

Comments Submitted in Response to the draft Federal Register version of NSF 20-1, NSF Proposal & Award Policies & Procedures Guide (PAPPG)

Number	Comment Source	Topic	PAPPG Reference(s)	PAPPG Page Numbers	Comment	NSF Response/Resolution
1	Individual Submitter University of South Carolina Engineering and Computing	Current and Pending Support	II.C.2.h	II-23	The PAPPG says "A separate current and pending support pdf file, or other approved NSF template, must be uploaded in FastLane for each individual designated as senior personnel." There is to my knowledge no currently approved NSF Template available. As NSF is moving towards standardizing documents, it would be very helpful to give guidance on or provide a template for current and pending support to be consistent with your other efforts. Thank you so much for all that you do and I appreciate the opportunity to provide input.	Thank you for your comment. With the creation of an NSF-approved format for both the Biographical Sketch and Current and Pending Support in partnership with NIH's SciENcv system, investigators will have one central place to enter and update their biographical and current and pending support information and generate an NSF-approved document for submission with a proposal. The NSF-approved biographical sketch and current and pending support documents, generated by SciENcv, will facilitate the proposal review process as the information required for review will be in a standard format for Foundation staff to evaluate.
2	Individual Submitter Oregon State	Biographical Sketch	II.C.2.f	II-13	I recently received the proposal to use SciENcv for NSF proposal and tried it out. I find that the citation upload assumes one is a biomedical scientist and does not support any (as far as I can tell) bibliographic formats such as bibtex used in the mathematical or physical sciences. Commercial services such as Endnote are supported. I strongly suggest that the NSF request that SciENcv support open-source bibliographic systems such as bibtex so as not to disadvantage those working in the physical and mathematical sciences and not privilege commercial vendors such as EndNote. I am not able to comment for those in the social science who likely also do not have their papers in PubMed and may use different bibliographic formats but I can assume they will also bear an unanticipated burden from this change.	Thank you for your comment. NSF continues to work with NIH to address issues identified through this comment process, as well as other feedback that we have received from users.
3	Individual Submitter University of California, Irvine	Definitions			Please consider adding a definition for underrepresented minorities to the PAPPG. The PAPPG makes statements that Broader Impacts should discuss URMs, however, the PAPPG does not provide a definition to explain which racial and ethnic groups are and are not included in the NSF definition.	Thank you for your comment. The PAPPG is not the appropriate NSF guidance document to provide a definition for underrepresented minorities. Any such definition will appear in the applicable NSF program solicitation based on programmatic intent.
4	Individual Submitter University of California, Irvine	Who May Submit Proposals	I.E	I-4	Please consider adding an explicit statement in chapter 1, section E about "Who may submit applications" to NSF that involves one's status as a US citizen, permanent residents, non-citizen, etc. The added language would explain, for example, whether a non-US citizen who is employed at a IHE is eligible to submit a proposal to NSF.	Thank you for your comment. The PAPPG contains a list of what organizational types are eligible to submit proposals in Part I, Chapter 1. With the exception of NSF's fellowship programs, or as specifically stated in an NSF solicitation, proposals must be submitted by an organization.
5	Individual Submitter University of California, Irvine School of Education	Biographical Sketch	II.C.2.f	II-13	Please continue to allow the upload of PDF documents in FastLane. Eliminating this option would create an unacceptable burden when submitting grants.	Thank you for your comment. With the creation of an NSF-approved format for both the Biographical Sketch and Current and Pending Support in partnership with NIH's SciENcv system, investigators will have one central place to enter and update their biographical and current and pending support information and generate an NSF-approved document for submission with a proposal. This centralized system eliminates the need to enter this data into FastLane for each proposal submission. The NSF-approved biographical sketch and current and pending support documents, generated by SciENcv, will facilitate the proposal review process as the information required for review will be in a standard format for Foundation staff to evaluate.

6	Individual Submitter New Jersey Institute of Technology	Proposal Contents Project Description	II.C.2.d	II-11	<p>In the introduction to the proposal it is very common for the PIs to create a sandbox environment, where an important problem exists, and they are proposing the only solution out there that can fix it. As an illustrative example, I read a proposal about a point-of-care device that could test the blood type of a person in a remote area. Every reviewer on the panel who read the proposal gave it "very good" and "excellent" reviews. I, on the other hand, could not believe that this is novel. So I googled, and the very first hit came up with a product that was commercialized back in 2010: https://www.medgadget.com/2010/05/aborhcard_credit_cardsized_blood_group_determinator.html</p> <p>You can even buy similar products online for very cheap: https://www.iherb.com/pr/D-adamo-Blood-Typing-Kit-1-Easy-Self-Testing-Kit/46330?gclid=EAlaIqobChM12KG7q_fQ4gIVxo-zCh11eQA0EAYYyABEgIvWfD_BwE&gclidsrc=aw.ds Whereas, the device being proposed required bulky expensive external equipment, was only "semi portable", and offered no apparent advantages. The moral of the story is that reviewers are often not diligent enough to search for what has been done on their own.</p> <p>Therefore, I recommend that NSF enforce a requirement for the PIs to include a literature review, showing how their technology or idea is novel compared to the existing approaches.</p> <p>Since NSF does not have a citation format requirements, many PIs use the "numbered" citation in the Project Description. Although this makes sense, because it is more compact, it also does not show the year of the publication being cited. The problem with this is that the reviewers are not always diligent enough to take the extra step and look into the References section, in order to make sure to make sure that the literature review is up to date. I have seen examples, where literature reviews outdated by as much as a decade were used. A simple fix for this would be to enforce the (author name, date) citation formation: for example, (Voronov et al, 2019). This makes it immediately apparent whether the literature cited is current or not.</p>	Thank you for your recommendation.
7	Individual Submitter New Jersey Institute of Technology	Project Summary	II.C.2.b	II-10	<p>For one reason or another, the Fastlane website allows the PIs to upload their own Project Summary in PDF format, if they are using special symbols. This offers several advantages when compared to entering it into the webform fields that Fastlane provides for the summaries without any special symbols: 1) Word count requirements can be circumvented, as long as the text fits onto a single page; 2) Text formatting becomes available, so these summaries typically look much nicer than the unformatted ones submitted via the webform; 3) The PI doesn't have spend time fighting the Fastlane website, whose word-count is often buggy, and does not agree with what is provided by MS Word. For these reasons many PIs abuse the policy, and upload their own summary, even when they do not have special symbols. Even several sample proposals shown at this CAREER workshop that I just attended are examples of such abuse: http://129.130.42.171/NSF2019/main.html</p> <p>And many inexperienced individuals in the audience were confused about why some Project Summaries shown to us look better than the others. Furthermore, the NSF Program Officers, do not view this as significant enough offense to disqualify a proposal. Yet, I believe it is unfair, because my proposal has been disqualified for less: once, I forgot to include the section heading for "Broader Impacts", even though the actual text for it was there.</p> <p>Therefore, I believe it would only be fair if you either disallow the practice of uploading your own summaries altogether, or alternatively allow everyone to do so (even if they do not have special symbols). Otherwise, you have some people who are using it to gain unfair advantages, while the ones who follow the rules become disadvantaged.</p>	Thank you for your comment. New proposal preparation methods are now being piloted in Research.gov. If this method continues to be successful, the <i>Proposal & Award Policies & Procedures Guide</i> will be updated to reflect this method when all proposals can be submitted in the new system.

8	Individual Submitter University of Illinois	Merit Review	III.A	III-1	<p>NSF makes funding decisions based on a peer-review process. The peer-review process typically calls upon academic and industrial experts to evaluate the creativity of proposed research and the value of the knowledge that would ensue from its support. Over the years, NSF has used a variety of criteria to evaluate proposals for funding. Prior to 1997, there were four peer-review criteria: Research performer competence; Intrinsic merit of the research; Utility or relevance of the research; Effect on the infrastructure of science and engineering. The theme of these criteria centered on “advancing the frontiers of knowledge.” Under concerns raised by the efficacy of the review process based on these four criteria, the National Science Board (NSB), the entity that sets policies for NSF, recommended changes resulting in a reduction from four down to two peer-review criteria: Intellectual merit, to capture the knowledge created by the research, and Broader Impacts, to capture the societal benefits that would accrue from NSF supported research investments. This change was enacted into law by the 114th Congress, with the American Innovation and Competitiveness Act. As with many actions, the laws of unintended consequences may yield the dominate effect.</p> <p>As an academic who has been supported by NSF funding, has sat on NSF review panels, led an NSF sponsored workshop on enhancing Broader Impact, and served as a Program Director at NSF as a rotator (while on leave from my university faculty position), I appreciate what NSF does, and value the contributions that it has made to our nation’s well-being. Indeed, I have personally benefited from the existing NSF funding model and peer-review process. I also believe that having two criteria for evaluating research proposals for support is fundamentally flawed, and limits the potential value of what NSF can achieve.</p> <p>When presented with two objectives, human nature inherently prioritizes them, based on internal biases or external values. Given two criteria to assess the value of a research proposal, researchers and reviewers implicitly place a priority on one criterion over the other. This is manifested in one criterion being optimized (the primary) and the other criterion meeting a threshold or being used as a tie breaker (the secondary). With few exceptions, Intellectual Merit serves as the primary and Broader Impacts serves as the secondary. The result of this hidden hierarchy is that the full value of NSF investments is not being fully realized. Does this mean that NSF is funding low</p>	Thank you for your comment and for sharing your perspective.
9	Individual Submitter University of California, San Diego, Chemistry and Biochemistry	Biographical Sketch / Current & Pending Support	II.C.2.f II.C.2.h	II-13 II-23	<p>Do I read this correctly that we will only be able to fill in form boxes for bio sketches and C&Ps with this revision? This would be a huge administrative burden. These two documents change little from one proposal to the next, and it’s a great advantage to just be able to modify the last file with any updates and upload the PDF. Some PIs have upwards of 20 current/pending awards, and entering these all into the form one by one would take upwards of an hour, vs modifying a Word file and uploading the PDF, which takes 5 minutes.</p> <p>I appreciate the clarifications in the C&P section, but would appreciate even further detailed clarification on what to enter when the PI has no effort budgeted on a particular award, as well as a statement that entering effort on the C&P when no effort is budgeted does not constitute cost share.</p>	Thank you for your comment. With the creation of an NSF-approved format for both the Biographical Sketch and Current and Pending support in partnership with NIH’s SciENcv system, investigators will have one central place to enter and update their biographical and current and pending support information and generate an NSF approved document for submission with a proposal. This centralized system eliminates the need to enter this data into FastLane for each proposal submission. The NSF approved biographical sketch and current and pending support documents, generated by SciENcv, will facilitate the proposal review process as the information required for review will be in a standard format for Foundation staff to evaluate.
10	Individual Submitter Oklahoma State University	Biographical Sketch	II.C.2.f	II-13	<p>Comment: as Research Administrators, we are responsible for preparing a massive volume of NSF proposals each year. The inability to upload a PDF file for a bio sketch will create an undue increase in time needed to prepare each of these proposals. This is something we have already experienced with the Project Summary.</p> <p>Simply stated, copying and pasting into the Project Summary form is rarely without its problems. What fits into one page on a Word document doesn’t always fit in the Project Summary form. Additionally, there are issues of special characters, loss of italicization (for bacteria names, animal species, etc.), and punctuation being changed to question marks. We would experience a significant increase in occurrence of these problems if the same protocol (or similar) were used for the Biosketches. For instance, many PIs have special characters in their names or in the names of the universities they have attended, not to mention the punctuation marks used in the Products and Synergistic Activities sections.</p> <p>Furthermore, there is the issue of the number of biosketches uploaded for each project. The issues we face on the Project Summary form are for a single document on each proposal submission. However, those issues would be compounded exponentially with the inability to upload biosketch PDF. It is not unusual to work on proposals where there are 20 total PIs, co-PIs, and Senior Personnel. That is 20 biosketches that had to be uploaded. Now, imagine copying and pasting the biosketch material for each of those 20 people and having to scan the Fastlane/Research.gov formatted text for characters or grammar that had been turned in to question marks. The resulting increase in preparation time would be excessive and unnecessary.</p> <p>If NSF would like to move toward a more streamlined version of the biosketch that obliges PIs to comply with guidelines, I recommend a fillable PDF form (much like the PHS SF 424 forms). Such a fillable form would allow for total compliance with guidelines since they can be “locked down” for editing anything other than adding text in the allowable fields. Furthermore, this would streamline the preparation process for Research Administrators and PIs that would not be available if copying and pasting were the method of choice.</p>	Thank you for your comment. With the creation and implementation of an NSF-approved format for both the Biographical Sketch and Current and Pending support in partnership with NIH’s SciENcv system, researchers will have one central place to enter and update their biographical and current and pending support information and generate an NSF-approved document for submission with a proposal. This centralized system eliminates the need to enter this data into FastLane for each proposal submission. The NSF-approved biographical sketch and current and pending support documents, generated by SciENcv, will facilitate the proposal review process as the information required for review will be in a standard format for Foundation staff to evaluate.

