



**National Science Foundation  
Assistance and Contract-Related Policy and Systems Issues  
During a Lapse in Appropriations  
September 29, 2023**

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This document addresses the various assistance and contract-related policy and systems issues that may arise during a lapse in appropriations of the Federal Government. NSF is providing this information as a service to our proposer and recipient communities in the hopes that it will address most of the questions you may have during this time period. Unfortunately, considerable uncertainty exists surrounding a lapse in appropriations. As a result, proposers and recipients are strongly encouraged to monitor news outlets to determine if the Federal government, and therefore NSF, is open for business.

Please be aware that, except as noted below, NSF may not be available to respond to emails or phone calls during a lapse in appropriations but will respond as soon as practicable after normal operations have resumed. NSF is committed to minimizing the negative impacts a disruption may have on the science and engineering enterprise and, as necessary, will issue follow-on guidance after normal operations resume.

**Pre-award Activities for Assistance Awards (Grants and Cooperative Agreements)**

**Proposal Preparation & Submission**

- New funding opportunities (Dear Colleague Letters, Program Descriptions, Announcements, Solicitations) may be issued until September 29th. After that time, new funding opportunities will not be posted to the NSF website until normal operations resume.
- [Research.gov](https://www.research.gov) proposal preparation and submission will be available; however, proposals will not be processed until normal operations resume.
- [Grants.gov](https://www.grants.gov) proposal preparation and submission will likely be available; however, proposals will not be processed until normal operations resume.
- [SciENCv](https://www.scienc.gov) will be available for the preparation and download of the biographical sketch and current and pending (other) support documents, however, SciENCv may not be able to respond to inquiries until normal operations resume.

## Impact on Existing Deadlines

During a lapse in appropriations, NSF will continue to accept proposal submissions pursuant to existing deadlines. Once normal operations resume, NSF will issue guidance regarding any funding opportunities that have a deadline or target date that occurred during a lapse in appropriations. Such information will be disseminated via the NSF website Research.gov, and other electronic methods.

## Review Process

- *Ad hoc* reviewers will be able to submit reviews via [FastLane](#).
- All panels scheduled to occur through September 29th will be held as planned. Panels scheduled to occur after September 29th will be cancelled and will likely be rescheduled to a later date.
- The Interactive Panel System (IPS) will be available for use through close of business September 29th. After that date, the IPS will not be accessible for use by panelists.
- Additional information will be available for panelists on the NSF website.

## Proposal Processing Time

The Foundation may not be able to meet our customer service standard of informing proposers whether their proposals have been declined or recommended for funding within six months of the deadline or target date, or receipt date, whichever is later.

## Issuance of New Grants and Cooperative Agreements

No new grants or cooperative agreements will be awarded.

## Issuance of Continuing Grant Increments (CGIs)

No new CGIs will be awarded.

## **Post-award Administration for Grants and Cooperative Agreements**

### Performance of Work

Recipients may continue performance under their NSF awards during a lapse in appropriations, to the extent funds are available, and the period of performance of the grant or cooperative agreement has not expired. Any expenses must be allowable and in accordance with the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (2 CFR § 200). During a lapse in appropriations, NSF

cannot authorize costs exceeding available award amounts or obligate additional funds to cover such costs.

## Payments

The [Award Cash Management Service \(ACM\\$\)](#) will be available for use by recipients to drawdown funds on existing awards. In the event of a lapse in government appropriations, payments will be processed on an intermittent schedule until normal operations resume.

## Project Reporting

[Research.gov](#) will be available for use by Principal Investigators (PIs) and co-PIs to submit annual and final annual project reports and Project Outcomes Reports. NSF program staff may continue to review and approve project reports through September 29<sup>th</sup>.

During a lapse in appropriations, however, for continuing grants, no new CGIs will be awarded (see above) until normal operations resume. [NSF's Public Access Repository](#) will be available to deposit peer-reviewed scholarly journal articles and papers in juried conference proceedings.

