

PUBLIC COMMENTS ON
NSF BUSINESS SYSTEMS REVIEW (BSR) GUIDE, DRAFT
JANUARY 2022
WITH NSF RESPONSES
May 31, 2022

Public Comments on Business Systems Review (BSR) Guide January 2022 & NSF Responses

Cmt #	Section & page number	Source	Comment	NSF Response/Resolution
1.	Summary of Significant Changes, Page ii	NSF BFA-DACS	<p>I noted that one of the changes, in Appendix A, is that under Principle 4 of Award Management, three questions were added related to partnerships with foreign collaborations. But there is a fourth question added to that section that wasn't in the previous version. It's the first bullet point, "What mechanisms does the Recipient have in place to monitor the NSF award, websites, publications, and policy issuances to keep current and to manage the statutory and national policy requirements included in the Federal award?"</p> <p>I took a closer look and the first half of the question was in the previous version in Principle 2 of Award Management. In the October 2020 version of the document it's worded as follows: "What mechanisms does the Recipient have in place to monitor the NSF award, websites, publications, and policy issuances to keep current? What is the process for distributing the information on the award compliance issues within the Major Facility?" The second half of the question is still in Principle 2 in the revised version, just the first half was moved to a new area and had a new second half added on. From what I can tell, the part of the question about manage statutory and national policy requirements wasn't included in the previous version from October 2020 and is new. If so, does it need to be listed in the proposed changes section?</p>	<p>Accepted.</p> <p>The revisions referenced in the Comment have been identified in the <i>Summary of Significant Changes</i> section under Appendices.</p>
2.	Part II, Page 15	NSF BFA-LFO	What are the Content Specialist responsibilities listed on Page 15 associated with?	<p>Accepted.</p> <p>The format of this section has been revised to clarify the Content Specialists responsibilities as part of the activities in execution of the desk review and site visit.</p>
3.	Appendix A.1, Page 45	Mantech	PG. 45 of the BSR Guide, GM Principle 4, Practice 4.2 check citations 334-338 for applicability to associated practice. The list of CFR citations go beyond the practice and can be paired down.	<p>No change.</p> <p>The list of CFR citations was not changed from the previous version of the BSR Guide. Only the numbering of the citations was updated to align with the current Uniform Guidance.</p>
4.	Appendix A-4, Page 61	Mantech	FM 2 in the Questions list, terms should be standardized, cost segregation plan, segregation of funding plan (RIG).	<p>Accepted.</p> <p>The term "cost segregation plan" was revised to "Segregation of Funding plan".</p>

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5.	Appendix A-6, Pages 68 - 74	NSF BFA-DACS	The BSR Guide should address the requirements of the “Made in America” and “Build America, Buy America” terms and conditions in the procurement section of the revised BSR.	Accepted. The Infrastructure Investment and Jobs Act (IIJA) was added to the list of citations for Procurement practices 2.7, 5.1, and 6.2. A question was added under Principle 5.
6.	Appendix A-6, Pages 71 & 72	Mantech	PR 3 several questions need to be moved to Award management, bullet 3 and 4. Bullet 3 needs to move to PR 5.	No change. Award management is for the Recipient award & Subrecipient subawards not contracts. The Research Infrastructure Guide (RIG), Section 4.2.2.4, provides a link to “Subrecipient vs. Contractor Checklist” to determine the difference between a subaward and a contract.
7.	Appendix A-6, Pages 72 & 73	Mantech	PR 5, There are four questions that belong in PR 6.2 and 6.3	Accepted. Four questions were moved from Principle 5 to Principle 6.
8.	Appendix A-6, Pages 73 & 74	Mantech	PR 6 Questions include duplicate questions that are apart PR7, remove duplicate questions from 6 and retain questions in 7.	Accepted. Four questions were deleted from Principle 6 under Procurement.
9.	Appendix A-7, Page 76	Mantech	PM Principle 3.2 citations should be added 200.312, 314, and 315	Accepted. Citation 200.315 was added. Citation 200.312 is already listed. Citation 200.314 was not added as it deals with supplies.
10.	Appendix A.7, Page 76	Mantech	200.312 Citation should be added to PM practice 3.2 to point the CSs back to acquisition costs.	No change. The Citation 200.312 was already included in the previous version of the BSR Guide.
11.	Appendix A-7, Pages 78 & 79	Mantech	PM Principle 4 Questions bullet 9 and 10 are duplicate of PM Principle 5 Questions, bullet 2 and 3. Retain questions in PM Principle 5, remove from PM Principle 4.	Accepted. Duplicate questions were deleted from PM Principle 4.
12.	Appendix C, Page 81	NSF BFA-LFO	There are a couple “empty” blue boxes on page 81. What is the purpose of these “boxes”?	Accepted. No purpose - these “boxes” were removed.