11	Individual Submitter Oklahoma State University	Current and Pending Support	II.C.2.h	II-23	<p>Comment: My comment on the Current and Pending is very similar to the concerns I have regarding the biosketch changes. To reiterate, each project may have many, many personnel listed. Each of these personnel may have anywhere from 3-4 to upwards of 15 (or more) entries for a single person's Current and Pending. Using the existing form available Fastlane/Research.gov to list each person's projects is unwieldy and time consuming. That is why the preferred method at my institution is to upload a PDF list. Uploading a PDF is quick and efficient, especially considering that each proposal submission requires a Current and Pending file for each senior personnel listed on the project, which can be quite a lot of people in some cases.</p> <p>Additionally, using the existing Current and Pending form in Fastlane is inefficient because we cannot save that data to be updated for the next proposal. Instead, it must be reentered again from scratch for each person's projects on each new proposal submission, which places an undue burden on the individual filling out that information for the personnel on the project, be it the PI or the Research Administrator.</p>	Thank you for your comment. With the creation and implementation of an NSF-approved format for both the Biographical Sketch and Current and Pending support in partnership with NIH's SciENcv system, researchers will have one central place to enter and update their biographical and current and pending support information and generate an NSF-approved document for submission with a proposal. This centralized system eliminates the need to enter this data into FastLane for each proposal submission. The NSF-approved biographical sketch and current and pending support documents, generated by SciENcv, will facilitate the proposal review process as the information required for review will be in a standard format for Foundation staff to evaluate.
12	Individual Submitter University of California Riverside	Preliminary Proposals	I.D.2	I-3	Preliminary Proposals, indicates that one purpose of a preliminary proposal is to reduce the amount of effort involved at this early stage of the process. To fulfill that objective, NSF should enable the PI to submit a preliminary proposal rather than requiring submission through the AOR, which entails quite a bit more effort.	Thank you for your comment. While NSF always considers administrative burden in the proposal and award process, proposals are submitted by organizations, and, not individuals.
13	Individual Submitter University of California Riverside	Proposal Pagation Instructions	II.B.1	II-2	Proposal Pagation Instructions, notes that Fastlane does not automatically number pages. You might also want to mention that Research.gov does. I haven't done a Research.gov proposal yet, but I understand that the system won't accept a document that has headers or footers. (This, of course, makes the two systems absolutely incompatible; a proposer must decide from the first day which system to use, and changing midstream is impossible and discourages the migration to Research.gov.)	Thank you for your comment. Given that the proposal submission capabilities of Research.gov is still in the implementation phase, NSF has not incorporated specific proposal preparation language in the PAPPG at this time regarding Research.gov. Please note that while on-screen instructions in Research.gov may vary from what is stated in the PAPPG, the content requirements stay the same. The on-screen instructions in Research.gov must be followed.
14	Individual Submitter University of California Riverside	Current and Pending Support	II.C.2.h	II-23	Current and Pending Support, tells us in the margin what you won't accept, but it doesn't yet tell us what you will accept.	Thank you for your comment. Upon publication, NSF will provide a link to a webpage that specifies all NSF-approved templates for use in preparation of both the biographical sketch and current and pending support. With the creation of an NSF approved format for both the Biographical Sketch and Current and Pending support in partnership with NIH's SciENcv system, investigators will have one central place to enter and update their biographical and current and pending support information and generate an NSF-approved document for submission with a proposal. This centralized system eliminates the need to enter this data into FastLane for each proposal submission. The templates identified have been developed to ensure compliance with NSF formatting requirements.
15	Individual Submitter University of California Riverside	Collaborative Proposals	II.D.3.a II.D.3.b	II-27	The instructions on collaborative proposals) should be corrected and harmonized with the development of Research.gov. Right now, PAPPG calls for collaborative proposals submitted by multiple organizations to have the prefix "Collaborative Research:" in the title. This instruction does not apply to a collaborative proposal submitted by a single organization. However, as we learned at the NSF regional meeting in Los Angeles last month, Research.gov's new module for collaborative proposals submitted by a single organization will have the prefix built into the title. Therefore, any collaborative proposal submitted through Research.gov in the foreseeable future will automatically not conform to the PAPPG instructions.	Thank you for your comment. New language has been added to the revised version of the PAPPG submitted to OMB for final clearance to address this issue.
16	Individual Submitter University of California Riverside	Miscellaneous Comment	N/A	N/A	The entire document should be more careful with the word "should." If you mean "must," then say "must."	Thank you for your comment. NSF concurs that clarity is vital to understanding the Foundation's proposal and award requirements. For this reason, NSF has conducted an analysis of the should/must language as stated in the PAPPG and our current requirements are accurate as stated.
17	University of Central Florida	Table of Contents	i-vii	N/A	Since the ToC goes into depth in with some sections (like linking to the "Biographical Sketches" subsection "Appointments"), I recommend having similar links added to the ToC that link to subsections within the "Special Information and Supplementary Documentation". Specifically, I think it would be very helpful to call out the subsections Data Management Plan, Letters of Collaboration, and Postdoctoral Mentoring Plan in particular, since they are present in many proposal submissions and two of those sections are also directly noted in the "Sections of the Proposal" overview in the PAPPG.	Thank you for your comment. The Foundation concurs and has modified the ToC in the revised version of the PAPPG submitted to OMB for final clearance to incorporate this feedback.
18	University of Central Florida	Proposal Font, Spacing and Margin Requirements	II.B.2.	II-3	<p>Since margins are explicitly discussed in this section, I recommend also moving the pagination instructions to this section, since that is margin-specific guidance.</p> <p>Also, something that may be very helpful to specify regarding fonts is the Character Spacing. Using Advanced Options, it is possible to adjust the scale of characters and spaces between them in such a way as to fit a notable amount of additional text within the same area, while staying "officially" an acceptable font type/size and line space. Making Character Spacing set to 100% scale and normal spaced (not condensed) would address this issue.</p> <p>Here is an article on Character Spacing from Microsoft Word: https://support.office.com/en-us/article/change-the-spaces-between-text-e9b96011-1c42-45c0-ad8f-e8a6e4a33462</p>	Thank you for your comment. New proposal preparation methods are now being piloted in Research.gov. One of the changes in this system from FastLane is that proposers no longer need to paginate their documents prior to upload. The revised version of the PAPPG submitted to OMB for final clearance has been updated to reflect this method when all proposals can be submitted in the new system.

19	University of Central Florida	Collaborators and Other Affiliations	II.C.1.e.	II-5	<p>In the last year, the COA template changed multiple times as adjustments needed to be made. I would recommend the following changes to this section of the PAPPG:</p> <p>(1) Removal of detailed COA table instructions in the PAPPG in case additional changes are necessary next year, and instead refer them with a link to the designated COA webpage. This would be similar to how directorate-specific guidance on Data Management Plans contains the relevant note and link.</p> <p>(2) On the COA template, it would be very helpful to have a “last updated” stamp in the COA template instructions within the template file. That will ensure that Research Administrators are using the most recent version available.</p>	Thank you for your comment. The Collaborator and Other Affiliations template was initially issued as a pilot, with updates incorporated to resolve issues identified by the user community. NSF acknowledges that these changes may have caused some confusion; but each new revision improved the usability of the template. Since that time, the document was formally incorporated as a requirement for use in the PAPPG and the level of revision necessary has decreased significantly.
20	University of Central Florida	Biographical Sketch	II.C.2.f.	II-13	<p>Synergistic Activities – The section notes “Examples with multiple components are not permitted.” I recommend also clarifying whether examples with multiple components would be grounds for return without review.</p> <p>Appointments – In this section, I recommend clarifying the wording slightly to the following: “A list, in reverse chronological order by start date, of all the individual’s academic/professional appointments beginning with the current appointment(s).” That way, individuals with multiple current appointments (starting at varying times) as well as past (non-current) appointments have more clarity as to the proper order.</p> <p>I also have a question - Can the appointments be separated by academic and professional type, or should they be a combined list?</p>	Thank you for your comment. 1. Failure to comply with this, and any requirement established in the PAPPG, will result in a proposal being returned without review. 2. This comment has been incorporated into the revised PAPPG submitted to OMB for final clearance. 3. It is a combined list, by date.
21	University of Central Florida	Current and Pending Support	II.C.2.h	II-23	<p>The section tells people to follow the NSF-approved format. To help make sure this occurs, I request that the following outdated NSF-hosted file either be taken down or modified to state that it is no longer an approved format by NSF (the outdated template online at NSF’s website does not follow current font or margin requirements): https://nsf.gov/pubs/2000/nsf003/nsf003.doc</p> <p>Note: when someone searches NSF Current & Pending template in Google, this is among first results that appears.</p>	Thank you for your comment. This comment has been addressed in the revised version of the PAPPG submitted to OMB for final clearance.
22	National Academy of Sciences	Broader Impacts	II.C.2.d	II-11	<p>On behalf of the National Academies of Sciences, Engineering, and Medicine, I am writing in response to a request for public comment in Vol. 84, No. 103 of the Federal Register regarding revisions to the NSF Proposal and Award Policies and Procedures Guide (PAPPG). I encourage NSF to add “use of science and technology to inform public policy” (or similar language) as one additional example in the Broader Impacts section of the PAPPG. This addition would acknowledge and highlight the importance of NSF-supported researchers’ participation in informing public policy as an activity that is deeply relevant to NSF’s mission to promote the progress of science; to advance the national health, prosperity, and welfare; and to secure the national defense.</p> <p>NSF researchers are involved in guiding public policy in many ways, such as by participating in JASON activities, federal agency advisory boards, state regulatory bodies, and many other advisory groups. At the National Academies of Sciences, Engineering, and Medicine (NASEM), more than 5,500 scientists and engineers volunteer their service on approximately 500 committees annually. NSF-supported research is a primary route to develop a deep and broad cadre of experts. In turn, their research expertise informs and shapes the future of their disciplines through, for example, participation in decadal surveys that establish priorities to guide research expenditures by federal research agencies and Congress. Their expertise also provides the scientific information and up-to-date evidence that guide a wide range of public policy decisions with societal impact ranging from air pollution to the security of voting machines.</p> <p>Adding “use of science and technology to inform public policy” will highlight for NSF proposers that NSF does value when science and technology expertise can be applied to public policy activities at the national, state, and local levels to benefit society. We at the National Academies encourage NSF to make this broader impact explicit by mentioning it in the Broader Impacts section of the PAPPG.</p>	Thank you for your comment. This comment has been incorporated into the revised version of the PAPPG submitted to OMB for final clearance.
23	NSF OIG	Introduction Foreword	Introduction	x	<p><i>When NSF Grant General Conditions or an award notice reference a particular section of the PAPPG, then that section becomes part of the award requirements through incorporation by reference.</i></p> <p>This sentence is confusing in light of the preceding sentences, which state, “Part II of the NSF Proposal & Award Policies & Procedures Guide sets forth NSF policies regarding the award, administration, and monitoring of grants and cooperative agreements. Coverage includes the NSF award process, from issuance and administration of an NSF award through closeout. Guidance is provided regarding other grant requirements or considerations that either are not universally applicable or do not follow the award cycle.” NSF General Grant Conditions require recipients to comply with NSF policies (NSF General Grant Conditions, Article 1.d.2), which are set forth in this document. The sentence in question could wrongly lead one to believe that only sections of the PAPPG specifically mentioned in award terms and conditions need to be followed. We strongly suggest that this sentence be removed.</p>	Thank you for your comment. In large part, the PAPPG provides guidance and explanatory material to proposers and awardees. Therefore, it would be inappropriate to impose on NSF awardee organizations the requirement to comply with all such guidance and explanatory material as terms and conditions of an NSF award. NSF strongly believes that the terms and conditions specified in the Foundation’s grant conditions clearly articulate the parts of the PAPPG that are indeed requirements imposed on an awardee, and, for which they will be held responsible.
24	NSF OIG	Definitions	Introduction 10. OIG	xix	Remove the word “the” from “Office of the Inspector General”; the name is “Office of Inspector General”.	Thank you for your comment. The comment has been incorporated into the revised version of the PAPPG submitted to OMB for final clearance.

