

Frequently Asked Questions (FAQs)

Q1: What does “off-campus research activities” mean?

ANSWER: NSF has defined off-campus or off-site research for the purpose of this requirement 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, and for a project to which the requirement applies, PIs must complete a project-specific plan. Before departure to the off-site location, PIs must document that they have distributed the plan to all trip participants in off-site/off-campus research.

Q2: Who counts as a “Participant”? Does this include sub-recipient personnel participating in the research’s implementation?

Answer: All Harvard University affiliates participating in off-campus-specific research project count as participants. In many cases, off-campus research is conducted in collaboration with non-Harvard collaborators, for instance, researchers from a sub-recipient. It is important to ensure those collaborators are involved when the plans are being developed so that they are aware of the new requirement before the project starts.

Q3: I forgot to share the plan with one or more participants before we left; what do I do now?

ANSWER: If you realize this when the off-site research is still taking place, share the plan with the participant(s) as soon as you noticed the omission. If you noticed this after the off-site research is over, send an email to RAS explaining the circumstances. RAS staff will discuss with the PI on appropriate next steps. NSF has not identified what corrective actions should be taken in such circumstances, but you never know when NSF can decide to audit an institution to ensure compliance with this requirement, it is better to plan ahead.

Q4: Is it possible to name a backup point of contact listed on the plan if the PI is not participating in a particular off-campus trip?

Answer: Yes, in fact, whenever possible, it is advisable to have more than one point of contact available. The Principal Investigator must be listed on the plan in the “PI” box but may delegate the primary point of contact responsibility to a trip leader who is present at the off-campus location.

Q5: What should happen if the person doing the alleged misconduct is the named point of contact?

Answer: when it comes to reporting misconduct, it is helpful to list contact information for at least two individuals. Participants should be encouraged to report suspected and unprofessional behavior to an appropriate institutional official. Their name and phone numbers will be included in the safety plan and each participant will receive a copy prior to the trip. Participants can also report to their supervisor or their department’s Director of Administration if they feel comfortable.

Q6: Does the NSF plan apply to students or researchers attending a conference?

Answer: For NSF this policy doesn't apply to conferences; however, the spirit of professional conduct should.

Q7: For a student or researcher who may make multiple trips to the same site, does the research team have to send the plan for each trip?

Answer: One plan covering multiple trips to the same site is sufficient. The plan can be reviewed annually and updated if/when there are substantive changes. An example of changes could be conducting research at a location that is different from the previously indicated in the plan, etc.

Q8: Does the NSF plan apply to NSF GRFP [Fellowship] funded students or just to NSF grants?

Answer: The Science Division hopes and will continue to promote that these practices are adopted regardless of funding source. In terms of NSF GRFP specifically, GRFP fellowships are made in accordance with the National Science Foundation Graduate Research Fellowship [Program Administrative Guide](#). The March 28, 2023, version does not include the requirement for submission of a plan. However, if the student is participating in a field research that is subject to the NSF Policy they will be covered by the appropriate plan.

Scenarios:

S1: A student goes to MIT for 3 hours on a Tuesday to perform a TEM experiment using the microscope in their shared facility. The student returns to Harvard at the end of the session for the rest of the workday. Is a plan required in this situation?

Answer: Using a local offsite core facility (i.e., no overnight travel) would not require a field safety work under the NSF policy for two basic reasons a) this is a trip to another university as part of their routine course/research activity b) a trip without overnight stay do not require plans.

S2: A student goes to the Advanced Light Source at Lawrence Berkeley Lab for a 2-day beamtime. S/he is at the National Lab at the user facility for the full visit. Is a plan required in this situation?

Answer: Traveling to a National Lab for a multi-day visit would fall under the policy given the NSF definition of “off-site research or off-campus research” as data/information/samples being collected off-campus or off-site, such as fieldwork and research activities on vessels and aircraft. One exception to consider would be if the individual is traveling alone and is not part of a “team” that is traveling together, then a plan could be exempted. However, we strongly encourage whoever is conducting off-campus research to have a general safety plan just in case something happens while working away from campus.