UW-Madison FAQs on NSF Safe and Inclusive Plans for Off-Campus or Off-Site Research

A. General

1. What does off-campus or off-site research mean?

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

2. What does "off-campus" or "off-site" mean?

The intent of this requirement is to provide guidance and protection for individuals participating in research for when they do not have ready access to the on-campus, in-person resources that they normally do. If individuals continue to have such access, then no plan is needed. If the individuals are sufficiently distant from campus that access to these resources is more limited than they would be if they were on campus, then a plan is likely needed.

3. If field work is done off campus but does not require any overnight stays, will a plan be required?

Yes. The NSF does not specify any time requirement. If off-campus research is involved, a plan must be prepared.

4. What about field work where an individual is stationed at another location, such as a national lab or other permanent facility?

If the permanent facility already has policies and procedures for how to handle prohibited behaviors described in the NSF requirement for safe and inclusive environments for off-campus or off-site research, and individuals supported on our NSF award would clearly be subject to those policies and procedures, then it is not necessary to create a plan. If there is any doubt about whether individuals on our award would be subject to the permanent facility's policies and procedures, creating a plan may be prudent. Even if NSF does not require the creation of a plan, individuals working off-campus or off-site are still subject to UW-Madison policies while on work-related trips.

5. Does the Safe & Inclusive Working Environment Plan need to address conference travel?

No. The requirement applies only to research activities. (NSF has separate, related requirements about conference and travel proposals. See NSF PAPPG Chapter 2.F.9 and 2.F.11.)

6. Will UW supply a template or other resources for PIs needing to create a plan for Safe and Inclusive Working Environments for Off-Campus Research?

Yes. A template is available at <u>this link</u>. Use of the provided template is not required, though it is recommended because it is based on the guidance in the NSF PAPPG. For certain solicitations, the NSF Directorates of Biological Sciences and Geosciences require submission of a plan at time of proposal. Where required, the solicitations contain instructions for plan preparation.

7. Will RSP or OVCR approve the plan?

No. The only expectation is that the PI will upload the plan prior to proposal submission. Should a PI need assistance with creation of a plan, the <u>Office of Workforce Relations</u> may be able to assist. Also see the provided plan <u>template</u>.

8. I believe that my project involves special off-site circumstances. What are my options?

Pls may devise options they believe are appropriate to the circumstances. For assistance, Pls may wish to reach out to the <u>Office of Workforce Relations</u> for plan preparation. Some reasonable options for known circumstances might include the following:

- Cultural norms differ in the location where the off-campus research will take place. Pls 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.). Pls can offer alternatives to mitigate concerns arising from cultural differences (e.g., offering to connect only in a group setting, or pairing individuals so that there is less opportunity for misunderstanding.)
- In advance of departure, PIs may wish to remind individuals that they are personally available to listen to any concerns that individuals may have about the off-campus research activity.
- If the off-campus research site offers terrain, temperature, visual, auditory, or other challenges, explain this to participants ahead of time and remind individuals of the opportunity to request a disability accommodation through their Divisional Disability Representative within their college or division HR office. Individuals may choose to request minor adjustments directly from the PI, but they should be reminded not to disclose any medical information to the PI.
- The PI may wish to engage in regular "check-ins" with individuals participating in off-campus research 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.). It is best practice to have a second non-student employee witness conversations on sensitive topics with individual participants when possible (i.e., consider remote participation of an HR representative).

- Particularly in remote locations, physical circumstances may limit the ability for an individual participating in research to be separated from an individual alleged to have participated in misbehavior. Whenever possible, the research participant and the individual allegedly engaging in misbehavior should be separated as completely as possible. Consider assigning a "buddy" to an individual concerned about a possible recurrence, particularly when complete physical separation is not feasible. Contact an HR representative as soon as possible. In some situations, it may be necessary to send a participant home early.
- 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 research participants
 can also approach them should need arise for a confidential call to be placed. Notify
 participants accordingly.

B. Subawards or Collaborative Proposals or Multiple Off-Site Locations

1. If UW-Madison is part of a collaborative proposal, but not the lead institution, do we need to submit a plan? What if we are a subrecipient for a proposal?

Per NSF, only the lead institution will check the box on the Cover Page that Off-Campus or Off-Site research is involved. Only the lead institution will be responsible for submitting the safe and inclusive plan for off-campus or off-site research. This is similar to how the NSF handles mentoring plans or data management plans. In other words, only one plan needs to be submitted for the collaboration (either for a separately submitted collaborative proposal or for a proposal with subrecipients). The expectation is that the organizations in the collaboration will work together as necessary to prepare a plan.

2. If a proposal has multiple off-site locations, will there need to be an inclusion plan for each?

No. You should only need one plan for the proposal that might address the multiple off-site locations.

C. <u>During the Award Period of Performance</u>

What happens if a need is identified post-award to conduct off-campus or off-site research?
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If a need is identified post-award to conduct off-campus or off-site research, and there was no plan for safe and inclusive working environments developed as part of the original proposal, then the PI must develop a plan. The PI must disseminate the plan to individuals participating in the off-campus or off-site research prior to departure. The PI or departmental administrator must also share the plan with the RSP Post-Award Accountant, who will file the plan with other award records in Perceptive Content.

2. I forgot to send a plan to one or more individual participating in the research before we left campus. What do I do now?

If the off-campus or off-site research is still taking place, send the plan now to the individual(s). If the off-site research is over, send an email to RSP explaining the circumstances. RSP staff will confer with the PI and other offices 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 individual to ascertain whether there were any issues that arose while off-campus that made the individual feel unsafe or needed reporting.)

3. What should happen if the person doing the alleged misconduct is the named point of contact? Is it possible to have a backup point of contact?

Yes, in fact, it is advisable to have a primary and secondary point of contact available. Make sure and include the cell phone and email of the alternative contact.