25	NSF OIG	Full Proposals	I.D.3.	I-4	Authors other than the PI (or any co-PI) should be named and acknowledged. We recommend NSF specify a location for author acknowledgement, for example, as the first entry in the Bibliography. OIG regularly receives queries from both POs and PIs regarding where in the proposal authors not named in the cover sheet should be acknowledged. Clearly stating where such information should be specified would help alleviate confusion and ensure that such information is included and readily identifiable within the proposal.	Thank you for your comment. Given that this would constitute a policy change, it would require more internal and external communication, including posting in the Federal Register for public comment, prior to implementation.
26	NSF OIG	Definitions	I.D.3.	I-4	Allegations of research misconduct are taken seriously and are investigated by NSF's Office of the Inspector General (OIG). Remove the word "the" from "Office of the Inspector General"; the name is "Office of Inspector General".	Thank you for your comment. The comment has been incorporated into the revised version of the PAPPG submitted to OMB for final clearance.
27	NSF OIG	Exceptions to Deadline Date Policy	I.F	I-7	Proposers should then follow the written or verbal guidance provided by the cognizant NSF Program Officer. We suggest that approval for exceptions to the deadline date policy only be provided in writing rather than also allowing for the option of verbal approval. Alternatively, we recommend that any verbal approvals must be followed by a written approval within five days to be valid.	Thank you for your comment. The ability to receive verbal approval only is absolutely vital in cases of natural or anthropogenic events. We have received numerous complaints from PIs who did not even have access to a computer during the natural event, but wanted NSF to be aware that their proposal would not be able to be submitted on time. The Foundation believes that it is vital to retain such flexibility in cases of natural or anthropogenic events.
28	NSF OIG	Certifications	I.G.1	I-8	Failure to comply with SAM certification requirements prior to proposal submission will impact the processing of the proposal. Suggest specifying the impact to the processing of the proposal (e.g., processing delays, ineligible for proposal submission, etc.).	Thank you for your comment. The following language has been incorporated into I.G.2 in the revised version of the PAPPG submitted to OMB for final clearance: "Failure to comply with SAM certification and registration requirements will impact the submission and processing of the proposal. If a registration is not active, an organization will not be able to submit a proposal nor will NSF be able to take approval actions on any submitted proposals or approved awards. Additionally, payments will not be able to be processed and approved."
29	NSF OIG	Certifications	II.C.1.d	II-4	1. "Government-wide Certifications and Representations are provided by the proposer on an annual basis in SAM."; 2. "The AOR must use the "Authorized Organizational Representative function" to sign and submit the proposal, including Specific proposal certifications."; 3. "The required proposal certifications are as follows..." Several government-wide certifications were removed to implement M-18-24, including Drug-Free Workplace, Debarment and Suspension, Certification Regarding Lobbying, Certification Regarding Nondiscrimination, Certification Regarding Federal Tax Obligations, and Certification Regarding Criminal Convictions. All other certifications that must be provided via the AOR function in NSF's electronic system are still included in this section. However, the language does not make it clear that only NSF-specific proposal certifications are now listed. We suggest specifying that the included proposal certifications are only the NSF-specific proposal certification, and the government-wide certifications are in SAM.	Thank you for your comment. The revised listing of certifications that an AOR will electronically sign and submit with the proposal does contain a government-wide certification that applies only to certain types of proposals submitted to the Federal government. As such the listing is not limited to NSF-specific certifications only.
30	NSF OIG	Biographical Sketch	II.C.2.f(i)	II-13	A separate biographical sketch (limited to two pages) must be provided for each individual designated as senior personnel through use of an NSF-approved format. The language does not specify that a description of NSF-approved format(s) for biographical sketches will be posted on the NSF website. We suggest specifying in the actual language that a description of the approved format(s) will be posted on the NSF website and include the actual location of the website. And specifying that all outside affiliations, foreign and domestic, must be listed.	Thank you for your comment. Upon publication, NSF will provide a link to all NSF-approved templates for the biographical sketch and current and pending support.
31	NSF OIG	Biographical Sketch	II.C.2.f(i)(b)	II-14	A list, in reverse chronological order, of all the individual's academic/professional appointments beginning with the current appointment. Appointments include any titled academic, professional, or institutional position whether or not remuneration is received. The draft language includes amending guidance about appointments in biographical sketches to specifically state that senior personnel should include any titled academic, professional, or institutional position whether or not remuneration is received. We recommend adopting this change to ensure senior personnel are disclosing all relevant positions to NSF so that NSF can make an informed decision regarding conflicts of interest and conflicts of commitment when evaluating proposals.	Thank you for your comment regarding the inclusion of new language in the Biographical Sketch. It should be noted that NSF will not use this information to make decisions regarding conflicts of interest in accordance with NSF policy. Grantee organizations are solely responsible for determining and managing senior personnel conflicts of interest.

32	NSF OIG	Salary Compensation	II.C.2.g(i)(a)	II-15	<p>As a general policy, NSF limits the salary compensation requested in the proposal budget for senior personnel to no more than two months of their regular salary in any one year</p> <p>The purpose of this “general policy” appears to be to implement the preceding paragraph: “NSF regards research as one of the normal functions of faculty members at institutions of higher education. Compensation for time normally spent on research within the term of appointment is deemed to be included within the faculty member’s regular organizational salary.” 1.We suggest strengthening the last sentence quoted above by adding, “NSF funds are not intended to subsidize normal functions already required of faculty members and included in faculty salaries.” 2.Although NSF states its “general policy” for senior personnel compensation as a limit, awardees are allowed to exceed this limit “[u]nder normal rebudgeting authority.” We suggest that NSF should either (a) move away from the 2-month salary limit and develop a new means to implement its position that faculty members’ institutional salaries include compensation for research, or (b) enforce the limit by requiring specific NSF approval for senior personnel salaries in excess of two months per year. 3.We suggest that NSF affirmatively state that the senior personnel salary policy applies to all employees included in the senior personnel section of the proposal budget, regardless of their job classification within the institution. 4.The policy states that “no prior approval from NSF is necessary unless the rebudgeting would cause the objectives or scope of the project to change.” We suggest that NSF provide guidance to assist awardees in determining whether a proposed change would result in a change of project scope or objectives.</p>	<p>Thank you for your comment. 1. Noted. This would seem to suggest that no salary compensation would be possible for researchers working on NSF-funded projects. 2. As previously determined by the NSF Audit Follow-up Official “NSF and its awardees are partners in the research enterprise as acknowledged via the assistance award funding mechanism. By the nature of assistance awards, awardees have the responsibility to determine how best to achieve stated goals within project objective or scope. Given this need for flexibility, proposed project budgets with personnel compensation in excess of two months must be approved by NSF and included in the award notice. However, research often requires adjustments, and NSF permits post award re-budgeting of faculty compensation. NSF is aligned with federal guidelines and regulations in allowing re-budgeting of such compensation without prior Agency approval, unless it results in changes to objectives or scope.” 3. As determined during resolution of several OIG audit reports, all classifications for employees eligible to serve as senior personnel on NSF projects do not include research as a normal function for which they are compensated. As a result, it is possible that individuals listed as senior personnel may be eligible to have more than two months of salary reimbursed by NSF. Therefore, NSF has determined that it is not feasible to affirm that the applicability of the senior salary policy to all employees, regardless of their job classification”. In addition, NSF’s faculty compensation policy already permits requesting more than two months on the budget where appropriate for the research to be conducted. 4. What constitutes a change in objective or scope is dependent upon the research being conducted, and is best determined by the researcher and the organization.</p>
33	NSF OIG	Current and Pending Support	II.C.2.h	II-23	<p>The draft language includes amending the Current and Pending Support language to clarify NSF’s requirements for submission of current and pending support information.</p> <p>We recommend adopting this change to clarify the existing rules to ensure senior personnel are disclosing all current and pending support. Specifically, we recommend NSF keep the language specifying that disclosure is required regardless of whether the support is financial or in-kind, including an explicit reference to consulting support, and that there is no minimum amount of time established. Such provisions will ensure disclosures to NSF are accurate and complete so that NSF can make an informed decision when evaluating proposals.</p>	<p>I thank you for your comment. While the revised PAPPG language does not specifically mention consulting, it does require that all resources made available to an individual in support of and/or related to all of his/her research efforts must be provided for each senior personnel, regardless of whether or not such resources have monetary value. Such support must be provided irrespective of whether it is provided through the proposing organization or is provided directly to the individual.</p> <p>In-kind contributions (such as office/laboratory space, equipment, supplies, employees, students) must be reported, as well as in-kind contributions not intended for use on the project/proposal being proposed. The revised PAPPG submitted to OMB for final clearance now specifies that if the in-kind contributions are intended for use on the project being proposed to NSF, the information must</p>
34	NSF OIG	Current and Pending Support	II.C.2.h	II-23	<p>We recommend requiring updated and certified current and pending support information prior to an NSF award recommendation and with each interim/annual/final project report rather than just at the time of proposal submission.</p>	<p>Thank you for your comment. Given that this would constitute a policy change, to ensure compliance with Paperwork Reduction Act requirements, more internal and external discussion and communication is required, including posting in the Federal Register for public comment, prior to implementation.</p>
35	NSF OIG	Current and Pending Support	II.C.2.h	II-23	<p>If the project (or any part of the project) now being submitted has been funded previously by a source other than NSF, provide the required information describing the last period of funding</p> <p>We recommend NSF adopt similar language to NIH Form PHS 398/2590 Other Support, which requires explicit statements to address any potential overlap (scientific, budget, effort level) and how it would be resolved.</p>	<p>Thank you for your comment. Given that this would constitute a policy change, it would require more internal and external communication, including posting in the Federal Register for public comment, prior to implementation.</p>
36	NSF OIG	Cost Sharing	II.C.2.i	II-23-24	<p>1.“Proposers should include an aggregated description of the internal and external resources (both physical and personnel) that the organization and its collaborators will provide to the project, should it be funded.” 2.“Although these resources are not considered voluntary committed cost sharing as defined in 2 CFR § 200.99, the Foundation does expect that the resources identified in the Facilities, Equipment and Other Resources section will be provided, or made available, should the proposal be funded.”</p> <p>Coupling the mention of cost sharing with the expectation that the resources will be provided or made available implies that items mentioned in this section should not be later charged to NSF as costs of the resulting award. If it is NSF’s expectation that resources listed in this section are to be made available to the award without additional cost to NSF, then NSF should make this clear. If that is not NSF’s intent, we suggest NSF direct proposers state that NSF funds are requested for these resources and include a reference to where in the proposal budget charges for the resources are included.</p>	<p>Thank you for your comment. This comment does not address that there is an important distinction between voluntary committed and voluntary uncommitted cost sharing. The Foundation believes that the existing language is clear and accurate and fully compliant with 2 CFR § 200.</p>
37	NSF OIG	Award Conditions	VI.C	VI-2	<p>When these conditions reference a particular PAPPG section, that section becomes part of the award requirements through incorporation by reference.</p> <p>Please see our suggestions outlined in comment number 23.</p>	<p>Thank you for your comment. In large part, the PAPPG provides guidance and explanatory material to proposers and awardees. Therefore, it would be inappropriate to impose on NSF awardee organizations the requirement to comply with all such guidance and explanatory material as terms and conditions of an NSF award. NSF strongly believes that the articles specified in the General Conditions clearly articulate the parts of the PAPPG that are indeed requirements imposed on an awardee, and, for which they will be held responsible.</p>