## No-Cost Extensions

- [Research.gov](#) will be available to submit both grantee-approved and NSF-approved no cost extensions (NCEs).
- Grantee-approved NCEs do not require NSF approval; therefore, assuming all business rule checks have passed, the NCE would be processed automatically, and the award date would be extended.
- NSF-approved NCEs may be processed through September 29<sup>th</sup>. After that date, NSF-approved NCEs will not be processed until normal operations resume. Recipients, therefore, are cautioned that Federal funds cannot be expended beyond the award end date.

## Award Transfer Requests

[Research.gov](https://www.research.gov) will be available to prepare and submit award transfer requests. However, these requests will not be processed until normal operations resume.

## Supplemental Funding Requests

Research.gov will be available to submit supplemental funding requests. However, these requests will not be processed, and no new supplements will be awarded until normal operations resume.

## Other Post-award Notifications & Requests

Research.gov will be available to submit post-award notifications and requests. Notifications and requests may be processed until September 29th. After that date, notifications and requests will not be processed until normal operations resume.

## **Cooperative Agreements in Support of Major Facilities**

- Recipients may continue to perform under Cooperative Support Agreements for work where sufficient funds were obligated and drawn prior to a lapse in appropriations, and where performance does not require Government support, such as quality assurance oversight or other actions required of NSF staff. Recipients will not be able to draw down additional funds during a lapse in appropriations. Additionally, the absence of NSF personnel to process administrative actions or provide needed authorizations during a lapse in appropriations does not constitute agency approval of any pending action.
- Since the cooperative nature of these agreements anticipates the need for Government involvement, once authorized by the Division of Acquisition and Cooperative Support (DACCS)/Cooperative Support Branch (CSB) in advance of a lapse in appropriations, Program staff may work with recipients to develop work plans, which upon a lapse in appropriations, may be put in place outlining the extent and time duration that operations are to continue in the absence of NSF oversight and direction.
- For Construction Stage award activities, even if funds are available, recipients may continue work only up to the point at which the substantial involvement of NSF staff is required. At which point, recipients shall contact an excepted Grants and Agreements Officer for guidance. If feasible, NSF will provide the required substantial involvement. If that is not possible, recipients must minimize expenditures while taking such steps to orderly suspend these activities in a manner that does not imminently threaten the safety of human life or the protection of property.

## Payments

The [Award Cash Management Service \(ACM\\$\)](#) will be available for use by recipients to drawdown funds on existing awards. In the event of a lapse in government appropriations, payments will be processed on an intermittent schedule until normal operations resume.

## Excepted Personnel

DACS/CSB has a limited number of staff members designated to address emergency situations that arise with respect to Major Facilities that endanger life or property.

## Contracts

Given the nuances of contractual requirements and administration, DACS is providing separate guidance to NSF staff regarding a lapse in appropriations. Contracting Officer Representatives (CORs) or other program office personnel responsible for technical oversight of contracts should contact the cognizant DACS Contracting Officer with any questions on the how individual contracts will operate during a funding lapse based on the specific circumstances of the award (e.g., whether it includes excepted activities, availability of funds, on-site versus off-site performance and other matters that will impact this decision).

## Payments

Invoice payments will be made during a lapse in appropriations for contracts that have been previously awarded. Payments for invoices can be made if the obligated funds are multi-year or no-year or (if such funds have lapsed) because of the continued availability of funding, as provided in 31 U.S.C. § 1553(a), for making disbursements on amounts previously obligated and for which funds are available based on a prior obligation. CORs or other program office personnel responsible for technical oversight of contracts and/or payment of invoices should ensure invoices are properly disposed of (i.e., approved for payment or rejected) as part of orderly shutdown activities. Those responsible for payment should ensure they can access the Invoice Processing Platform (IPP) system prior to and during a lapse in appropriations.

## Excepted Personnel

DACS has assigned Contracting Officers to support contract-related excepted activities during a lapse in appropriations.