

**FAQS**  
**NSF's New Requirement**  
**for**  
**Safe and Inclusive Working Environments for off-campus or off-site**  
**Research Activities**

**Last updated: 1/26/23**

**QUESTION 1: Are there exceptions to what “off-campus” or “off-site” mean for this requirement?**

*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, then a plan is needed.*

*Working from home would not, for the purpose of this requirement, 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, however, 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.).*

*Attendance or presentation of research results at a conference without engaging in research, would not require a plan; if participants will also engage in the conduct of research activities while attending a conference, a plan would be required.*

*When in doubt, create 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 your SPA Research Administrator or your SPA 2.0 Pre Award Specialist explaining the circumstances. SPA staff 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 part 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 UVM participants: employees, students, volunteers, and others working under UVM’s direction (which might include contractors). For subrecipient personnel, their own institution should have issued a plan for the off-site activity (PIs should verify with the PI of the subrecipient organization that this has occurred.) UVM’s plan may be shared and adapted for use by the subrecipient. Typically, a UVM PI will only assume responsibility for UVM participants but there may be cases where guests or participants from other entities may need to use UVM’s plan. This is allowed but places a special administrative burden on the UVM PI as these participants will not already be familiar with UVM policies or practices, and special coordination across entities may be needed. It is a good idea to confer with SPA well in advance of the off- site research should this be applicable so that special arrangements can be created.*

**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 and 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. Any concerns related to sexual misconduct or other forms*

of discrimination and harassment should be directed to the UVM Office of Affirmative Action and Equal Opportunity at 802-656-3368, [TitleIX@uvm.edu](mailto:TitleIX@uvm.edu), and online at [uvm.edu/aaeo](http://uvm.edu/aaeo).

**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. 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.*