38	NSF OIG	Change of Scope	VII.B.1.q	VII-2	<p>1. "The objectives or scope of the project may not be changed without prior NSF approval." 2. "Prior written NSF approval also is required for changes to the Facilities, Equipment and Other Resources section of the approved proposal that would constitute changes in objectives or scope."</p> <p>We suggest defining change of scope and/or providing a list of circumstances that could be considered a change of scope. Guidance that is more clearly defined will help researchers, administrators, and other stakeholders better understand what circumstances would constitute a change in scope.</p>	Thank you for your comment. What constitutes a change in objective or scope is dependent upon the research being conducted, and is best determined by the PI and any co-PIs and the awardee organization.
39	NSF OIG	Significant Changes in Methods or Procedures	VII.B.1.b	VII-2	<p>Significant changes in methods or procedures should be reported to appropriate grantee official(s). The PI/PD also must notify NSF via use of NSF's electronic systems.</p> <p>We suggest defining the word "significant" within the context of this guidance and/or provide examples as to what represents a "significant" change in methods or procedures. Guidance that is more clearly defined will help researchers, administrators, and other stakeholders better understand what circumstances should be reported to NSF and other appropriate grantee officials.</p>	Thank you for your comment. What constitutes a significant change in methods or procedures is dependent upon the research being conducted, and is best determined by the PI and any co-PIs and the awardee organization.
40	NSF OIG	Cost Sharing	VII.C	VII-6-7	<p>Failure to provide the level of cost sharing required by the NSF solicitation and reflected in the NSF award budget may result in termination of the NSF award, disallowance of award costs and/or refund of award funds to NSF by the grantee.</p> <p>NSF should expand this guidance to explain what happens in cases where NSF rejects all or a portion of a recipient's claimed cost share. The current policy covers what a recipient needs to do should it become aware that it is unable to provide the amount of cost share included in the proposal budget, but does not detail potential outcomes of claimed cost share being rejected by NSF. For example, an audit may question all or a portion of the recipient's cost share and NSF may sustain the audit findings. If this causes the recipient to fall short of its mandatory cost share requirement, then the recipient is not in compliance with award terms and conditions and should not receive the full amount of NSF approved funds. This section should include procedures for computing the allowable Federal share of total project costs in cases where the full amount of mandatory cost share is not provided in the form of allowable project costs, funded by non-Federal sources.</p>	Thank you for your comment. NSF does not believe the level of detail recommended is warranted given the limited number of NSF programs which include a mandated cost sharing requirement. At present, the number of programs that mandate cost sharing is six.
41	NSF OIG	Definitions	IX.B.3	IX-4	<p>Allegations of research misconduct are taken seriously and are investigated by NSF's Office of the Inspector General (OIG).</p> <p>Remove the word "the" from "Office of the Inspector General"; the name is "Office of Inspector General".</p>	Thank you for your comment. This comment has been incorporated into the revised PAPPG submitted to OMB for final clearance.
42	NSF OIG	Definitions	XII.C.3	XII-6	<p>Possible misconduct in activities funded by NSF should be reported to the Office of the Inspector General, National Science Foundation, 2415 Eisenhower Avenue, Alexandria, VA 22314, (703) 292-7100 or (800) 428-2189 or via e-mail at: oig@nsf.gov.</p> <p>1. We recommend including the website, https://www.nsf.gov/oig/report-fraud/, in addition to phone number and email in this section, since some individuals may feel more comfortable submitting a complaint anonymously through a web form than in an email or over the phone. 2. Remove the word "the" from "Office of the Inspector General"; the name is "Office of Inspector General".</p>	Thank you for your comment. These changes have been incorporated into the revised version of the PAPPG submitted to OMB for final clearance.
43	University of Kansas	Certifications	II.C.1.d	II-4	<p>The AOR is required to certify the "accuracy and completeness of statements contained in the proposal." For the additional data being requested on Current and Pending Support, the AOR may not have any institutional resources available to provide this level of assurance for data, which must be obtained from investigators on their outside commitments, and cannot be independently verified by the institution. This type of data's completeness and accuracy rests with the individual investigator. To this end, we ask that SF explicitly acknowledge that an AOR's certification of a proposal includes dependence on investigator-provided data.</p>	Thank you for your comment. Upon submission, the proposing organization certifies to the overall accuracy of the proposal. Organizations need to utilize whatever internal lines of communication they believe are necessary in order to provide the required Current and Pending Support information outlined in the revised PAPPG.

44	University of Kansas	Current and Pending Support	II.C.2.h	II-23	<p>(1) The scope of information to be included for each investigator has been broadened quite significantly. The new wording can be interpreted to require reporting of time commitments outside the investigator's institutional appointment. We would ask for this language to be clarified to indicate that only time commitments related to their institutional appointments are required. (2) We also request that NSF clarify expectations on reporting and calculation of the total award value and dates for the provided examples of in-kind support ("office/laboratory space, equipment, supplies, employees, students"). We support COGR's suggestion that Current and Pending Support is not an optimal mechanism if NSF needs this information to be reported.</p>	<p>Thank you for your comment. (1) As noted in the draft Federal Register version of NSF 20-1, NSF does not consider the clarifications to Chapter II.C.2.h to be changes in policy. For decades, use of the term "all" was intended to encompass all current and pending support, whether provided through the organization, or directly to the individual. For over five decades, the PAPPG has consistently required that investigators report all current and pending support from all sources and this information should be included in each proposal submitted to NSF. The Foundation uses the information submitted in the Current and Pending Support section to assess the capacity of investigators to carry out the research as proposed and to help assess any potential overlap with the project being proposed. Reporting solely on institutional responsibilities would not provide a complete and accurate picture of a researcher's capacity and commitments. This is the rationale for why NSF has historically required that all current and pending support from all sources be provided and why it continues to be the case moving forward.</p> <p>(2) NSF has addressed the concerns noted in (2) by revising the format submitted to OMB for final clearance to provide additional clarity regarding in-kind support.</p>
45	MIT	Current and Pending Support	II.C.2.h	II-23	<p>Our current understanding of the Current and Pending support has not included activities outside their institute appointment, such as consulting work. Our interpretation has been NSF collects this information to establish whether a researcher is over-committed with their institute effort, which would not pertain to outside activities. We also have concerns with reporting in-kind support (that has a time commitment) as this information is not usually quantified and we are not sure how we would report this in the current format for Current and Pending support. We have not been reporting outside activities or in-kind support in the past and have not received any pushback from NSF on this. If NSF proceeds with requiring this additional information, we are concerned with the burden of entering this in Fastlane or Research.gov for faculty and staff.</p>	<p>Thank you for your comment. As noted in the draft Federal Register version of NSF 20-1, NSF does not consider the clarifications to Chapter II.C.2.h to be changes in policy. Use of the term "all" was intended to encompass all current and pending support, whether provided through the organization, or directly to the individual. The PAPPG has consistently required over a number of decades that investigators report all current and pending support from all sources and this information should be included in each proposal submitted to NSF. The Foundation uses the information submitted in the Current and Pending Support section to assess the capacity of investigators to carry out the research as proposed and to help assess any potential overlap with the project being proposed. Reporting solely on institutional responsibilities would not provide a complete and accurate picture of a researcher's commitments. This is the rationale for why NSF has historically required that all current and pending support from all sources be provided and why it continues to be the case moving forward.</p>
46	MIT	Current and Pending Support	II.C.2.h	II-23	<p>We would also like clarification on the following regarding Current and Pending Support:</p> <p>(1) Whether institutional start-up funding/packages for PI's (which does not have a time commitment), need to be reported. Our current interpretation is no.</p> <p>(2) Can NSF confirm that this does not include faculty academic year salary? Our current interpretation is no.</p> <p>(3) If faculty have part-time appointments (visiting or other) at 2 universities, does NSF expect C&P associated with both appointments to be disclosed in any single application? This can come up with faculty are transferring institutions</p> <p>(4) When will the new electronic format be available for view since we will no longer be able to upload a PDF? This will require additional training and education for faculty and staff on using the new format.</p>	<p>Thank you for your comments. (1) NSF intends to develop a set of Frequently Asked Questions (FAQs) to accompany the revised PAPPG, when implemented. These FAQs will specifically state that institutional startup packages from the proposing organization are not required to be reported. (2) Faculty academic year salary is not considered current and pending support in this context. (3) It is expected that a faculty member will identify all of their current and pending support irrespective of whether or not they have multiple appointments. (4) Upon publication, NSF will provide a link to a webpage that specifies all NSF-approved templates for use in preparation of both the biographical sketch and current and pending support. With the creation of an NSF approved format for both the Biographical Sketch and Current and Pending support in partnership with NIH's SciENcv system, investigators will have one central place to enter and update their biographical and current and pending support information and generate an NSF-approved document for submission with a proposal. This centralized system eliminates the need to enter this data into FastLane for each proposal submission.</p>
47	University of Wisconsin-Madison	Participant Support	II.C.2.g(v)	II-18	<p>Thank you for clarifying that costs associated with an NSF-sponsored conference (e.g., rental fees, catering costs, supplies, etc.) should be included in the "Other Direct Costs" category. That should help alleviate confusion about where these costs should be budgeted and if they are subject to F&A.</p> <p>We would recommend omitting the wording "secured through a service agreement/contract" in the sentence, "Costs related to an NSF-sponsored conference (e.g., venue rental fees, catering costs, supplies, etc.) that will be secured through a service agreement/contract should be budgeted on line G.6., "Other Direct Costs" to ensure appropriate allocation of indirect costs." Neither institutional purchasing policies nor the Uniform Guidance require that these types of purchases be made solely through service agreements or contracts. A purchase of a small dollar amount may be made through some other mechanism, but the PAPPG wording suggests that a service agreement or contract is the only suitable mechanism for making such purchases. We believe that is not the case and that the language should not suggest as such.</p>	<p>Thank you for your comment. NSF does not concur with the interpretation identified in this recommendation, and, as such no change has been made.</p>
48	University of Wisconsin-Madison	Publication/ Documentation/ Dissemination	II.C.2.g(vi)(b)	II-19	<p>We believe that data deposit and curation costs would fall into the category of "sharing of research results" and therefore be allowable if incurred after the end of the period of performance but before closeout, consistent with 200.461. Please confirm.</p>	<p>Thank you for your comment. NSF concurs with your interpretation.</p>

