physical or touching norms, verbal styles, etc.). PIs can offer alternatives to mitigate concerns arising from cultural differences (e.g., offering to connect only in a group setting, or pairing participants so that there is less opportunity for misunderstanding.)
2. In advance of departure, PIs may wish to remind participants that they are personally available to listen to any concerns that participants may have about the off-campus research activity.
3. If the off-campus research site offers terrain, temperature, visual, auditory, or other challenges, offer to meet ahead of time with participants to discuss any special concerns they may have or accommodations they may need in order to fully participate.
4. The PI may wish to engage in regular “check-ins” with off-campus participants to ascertain whether there is anything that is impacting their full enjoyment about the off-campus research experience (physical or cultural barriers, behavior challenges, etc.).

5. Particularly in remote locations, physical circumstances may limit the ability for a participant to be separated from an individual alleged to have participated in misbehavior. Whenever possible, the participant and the individual allegedly engaging in misbehavior should be separated as completely as possible. With the participant's concurrence, consider assigning a "buddy" to help that participant feel safe as well as reduce the likelihood of a possible recurrence - particularly when complete physical separation is not feasible.

6. If there is only a single satellite phone (or equivalent) available for contact outside the group, consider having a second phone available and controlled by a different individual or ask someone from another group or from the entity being visited if participants can also approach them should need arise for a confidential call to be placed. Consider budgeting for a second phone if that is what is needed to ensure alternate access can be available. Notify participants of their options accordingly.

Question 8: I am just at the proposal stage; I don't have all the information available about where and when my off-campus research activities will occur. I will plan that more thoroughly after I am awarded. What am I supposed to do?

Answer: Use the plan document to describe as best you can the nature of the planned off-campus research activities; using "To Be Determined" or leaving blank areas you are not yet able to define. The plan may be updated at the time of award or prior to the off-campus research activity being undertaken. The plan **MUST** be updated (if updates are needed) and distributed prior to the off-campus activity taking place, but no approvals are needed to make changes. For audit purposes, make sure you retain a copy of the plan that was distributed to participants and if the plan is being stored in your departmental business office, make sure they receive a copy of the updated plan as well. Please include the plan in Kualu at the time of application as well.

Question 9: My NSF Directorate requires a different plan and they want it submitted as part of the proposal. How do I handle this? Do I have to do both?

Answer: PIs should carefully review their NSF solicitations to ascertain whether an alternative format is required for their plan. In general, the alternate plan requires a two-page supplemental document to be submitted with the proposal that includes specifics in four areas. In the event an NSF directorate requires an alternative arrangement, follow NSF's instructions rather than the general ones provided here – it is **NOT** necessary to complete the University's template in addition.

The NSF website contains valuable information about these requirements and initial NSF solicitations where these alternative arrangements exist. See:

<https://beta.nsf.gov/events/safe-inclusive-working-environments-requirements/2023-02-07>