49	University of Wisconsin-Madison	Current and Pending Support	II.C.2.h	II-23	<p>NSF-approved format</p> <p>NSF indicates that Current and Pending Support documents must be provided through use of an NSF-approved format. We are curious to know what this format will look like. UW-Madison has created an internal, electronic tool (that pulls information from data sources on our campus) to enable PIs and their administrators to create Current and Pending/Other Support documents for multiple sponsors, including NSF. Given that our PIs and administrators are accustomed to this tool, we hope that moving to an NSF-approved format will not create additional administrative burden for our institution.</p>	Thank you for your comment. Upon publication, NSF will provide a link to a webpage that specifies all NSF-approved templates for use in preparation of both the biographical sketch and current and pending support. With the creation of an NSF approved format for both the Biographical Sketch and Current and Pending support in partnership with NIH's SciENcv system, investigators will have one central place to enter and update their biographical and current and pending support information and generate an NSF-approved document for submission with a proposal. This centralized system eliminates the need to enter this data into FastLane for each proposal submission.
50	University of Wisconsin-Madison	Current and Pending Support	II.C.2.h	II-23	<p>Consulting</p> <p>Information on current and pending support has historically included activities in which an individual engages as part of their institutional appointment. For this appointment, an individual is compensated with an institutional base salary (IBS). 2 CFR 200.430 states that "IBS excludes any income that an individual earns outside of the duties performed for the IHE." Our institution considers outside consulting agreements to be made with the investigator as an individual, separate from and outside of the individual's university appointment. Consulting agreements are not negotiated, reviewed, or signed by UW-Madison. As such, the inclusion of consulting in the list of potential sources of Current and Pending Support will cause confusion for our investigators, who are unused to including anything on Current and Pending Support that is outside of their work on behalf of UW-Madison. The inclusion of consulting will create significant burden and necessitate that both investigators and administrators adjust to new requirements.</p> <p>Outside Activity Report information is maintained in a system separate from information used at UW - Madison to prepare Current and Pending support documents. The two systems are distinct from one another and managed by different offices. A new infrastructure would need to be created to ensure that relevant consulting arrangements are reported on Current and Pending Support documents. This will create substantial administrative burden and costs for our university.</p>	Thank you for your comment. NSF has carefully considered comments submitted regarding consulting arrangements. The revised PAPPG submitted to OMB for final clearance has removed the term "consulting" from the list of examples of "current and pending support." The revised language, however, does require that all resources made available to an individual in support of and/or related to all of his/her research efforts must be provided for each senior personnel, irrespective of whether such support is provided through the proposing organization or is provided directly to the individual.
51	University of Wisconsin-Madison	Current and Pending Support	II.C.2.h	II-23	<p>Consulting (Cont'd)</p> <p>Also, the time component of consulting activities is reported quite differently from projects listed in Current and Pending Support. Projects listed in a Current and Pending Support document typically list the total award period covered, as well as the number of person months committed to the project. In UW-Madison's Outside Activities Reporting system, time spent on an activity is reported on a calendar year basis, not in terms of a start and end date. For a given calendar year, individuals are asked to report a range of days that they spent on the activity (Fewer than 10 days; 10 to 50 days; more than 50 days). This reporting is unlike what is expected in Current and Pending Support and would not be easily translatable to person-months.</p> <p>Finally, if an individual engages in outside consulting, certain (not all) consulting arrangements must be reported to UW-Madison as part of our Outside Activities Reporting process and reviewed by our institutional conflict of interest committee. Outside Activity Reports include information about compensation received, ownership interest, leadership positions, and travel (for investigators with PHS-funded research). Because these are activities in which individuals engage outside of one's university appointment, inclusion of these activities might well result in an individual reporting person-months in excess of 12 months. Should that be the case, does NSF anticipate creating a standard for an acceptable threshold of time that can be devoted to outside activities? Large universities handle consulting activities somewhat differently, but it would be highly unusual for a federal agency to make determinations about faculty activities separate from sponsored programs.</p>	Thank you for your comment. NSF does not have plans to develop a threshold for disclosing effort on outside activities. The information collected under Current and Pending Support is not intended to serve in any way as a formal accounting of time to be contributed. Nor does it replace existing postaward mechanisms to report changes in person months contributed to the project. Rather, current and pending support is used to assess the capacity of an individual to carry out the work, as proposed, as well as to help avoid the funding of duplicative research funded elsewhere. Further, awardees are responsible for developing, maintaining, and enforcing internal controls over outside activities and compensation of faculty. NSF audits and reviews may examine effort contributed to NSF awards, and if such examinations identify a significant decrease in effort has occurred under a given NSF award, reviewers would rightfully question whether a change in scope/objectives has occurred and whether NSF was notified. Thus, NSF expects that recipients will formally notify the Agency (via Notifications and Requests in Research.gov) of anticipated or known significant reduction to effort, in accordance with the grant conditions, under its awards.
52	University of Wisconsin-Madison	Current and Pending Support	II.C.2.h	II-23	<p>Internal funds allocated toward specific projects</p> <p>Another example of support to be included in Current and Pending is internal funds allocated toward specific projects. UW-Madison has internal funds that are allocated toward specific projects, but that do not require a specific time commitment. Instead of reporting on time spent, investigators with these funds are expected to report on research results. Because there is no specific time commitment expected, there is not one proposed or reported. Would NSF be comfortable with zero person-months listed for these types of projects? Or, since there is no time commitment, should we simply exclude these projects?</p>	Thank you for your comment. If the project or proposal does NOT specify a time commitment, and establishes no other obligations for receipt of compensation, it would be considered a gift and does not need to be reported. NSF intends to develop a set of Frequently Asked Questions (FAQs) to accompany the PAPPG, when implemented. These FAQs will specifically address this issue.
53	University of Wisconsin-Madison	Current and Pending Support	II.C.2.h	II-23	<p>In-kind support</p> <p>The proposed language includes in-kind support. If the support being provided is in-kind, it may very well not have a specific time commitment associated with it. Would NSF be comfortable if this type of support were listed with zero person-months included? Additionally, provision of in-kind support information in Current and Pending Support is confusing vis-à-vis the requirement to describe Facilities, Equipment, and Other Resources to be provided to the project. How will institutions determine which resources should be listed in Current and Pending Support versus Facilities, Equipment, and Other Resources?</p>	Thank you for your comment. If the project or proposal does NOT specify a time commitment, and establishes no other obligations for receipt of compensation, it would be considered a gift and does not need to be reported. However, if there are any associated obligations required for receipt of such funding, the support would need to be reported as the obligation would imply some commitment of time.
54	University of Wisconsin-Madison	Conference Proposals	II.E.7	II-42	<p>Part g. Meals and Coffee Breaks, fourth sentence makes reference to 2 CFR §200.474(b)(3). There does not appear to be a subpart (b)(3) in 200.474. Should this refer to subpart (b)(2)?</p>	Thank you for your comment. The reference cited in the PAPPG has been updated with the correct reference of 2 CFR §200.474(d).

55	FASEB	Current and Pending Support	II.C.2.h	II-23	Given growing concerns about the non-reporting of foreign sources of grant funding, FASEB also supports the clarification of NSF's longstanding requirement for applicants to disclose current and pending support. Coupled with Dr. Cordova's recent Dear Colleague Letter, this shows a strong commitment to proper stewardship of federal funds. Similarly, we also applaud the expanded background on Responsible and Ethical Conduct of Research (RCR), particularly highlighting the role of institutions as stewards of research ethics and citing the three recent National Academies of Sciences, Engineering, and Medicine (NASEM) reports ^{1,2,3} related to appropriate professional and scientific conduct.	Thank you for your comment. NSF's policy is that all resources made available to an individual in support of and/or related to all of his/her research efforts must be provided for each senior personnel, regardless of whether or not such resources have monetary value. Such support must be provided irrespective of whether it is provided through the proposing organization or is provided directly to the individual.
56	FASEB	Biographical Sketch	II.C.2.f	II-13	The draft PAPPG indicates that biographical sketches must be provided for each individual designated as senior personnel through use of an NSF-approved format. An associated comment states that a description of the NSF-approved format(s) will be posted on the NSF website when the PAPPG is issued. To avoid any confusion, we encourage NSF to include in this section of the PAPPG further details about the NSF-approved format(s) and a link to the format(s) on the NSF website when the PAPPG is issued.	Thank you for your comment. Upon publication, NSF will provide a link to a webpage that specifies all NSF-approved templates for use in preparation of both the biographical sketch and current and pending support. With the creation of an NSF approved format for both the Biographical Sketch and Current and Pending support in partnership with NIH's SciENcv system, investigators will have one central place to enter and update their biographical and current and pending support information and generate an NSF-approved document for submission with a proposal. This centralized system eliminates the need to enter this data into FastLane for each proposal submission.
57	University of Chicago	Current and Pending Support	II.C.2.h	II-23	As pointed out in the COGR letter, existing Current and Pending support reporting requirements mandate that investigators report project support and proposal information from all sources, including internal funds allocated toward specific projects, provided that such activities require a portion of time of an investigator serving in a PI/PD role or as other senior/key personnel. NSF states that this requirement exists regardless of whether salary support is requested. Our understanding has been that such requirements relate to the investigator's institutional appointment and any external funds provided to the investigator for project support. Expanding this to include activities outside their institutional appointment, such as approved outside consulting or work during the summer for 9-month faculty is a significant change from current accepted practice. At the University of Chicago, any outside activities that result in personal payment, equity ownership, or a non-paid appointment with an international organization are disclosed as part of the annual conflict of interest disclosure process. Those disclosures are reviewed and analyzed for any potential conflict of interest and conflict of commitment with their University activities. If a conflict exists, it is eliminated or managed. These activities are considered outside activities and are specifically excluded from their University commitment but are managed to assure they do not conflict with their University commitment and responsibilities. This important distinction has existed for many years in policy, guidance and training on the topics of Conflict of Interest and Conflict of Commitment. These activities are disclosed and managed under the NSF Conflict of Interest requirements and requiring additional reporting in Current and Pending support is unnecessary and adding burden through a second reporting obligation. It is also important to point out that the outside activities are much different in scope as these are usually consulting type engagements that are not project based and have no fixed start and end dates, have no fixed dollar amount to report and therefore do not fit the standard reporting formats that NSF requires for Current and Pending support. We ask that NSF reconsider this requirement in view of the conflict of interest disclosure requirements that already exist and remove the requirement for reporting outside activities a second time through Current and Pending support.	Thank you for your comment. As noted in the draft Federal Register version of NSF 20-1, NSF does not consider the clarifications to Chapter II.C.2.h to be changes in policy. Use of the term "all" was intended to encompass all current and pending support, whether provided through the organization, or directly to the individual. The PAPPG has consistently required over a number of decades that investigators report all current and pending support from all sources and this information should be included in each proposal submitted to NSF. The Foundation uses the information submitted in the Current and Pending Support section to assess the capacity of investigators to carry out the research as proposed and to help assess any potential overlap with the project being proposed. Reporting solely on institutional responsibilities would not provide a complete and accurate picture of a researcher's commitments. This is the rationale for why NSF has historically required that all current and pending support from all sources be provided and why it continues to be the case moving forward.
58	University of Chicago	Current and Pending Support	II.C.2.h	II-23	We also want to emphasize our support for the COGR comments regarding new reporting formats and clear definitions of what should be reported. The COGR letter states: <i>"We ask that NSF work with COGR and FDP in developing the new electronic format mentioned in the NSF comment, with an eye toward minimizing burden. We also recommend that NSF work with COGR to make sure it is clear to the community what does and does not need to be reported. For example, based on the new language in the PAPPG, we understand that institutional start-up funding for PIs and Senior Personnel, which does not require a specific time commitment, need not be reported as Current and Pending Support."</i>	Thank you for your comment. Upon implementation, NSF will issue a set of Frequently Asked Questions that address Current and Pending Support. One of these questions will address institutional start up packages from the proposing organization. These packages will not be required to be reported.
59	University Corporation for Atmospheric Research	Current and Pending Support	II.C.2.h	II-23	The proposed revisions include the following sentence: "All projects and activities, current or proposed, that require a time commitment from the individual must be reported, even if the support received is only in-kind (such as office/laboratory space, equipment, supplies, employees, students)." The sentence is too vague to know how one would record information about a "project" and identify the time commitment to that project if one were provided office/lab space. We request that NSF provide a footnote to provide an example or further explain the intent.	Thank you for your comment. In-kind contributions (such as office/laboratory space, equipment, supplies, employees, students) must be reported, as well as in-kind contributions not intended for use on the project/proposal being proposed. If the time commitment or dollar value is not readily ascertainable, reasonable estimates should be provided. NSF has revised the PAPPG submitted to OMB for final clearance to specify that if the in-kind contributions are intended for use on the project being proposed to NSF, the information must be included as part of the Facilities, Equipment and Other Resources section of the proposal and need not be replicated in the individual's Current and Pending Support submission.
60	University of California	Biographical Sketch / Current & Pending Support	II.C.2.f II.C.2.h	II-13 II-23	UC strongly recommends that before implementing significant changes to its Current and Pending Support and Biosketch requirements, NSF consider the administrative burden of these proposed changes and work with other federal agencies to develop a common data collection methodology so that grantees can consistently collect and maintain these essential data, regardless of funding agency. Further, UC suggests the establishment of a single federal portal or clearinghouse for the submission of Current & Pending Support/Other Support and Biosketches (and indeed, any information that is applicable across agencies), so that grantees can easily upload and update their information, and federal grant-making agencies can easily access consistent, current and accurate information.	Thank you for your comment.

61	University of California	Current and Pending Support	II-C.2.h	II-23	The instructions state that all projects and activities “that require a time commitment” must be reported. However, it is unclear whether this means only those projects that require a formal quantified commitment of time (to a funding sponsor, for example); or more broadly any project that takes some portion of an individual’s professional time to complete, whether or not a formal commitment of such is made. The instructions further state that the number of person-months to be devoted to the project in question must be listed, which seems to indicate that the intent is to capture only those projects for which a formal time commitment has been made. However, some projects (including consulting arrangements, which are now included in the Current and Pending requirements) do not require a defined time commitment and are largely completed on an as-needed basis. Therefore, there is ambiguity on which projects should be reported given the lack of clarity on the definition of “time commitment”.	Thank you for your comment. All resources made available to an individual in support of and/or related to all of his/her research efforts must be provided for each senior personnel, regardless of whether or not such resources have monetary value. Such support must be provided irrespective of whether it is provided through the proposing organization or is provided directly to the individual. In response to comments submitted, NSF has revised the Current and Pending Support language submitted to OMB for final clearance to require In-kind contributions (such as office/laboratory space, equipment, supplies, employees, students) be reported as part of Facilities, Equipment and Other Resources. In-kind contributions not intended for use on the project/proposal being proposed must still be identified in Current and Pending Support. If the time commitment or dollar value is not readily ascertainable, reasonable estimates should be provided.
62	University of California	Current and Pending Support	II-C.2.h	II-23	The revised language states that all ongoing or proposed “projects” must be reported, and that “all projects or activities” must be reported. “Activities” could be interpreted to mean an individual’s duties, including those outside of the research endeavor – for example, teaching or clinical work (for which an individual most likely receives internal in-kind support, e.g., in the form of office space and support for graduate students. Must these activities then be reported? Or is NSF’s intent only to capture projects related to the individual’s research expertise?	Thank you for your comment. NSF concurs with this comment and has deleted the term “activities” from this coverage.
63	University of California	Current and Pending Support	II-C.2.h	II-23	If effort for activities conducted outside an individual’s institutional appointment must be reported, UC is concerned that such effort will now be counted against the individual’s maximum total effort (e.g., 12 months). We note that institutions (including UC) have policies and procedures in place to ensure that employees’ outside activities do not conflict with their institutional efforts or responsibilities. Therefore, NSF should clarify that such effort on outside activities will not be counted against the maximum total effort available for institutional responsibilities, including extramurally funded research projects.	Thank you for your comment. Information on faculty project and proposal reported in Current and Pending Support is used by NSF program officials to assess the capacity of the individual to carry out the project as proposed as well as to avoid funding of overlapping/duplicative research. Thus, Current and Pending Support is not used by NSF officials to hold proposers accountable to the two-month salary limitation for faculty and proposing entities are responsible for ensuring compliance with the faculty salary limit.
64	University of California	Current and Pending Support	II-C.2.h	II-23	The requirement to report “in-kind support” such as office/laboratory space, employees, students, and equipment does not fit within the Current and Pending Support data elements. For this kind of support, there are typically no start and end dates, project titles, person-month commitments, or quantifiable “award” amounts. Information regarding this kind of support is typically provided elsewhere in a proposal – for example, in the Facilities, Equipment and Other Resources section. Therefore, UC believes it is unnecessary and inappropriate to include this information in Current and Pending Support, unless such support is provided by a third party via a grant or contract for a specific scope of work.	Thank you for your comment. NSF concurs with your comment and has revised the Current and Pending Support submitted to OMB for final clearance to require a limited set of information relevant to in-kind support. Individuals also are directed to include, when applicable, relevant information in the Facilities, Equipment and Other Support section of the proposal in lieu of Current and Pending Support.
65	University of California	Current and Pending Support	II-C.2.h	II-23	While UC appreciates the intent of including support provided directly to the individual on the Current and Pending Support form (including, for example, approved outside professional activities such as consulting), it would be difficult for the institution to guarantee that such information provided by the individual is complete and accurate. Often the institution does not have records of all such projects – only those that are required to be reported by the individual (usually above a certain threshold). Even if the individual did not intentionally omit such a project, it is of course possible for errors and omissions to occur, particularly when individuals are engaged in many concurrent activities, both at the institution and on a personal level. While UC does have robust conflict of interest/commitment procedures that are helpful in evaluating specific situations elevated for review, we are concerned that the revised Current and Pending policies may place UC in the position of essentially policing private (and frequently confidential) agreements between an employee and a third party outside of the scope of their employment.	Thank you for your comment. Generally, NSF makes awards to an organization, not to an individual. In accepting federal funds under a grant, awardees assume legal and financial responsibility and accountability both for the awarded funds and the performance of the grant-supported activity. As such, awardees are responsible for all information and data provided to the federal agency under the grant agreement, and may need to confirm the accuracy and completeness of the information that its employees provide to the AOR in order to appropriately comply with NSF’s policies on reporting current and pending support. NSF does not dictate the terms of or interfere with the employment relationship between the awardee institution and its employees.
66	University of California	Current and Pending Support	II-C.2.h	II-23	UC is concerned that NSF may hold the institution accountable for omissions and errors (whether deliberate or not) by individuals on their Current and Pending Support information, even in those cases where there could be no reasonable expectation for the institution to be aware of such omitted or incorrect information. It is also not clear how much due diligence NSF expects from the institution in its review of Current and Pending support, especially with regard to projects not processed by the institution. The PAPPG states (II.C.1.d) that the institutional Authorized Organizational Representative (AOR) certifies the correctness of the information contained in the proposal. However, under the new Current and Pending Support instructions, this information may include data (external consulting agreements, for example) that the AOR may not be able to verify independently. Therefore, UC believes that responsibility for the completeness and accuracy of the information in the Current and Pending Support should lie with the investigator, not the institution. Institutional responsibility should be limited to ensuring that investigators are fully aware of and understand the requirements.	Thank you for your comment. Generally, NSF makes awards to an organization, not to an individual. In accepting federal funds under a grant, awardees assume legal and financial responsibility and accountability both for the awarded funds and the performance of the grant-supported activity. As such, awardees are responsible for all information and data provided to the federal agency under the grant agreement, and may need to confirm the accuracy and completeness of the information that its employees provide to the AOR in order to appropriately comply with NSF’s policies on reporting current and pending support. NSF does not dictate the terms of or interfere with the employment relationship between the awardee organization and its employees.
67	University of California	Biographical Sketch	II.C.2.f.(i)(b)	II-13	While UC also appreciates NSF’s intent to collect complete information regarding an individual’s appointments on the Biosketch form, we have similar concerns on the revised language in the draft PAPPG (I.II.C.2f(i)(b)) as those discussed above for Current and Pending Support. The PAPPG now states that all “titled academic, professional, or institutional” appointments, whether paid or not, should be included in the Appointments section of the Biosketch. These could include appointments of which the individual’s institution has no knowledge, even after reasonable due diligence.	Thank you for your comment. Generally, NSF makes awards to an organization, not to an individual. In accepting federal funds under a grant, awardees assume legal and financial responsibility and accountability both for the awarded funds and the performance of the grant-supported activity. As such, awardees are responsible for all information and data provided to the federal agency under the grant agreement, and may need to confirm the accuracy and completeness of the information that its employees provide to the AOR in order to appropriately comply with NSF’s policies on reporting current and pending support. NSF does not dictate the terms of or interfere with the employment relationship between the awardee organization and its employees.

68	University of California	PAPPG Implementation	N/A	N/A	<p>If, the NSF moves forward with the PAPPG changes, we would ask that the following be considered:</p> <p>Additional time be provided beyond January 2020 for implementation, as institutional systems and procedures will likely need to be updated and investigators trained appropriately.</p> <p>To the extent possible, submission of Current and Pending Support and updated Biosketch information be required when a project is selected for funding based on its scientific merit, not at the time of proposal (comparable to the Just-in-Time process employed by the National Institutes of Health). This would reduce administrative burden, and ensure that NSF has the most current information at the time of award.</p> <p>Coordination and harmonization with other federal agencies around these modified requests for Current and Pending Support and Biosketch sections and creation of a common portal for investigators to directly submit and update their Current and Pending Support information and Biosketches.</p> <p>A clear statement from NSF that individuals (not institutions) would be held liable for omissions in the Current and Pending Support and Biosketch sections with regard to support and appointments outside of the scope of an individual's institutional employment.</p>	Thank you for your comment. Upon submission, the proposing organization certifies to the overall accuracy of the proposal. Organizations need to utilize whatever internal lines of communication they believe are necessary in order to provide the required Current and Pending Support information outlined in the revised PAPPG submitted to OMB for final clearance.
69	Pennsylvania State University	Formatting	I.B.	I-1	<p>Web link sentence: interests. "NSF Update" is available on NSF's website at:</p> <p>Just a format change to add a hard return after the "at:" so the text will not justify the sentence with the rest of the paragraph.</p>	Thank you for your comment.
70	Pennsylvania State University	Categories of Funding Opportunities	I.C.	I-3	Since the DCLs do not always generate full proposals or funding opportunities, we would recommend moving them to Section B – NSF Programs and Funding Opportunities; or including a reference in both sections.	Thank you for your comment. This comment has been incorporated into the revised PAPPG provided to OMB for final clearance.
71	Pennsylvania State University	Types of Submissions	I.D	I-3	We propose an overall change to the LOI process (for the purpose/sake of consistency), to make all LOI submissions mandatory from an AOR (not the PI).	Thank you for your comment. This has the potential to unnecessarily increase administrative burden. NSF makes a decision when the solicitation is being developed as to whether submission of the LOI by the AOR is necessary/appropriate.
72	Pennsylvania State University	Proposal Pagation Instructions	II.B.1.	II-2	We recommend adding a statement about the features in Reseach.gov. Suggested text could read like: "However, Research.gov paginates all documents consecutively, so there is no need to paginate documents when submitting through Research.gov."	Thank you for your comment. Given that the proposal submission capabilities of Research.gov is in its early stages of implementation, NSF has not incorporated specific proposal preparation language in the PAPPG at this time. Please note that while on-screen instructions in Research.gov may vary from what is stated in the PAPPG, the content requirements stay the same. The on-screen instructions in Research.gov must be followed.
73	Pennsylvania State University	Collaborators and Other Affiliations	II.C.1.e.	II-7	ADDITIONAL TEXT is needed after "The template has been developed to be fillable, however, the content and format requirements must not be altered by the user." The sentence and an additional one afterwards would ideally read: "The template has been developed to be fillable; however, the content and format requirements must not be altered by the user; e.g., do not change the column sizes or the font type. You can, however, insert rows as needed to add more names. Also, to fit long names or other information in a cell, reduce the font size so it fits in the cell."	Thank you for your comment. This comment has been incorporated into the revised PAPPG submitted to OMB for final clearance.
74	Pennsylvania State University	Title of Proposed Project	II.C.2.a	II-8	Please add clarification that the title is limited to 180 characters, per the FastLane system; and (we think) 135 characters, per the Research.gov system.	Thank you for your comment. This comment has been incorporated into the revised PAPPG submitted to OMB for final clearance.
75	Pennsylvania State University	Project Summary	II.C.2.b	II-10	<p>Each proposal must contain a summary of the proposed project not more than one page in length. The Project Summary consists of an overview, a statement on the intellectual merit of the proposed activity, and a statement on the broader impacts of the proposed activity.</p> <p>This requirement is not just one page in length, but it appears to have a character limit if entered in the text boxes in FastLane. We request that the current character limit be added to the text. Clarification for both FastLane and Research.gov would be suggested.</p> <p>When the proposal team prepares draft text, they often perform this editing phase outside of the FastLane system with a word processor such as MS Word. Once the project summary has been finalized and pasted into the text boxes, faculty are often surprised that their "1 page" Word summary doesn't fit into the defined space within FastLane. This results in many iterations as the faculty work to reduce the amount of text to fit the FastLane allotted space. Listing the character limit would eliminate this confusion.</p>	Thank you for your comment. While many years ago there was a character count on text entered in the project summary, in 2016 NSF moved to a derived page count when compliance checking this section of the proposal. The Division of Information Systems (DIS) has confirmed through testing that the system is functioning correctly and will be contacting the commenter to determine the source of the issue they are encountering.
76	Pennsylvania State University	Project Summary	II.C.2.b	II-10	Please add clarification about whether the project summary should be written in the 3rd person. We have received requests and comments from NSF Program Officers in the past few months that the summary should be in the 3rd person, but this clarification has been removed from the NSF PAPPG.	Thank you for your comment. Unless specified otherwise in a program solicitation, NSF no longer requires the Project Summary to be written in the third person. A reminder of this policy will be added to the outreach materials presented internally to NSF staff.

77	Pennsylvania State University	Project Description	II.C.2.d(i)	II-11	We appreciate this update to the project description section and realize some investigators will opt to keep the Intellectual Merit header within their text. Will the Research.gov system compliance verification check, cause an error or reject the application if a PI chooses to keep the Intellectual Merit header?	Thank you for your comment. Research.gov will not reject a proposal that includes a header for intellectual merit.
78	Pennsylvania State University	References Cited	II.C.2.e	II-13	We request clarification be added for references of large collaborative groups, i.e.. CREAM and ICE CUBE, where there are hundreds of authors and collaborators to list. Should these be listed in their entirety or are et. al's acceptable? Should a full list be loaded into supplemental documents or single documents? Jean Feldman provides clarifications around this point in many of her presentations and conferences. It would benefit the community to have her recommendations included in the PAPPG.	Thank you for your comment. While the use of <i>et al</i> is not permitted, consult with the applicable program for discipline-specific instructions.
79	Pennsylvania State University	Biographical Sketch	II.C.2.f	II-13	Please elaborate on "NSF will only accept PDFs that are generated through use of an NSF-approved format." Will both SciENcv PDF and a person's generated PDF CV be acceptable, so long as they meet the PAPPG guidelines? The recent notifications about the use of SciENcv are confusing to the research administration and faculty communities. This format, while available for use with NIH applications, is not the ONLY acceptable way to generate a PDF approved format for NIH. The current NSF text seems to indicate that ONLY PDF's from SciENcv will be accepted. Please clarify. We also have found that faculty choosing to transition to the SciENcv early cannot use this format with submissions being entered into the Research.gov portal, because a margins error is generated.	Thank you for your comment. Upon implementation of the new PAPPG, a user generated pdf will no longer be accepted. NSF will provide a link to a webpage that specifies all NSF-approved templates for use in preparation of both the biographical sketch and current and pending support. With the creation of an NSF approved format for both the Biographical Sketch and Current and Pending support in partnership with NIH's SciENcv system, investigators will have one central place to enter and update their biographical and current and pending support information and generate an NSF-approved document for submission with a proposal. This centralized system eliminates the need to enter this data into FastLane for each proposal submission.
80	Pennsylvania State University	Biographical Sketch	II.C.2.f	II-14	Education and Postdoctoral Training section For the "Location"; please include format examples...see below suggestions: Location (city, state) Location (city, foreign country)	Thank you for your comment.
81	Pennsylvania State University	Synergistic Activities	II.C.2.f(i)(d)	II-14	Current sentence reads, "Examples with multiple components are not permitted." We suggest further clarification around the types of items NOT permitted. Possible edit to sentence: "Examples with multiple components, such as committee member lists, sub bulleted highlights of honors and prizes, or a collection of grants and research awards, are not permitted."	Thank you for your comment.
82	Pennsylvania State University	Senior Personnel Salaries and Wages Policy	II.C.2.g(i)(a)	II-15	We ask that the 2-month rule be removed from the proposal budget requirements. Given that our rebudgeting authority can allow for internal approvals of increased or decreased effort/person months, we do not understand why this requirement is still part of the NSF PAPPG.	Thank you for your comment. Given that NSF's 2-month policy is applied at the budget submission stage, we believe that it is vital that this language be retained.
83	Pennsylvania State University	Salaries and Wages	II.C.2.g(i)(c)	II-16	We request a revision to how the FastLane Budget Page collects and sorts the names listed under Section A. Senior Personnel. It would be preferred to always have the PI show as the first person in Section A, with the remaining Senior Personnel falling into alphabetical order.	Thank you for your comment. NSF is expanding the proposal submission modernization component of Research.gov and as such will not be making changes of this nature in the FastLane system.
84	Pennsylvania State University	Cost Sharing	II-C.2.g(xii)	II-22	While voluntary uncommitted cost share is not auditable by NSF, if included in the Facilities and Other Resources section of a proposal, will it be REVIEWABLE by NSF and external reviewers? Our concern is that this sort of institutional contribution will still impact reviewers and applications that are selected.	Thank you for your comment. Facilities, Equipment and Other Resources is reviewable by NSF and external reviewers. This information combined with information provided in the budget is vital to understanding whether necessary resources will be or are available to carry out the project as proposed.
85	Pennsylvania State University	Current and Pending Support	II.C.2.h	II-23	We appreciate NSF's clarification on what items should be included in an investigator's current and pending list. Inclusion of some of these items has not been our common practice. Our comments are geared toward the NEW electronic format (or formats) that will be implemented to collect the current and pending information; and the fact that upload or PDF will no longer be permitted. Further examples or a FAQ to elaborate on the types of project and activities would be helpful to the investigators/researchers. If projects are support by internal funds (such as start-up packages) do these activities need to be included? We hope the new format includes text boxes for researchers to provide context on why a particular time commitment has been included. It would also be helpful for the electronic format to have a way to delineate between projects being supported by the investigator's institution vs. projects an investigator manages on their own. Inclusion of non-institutional support and activities are not "verifiable" details that an institutional AOR can confirm before submission or should be held accountable to confirm. In particular, guidance is requested for: Source of Support – can researchers list generic sources (gifts, or private consulting), or will you require the specific funding source name? Location of project - needs instructions for when an activity is outside the home institution. Person-months per year – can this be left blank if only in-kind support is received?	Thank you for your comment. All resources made available to an individual in support of and/or related to all of his/her research efforts must be provided for each senior personnel, regardless of whether or not such resources have monetary value. Such support must be provided irrespective of whether it is provided through the proposing organization or is provided directly to the individual. In-kind contributions (such as office/laboratory space, equipment, supplies, employees, students) must be reported, as well as in-kind contributions not intended for use on the project/proposal being proposed. If the time commitment or dollar value is not readily ascertainable, reasonable estimates should be provided. If the in-kind contributions are intended for use on the project being proposed to NSF, the information must be included as part of the Facilities, Equipment and Other Resources section of the proposal and need not be replicated in the individual's Current and Pending Support submission. Information regarding start-up packages will be included in an FAQ document that will issued upon implementation of the PAPPG.

86	Pennsylvania State University	Special Information and Supplementary Documentation	II.C.2.j	II-25	<p><i>Simultaneously submitted collaborative proposals and proposals that include subawards are a single unified project and should include only one supplemental combined Data Management Plan, regardless of the number of non-lead collaborative proposals or subawards included. In such collaborative proposals, the data management plan should discuss the relevant data issues in the context of the collaboration.</i></p> <p>We would propose to further clarify this sentence such as, “In such collaborative proposals, the data management plan should discuss the relevant data issues in the context of the collaboration and include a separate section that specifies how data will be shared, managed, and stored at the various sites.”</p>	Thank you for your comment. Given that this would constitute a policy change, it would require more internal and external communication, including posting in the Federal Register for public comment, prior to implementation.
87	Pennsylvania State University	Vertebrate Animals	II.D.4	II-29	Our comment is not meant to request a rewrite of this section; rather our goal is to advocate for a separate proposal section to be created within the FastLane structure which will allow adequate space to document protocols and compliance practices. Removing “the sufficient information” out of the 15-page Project Description and permitting proposal teams a “page limitless” section to document this important component is critical. Such a change would align with current proposal practices at the National Institutes of Health.	Thank you for your comment.
88	Pennsylvania State University	Human Subjects	II.D.5	II-30	Our comment is not meant to request a rewrite of this section; rather our goal is to advocate for a separate proposal section to be created within the FastLane structure which will allow adequate space to document protocols and compliance practices. Removing “sufficient information” out of the 15-page Project Description and permitting proposal teams a “page limitless” section to document this important component is critical. Such a change would align with current proposal practices at the National Institutes of Health.	Thank you for your comment.
89	University of Colorado	Proposal Certifications	II.C.1.d	II-4	While this is already iterated in COGR’s letter, we would like to emphasize that II.C.1.d. Certification for Authorized Organizational Representative (AOR) or Individual Proposer (Page II-4), regarding NSF’s inclusion of projects and activities outside of the PI’s institutional appointment is especially problematic. Our PIs are responsible for updating their institutional record at the beginning of each calendar year, and as their situations change. However, the AOR is only able to verify that the PI’s record has been through the annual review, and has no way to verify the accuracy and completeness of the institutional record on an ongoing basis. Responsibility for the completeness and accuracy of these types of data should rest with the individual investigator rather than be considered an institutional responsibility.	Thank you for your comment. Upon submission, the proposing organization certifies to the overall accuracy of the proposal. Organizations need to utilize whatever internal lines of communication they believe are necessary in order to provide the required Current and Pending Support information outlined in the revised PAPPG submitted to OMB for final clearance.
90	University of Colorado	Categories of Proposers	I.E	I-5	<p>On page I-5, it states: Categories of Proposers Except where a program solicitation establishes more restrictive eligibility criteria, organizations in the following categories may submit proposals:</p> <p>It then lists categories 1-7. However, categories 5-7 may NOT submit (unaffiliated individuals, foreign institutions, other federal agencies).</p> <p>This is an issue that has been propagated through several iterations of the PAPPG. For absolute clarity, can this be broken out into two sections, one of categories that may submit, the other of categories that may not submit?</p>	Thank you for your comment. In categories 5-7 there are specific instances identified when proposals from those organizational types may be submitted.
91	University of Colorado	Current and Pending Support	II.C.2.h	II-23	<p>Finally, the new Current and Pending Support “new electronic format...Upload of pdf will no longer be permitted”. This has us worried, and part of it may be the unknown, but the concerns are:</p> <p>Does the PI have to rebuild the current and pending with each proposal? (This is a huge burden for our Research Associates who are fully funded by soft money and thus have a lot of C&P);</p> <p>If it can be saved, does it mean that it can’t be modified for other sponsors who might have different requirements? (Again, having to rebuild each time for multiple major sponsors, is going to be a burden);</p> <p>When will we receive clarification on the new format, will it be at the time of the release of the new PAPPG? We will need time to reach out to our campus partners to help them make the conversion. Research.gov already lists SciENcv as an approved format for the upcoming change to Biosketches needing to be created through an NSF-approved generator. Can we expect to see a similar early notification about C&Ps?</p>	Thank you for your comment. Upon submission, the proposing organization certifies to the overall accuracy of the proposal. Organizations need to utilize whatever internal lines of communication they believe are necessary in order to provide the required Current and Pending Support information outlined in the revised PAPPG submitted to OMB for final clearance.

92	Individual Submitter Julia Slocomb Dluzen, Ph.D.	Certifications	II.C.1.e.	II-4	<p>The shift to using the System for Award Management (SAM) for maintaining certifications and representations is an excellent idea that should be helpful to both applicants and reviewers. The removal of the Certification Regarding a Drug-Free Workplace, the Certification Regarding Debarment and Suspension, the Certification Regarding Lobbying, the Certification Regarding Federal Tax Obligations, and the Certification Regarding Criminal Convictions seem appropriate in an attempt to reduce burden, as most of these issues are already reported and stated in other forms or phases of the submission process. However, the loss of the Certification Regarding Nondiscrimination (comment NSF3, page II-4) is concerning. There don't appear to be additional safeguards for nondiscrimination in the proposal or submission process beyond those provided by national legislation. Additionally, removing the certification also prevents discrimination protections from potential reviewers (comment NSF25, page II-48). Notably, the Pew Research Center has reported significant inequalities in representation in STEM for minorities. The NSF's own recent reports emphasize the loss of productivity and innovation caused by the existing lack of diversity in science. The NSF has been active in attempting to reduce and address such discrimination, as evidenced by its many anti-discrimination regulations and policies (most notably 45 CFR 611, 45 CFR 617, and 45 CFR 689). This is further reflected in the important language you have added to the Responsible and Ethical Conduct of Research (RCR) section (comments NSF1-2, pages IX-3-4). Therefore, the removal of this certification, which emphasizes the importance of nondiscrimination to the NSF, seems incongruent with the NSF's ethos and could very well undermine these important efforts.</p> <p>Perhaps a suitable solution would be to mandate that all funded investigators review and sign the Certification Regarding Nondiscrimination with their co-awardees as part of the RCR responsibilities section of the application process. This would promote the ideals set forth in the new wording to the RCR section without adding burden to the review process.</p>	Thank you for your comment. NSF must be in full compliance with OMB guidance regarding submission of the requisite Federal-wide certification requirements.
93	Duke University	Publication/ Documentation/ Dissemination	II.C.e.g(vi)(b)	II-19	We join COGR in appreciating the NSF's inclusion of the data deposit and data curation costs in the allowable expenses that may be requested on Line G.2. of the proposal budget. We agree that these charges, often incurred after the period of performance, are similar in nature to traditional publication costs. However, we would encourage the NSF to also consider allowing projects to charge estimates of data publication even in the event that the exact costs are unknown at the time of closeout. Otherwise these costs will result in unintentional cost sharing by the recipient institution.	Thank you for your comment.
94	Duke University	Current and Pending Support	II.C.2.h	II-23	<p>We join COGR in encouraging NSF to reconsider what the University community sees as a significant and potentially significant expansion of current reporting requirements. Specifically, we encourage the Foundation to partner with fellow federal agencies who are in the process of reviewing and clarifying reporting requirements for support available to a researcher. A harmonization of the requirements and formats would best position the agencies to gather information in a way that would provide them a value-add, rather than adding unnecessary burden to the applicants and recipient institutions. In that discussion, we feel it is imperative that NSF remain true to the spirit of what Current & Pending is trying to accomplish – identifying and managing areas of potential over-commitment and overlap of financial support. While we have appreciation for the current environment and scrutiny being placed upon federal sponsors, we feel a measured and coordinated approach would be most beneficial.</p> <p>In general, it is our opinion that information should only be requested and provided on Current & Pending documents if it directly related to the research of the faculty. Specifically, for consulting and work performed during the summer months, this information should only be expected if it directly relates to the specific research aims of the project in question or if it could create commitment issues. As NSF knows, consulting and activities performed during the summer months, which is outside of the appointment, are largely coordinated and conducted by the researchers. Therefore, the university may have limited ability to verify and provide quality assurances of data provided by the researchers. If the Foundation does proceed, we also ask for clarification and guidance on the extent of the role and expectations for the recipient institution versus the researchers.</p> <p>In addition, Duke agrees and supports COGR's comments regarding in-kind and timing of submission of Current and Pending documents.</p>	Thank you for your comment. All resources made available to an individual in support of and/or related to all of his/her research efforts must be provided for each senior personnel, regardless of whether or not such resources have monetary value. Such support must be provided irrespective of whether it is provided through the proposing organization or is provided directly to the individual. Upon submission, the proposing organization certifies to the overall accuracy of the proposal. Organizations will need to establish whatever internal lines of communication they believe are necessary in order to provide the required Current and Pending Support information outlined in the new PAPPG.

95	Council on Governmental Relations	Current and Pending Support	II.C.2.h	II-23	<p>Existing Current and Pending support reporting requirements mandate that investigators report all current and pending support for ongoing projects and proposals from all sources, including internal funds allocated toward specific projects, provided that such activities require a portion of time of an investigator serving in a PI/PD role or as other senior/key personnel. NSF states that this requirement exists regardless of whether salary support is requested. The data elements that must be furnished are project-related data commonly included in institutional systems (start/end dates, award amounts, person-months).</p> <p>The common understanding in the research community has been that such reporting requirements relate to the investigator's involvement in projects within the scope of the investigator's institutional appointment and any concomitant obligations. Expanding this to include activities outside their institutional appointment, such as approved outside consulting or work during the summer for 9-month faculty represents a significant departure from current accepted practice as well as from the way the data have been collected and used by NSF in the past. In addition, these are data that are considered both sensitive and proprietary to investigators and private companies creating potential liability for all parties involved. While NSF may not view the new language provided in this section as a change in policy, it differs dramatically from common interpretation of previous guidance and from practices that NSF has not historically questioned during the period Current and Pending Support has been required.</p> <p>Requiring institutions to include outside activities that require a time commitment, including in kind support, is also a significant departure from current practice. By definition, in-kind support does not lend itself to the data elements currently required in Current and Pending forms (i.e., start/end dates, person months, project titles) and may be difficult to value following U.G. standards §200.306(e-h). Most in-kind support that will benefit the project is currently reported in the Facilities, Equipment and Other Resources section of the proposal and is not quantified.</p> <p>And while the process will add to institutional and investigator burden, the fact that NSF and NIH requirements are not aligned will only serve to increase that burden. One step NSF could take to ease the burden would be to consider changing its practices to ask for the Current and Pending Support / Outside Professional Activities information only for those awards that may be selected for funding rather than at the time of proposal. This will 1) reduce the administrative burden for the vast majority of applicants (>75%) not selected for funding, 2) reduce the risk of revealing the sensitive information, and 3) ensure that the NSF has the most up to date information prior to issuing a new award.</p>	<p>Thank you for your comment. All resources made available to an individual in support of and/or related to all of his/her research efforts must be provided for each senior personnel, regardless of whether or not such resources have monetary value. Such support must be provided irrespective of whether it is provided through the proposing organization or is provided directly to the individual. In-kind contributions (such as office/laboratory space, equipment, supplies, employees, students) must be reported, as well as in-kind contributions not intended for use on the project/proposal being proposed. If the time commitment or dollar value is not readily ascertainable, reasonable estimates should be provided. If the in-kind contributions are intended for use on the project being proposed to NSF, the PAPPG has been revised to require such information to be included as part of the Facilities, Equipment and Other Resources section of the proposal and need not be replicated in the individual's Current and Pending Support submission. Upon submission of the proposal, the proposing organization certifies to the overall accuracy of the proposal. Organizations will need to establish whatever internal lines of communication they believe are necessary in order to provide the required Current and Pending Support information outlined in the new PAPPG submitted to OMB for final clearance.</p>
96	Council on Governmental Relations	Certifications	II.C.1.d	II-4	<p>As discussed above, NSF is proposing to significantly expand the data that needs to be provided to include projects and activities outside of the sphere of an investigator's institutional appointment. This would be problematic for the AOR, who would now be asked to certify data that are not likely to be contained in institutional systems nor necessarily collected for reasons other than the submission of the proposal in question. In these circumstances, the institution is not in a position to independently verify the accuracy or completeness of the data in question.</p> <p>We recommend that NSF explicitly acknowledge these new circumstances by recognizing that an AOR's certification of a proposal may include reliance solely upon data that they have obtained from their investigators as part of its internal proposal preparation processes. Responsibility for the completeness and accuracy of these types of data should rest with the individual investigator rather than be considered an institutional responsibility. The institution should remain responsible for ensuring that its investigators properly understand the requirements and what needs to be included in the reporting, and for holding investigators accountable for the accuracy and completeness of the content.</p>	<p>Thank you for your comment. Upon submission, the proposing organization certifies to the overall accuracy of the proposal. Organizations will need to establish whatever internal lines of communication they believe are necessary in order to provide the required Current and Pending Support information provided to OMB for final clearance.</p>
97	Council on Governmental Relations	Publication/ Documentation/ Dissemination	II.C.2.g(vi)(b)	II-19	<p>We very much appreciate NSF's inclusion of data deposit and data curation costs in the allowable expenses that may be requested on Line G.2. of the proposal budget. One challenge we face is that like traditional publication costs, data-related publication costs may need to be incurred after the project's period of performance. Since NSF has listed data costs with publication costs, it is our understanding that these costs may now be treated the same as publication costs and therefore these costs may be charged to the award before closeout if they are not incurred during the period of performance.</p>	<p>Thank you for your comment.</p>
98	Council on Governmental Relations	Certifications	II.C.1.d	II-4	<p>Thank you for simplifying the proposal certifications at the institutional level rather than on a grant by grant basis. We appreciate the spirit of this change to move away from duplicative certifications.</p>	<p>Thank you for your comment.</p>
99	Council on Governmental Relations	Project Description	II.C.2.d(1)	II-11	<p>We appreciate that the NSF has eliminated the need to add a specific section titled Intellectual Merit, as this information is already included in the proposal in other areas.</p>	<p>Thank you for your comment.</p>
100	Council on Governmental Relations	Human Subjects	XI.B.1.a	XI-5	<p>We appreciate that NSF added the following the statement to the PAPPG: "NSF can accept a determination from an IRB that stipulates that no work with human subjects, including recruitment, may be conducted until full IRB approval is obtained".</p>	<p>Thank you for your comment.</p>

101	Council on Governmental Relations	Current and Pending Support	II.C.2.h	II-23	With respect to Current and Pending Support, we urge NSF to consider the consequential impact to institutions this change in practice will create and work with the community to minimize the additional burden. We think it would be very helpful if NSF would consider hosting a stakeholder meeting to help provide more clarity to the community on what does and does not need to be reported and why, and perhaps explore alternative approaches. It would also be tremendously helpful, and would likely make it easier to comply, if NSF and NIH would work together to better harmonize their requirements. The increase of burden to report outside professional activities, the sensitivity of the information to be reported, and the enormous and likely unfunded cost to build and/or re-engineer information technology systems, and train faculty and staff will take far more time to implement than January 2020.	Thank you for your comment. Upon submission, the proposing organization certifies to the overall accuracy of the proposal. Organizations will need to establish whatever internal lines of communication they believe are necessary in order to provide the required Current and Pending Support information provided to OMB for final clearance.
102	University of Arizona	Participant Support	II.C.2.g(v)	II-18	We appreciate the additional clarifications in the following sections. The information in these items is very useful to sponsored projects officers and departmental research administrators assisting faculty with proposal preparation. Participant Support (page II-18), language clarifying expectations for budgeting NSF-Sponsored conferences Throughout the document, reinforcement of what does/does not meet the definition of participant support	Thank you for your comment.
103	University of Arizona	Conference Proposals	II.E.7	II-42	We appreciate the additional clarifications in the following sections. The information in these items is very useful to sponsored projects officers and departmental research administrators assisting faculty with proposal preparation. Conference Proposals (page II-42) Conference proposal language on service agreements/contracts	Thank you for your comment. Upon submission, the proposing organization certifies to the overall accuracy of the proposal. Organizations will need to establish whatever internal lines of communication they believe are necessary in order to provide the required Current and Pending Support information outlined in the revised PAPPG submitted to OMB for final clearance.
104	University of Arizona	Certifications	II.C.1.d	II-4	The proposed PAPPG guide revisions include data on faculty activities outside of their institutional commitments that are not tracked by our internal systems. We are not able to certify accuracy or completeness of data that exists outside of our systems. Individual investigators are better placed to certify this information.	Thank you for your comment. Upon submission, the proposing organization certifies to the overall accuracy of the proposal. Organizations will need to establish whatever internal lines of communication they believe are necessary in order to provide the required C&PS information outlined in the new PAPPG.
105	University of Arizona	Current and Pending Support	II.C.2.h	II-23	These activities are not captured in internal systems, and are not relevant to effort reporting requirements. The expanded reporting requirements are not compatible with current application forms. We hope that a method for reporting these items will take this into account. Information on activities outside a researcher's institutional commitments is often considered confidential. We would like to be reassured that access to this information be limited, and more clarity on how and when it will be used, and how The referenced new electronic format will be leveraged.	Thank you for your comment. Upon submission, the proposing organization certifies to the overall accuracy of the proposal. Organizations will need to establish whatever internal lines of communication they believe are necessary in order to provide the required Current and Pending Support information outlined in the revised PAPPG submitted to OMB for final clearance.