

Number	Comment Source	Topic	PAPPG Reference	PAPPG Page Numbers	Comment	NSF Response/Resolution
1	University of Maryland Division of Research	Human Subjects Research	Chapter II.D.5	II-30-31	<p>The current requirement to have IRB Approval in place before a proposal can be recommended for funding is creating administrative burden for investigators and IRB Offices. In many cases, all human subject research components have not been created at the time of award consideration. By requiring investigators to have an IRB approved human subject research project in place before all components have been prepared, the policy throws a wrench in the established policies and procedures that many institutions have developed and follow when reviewing and processing approval for human subject research projects.</p> <p>In order to meet this policy, investigators must generate an incomplete IRB Application to submit to the IRB Office and submit Amendments later once the project is ready for implementation. This creates two review instances for the IRB Office, where one would be sufficient.</p> <p>The rationale for this requirement is unclear. (My apologies if I have missed it when reviewing the NSF Policy website.) It seems that adding a statement in the award letter that IRB Approval must be in place before any human subject research activities may take place would be less burdensome for investigators and research support offices. In our case, UMCP has checks in place through our Office of Research Administration to ensure that no award money is granted until all requisite approvals are in place.</p>	<p>In consideration of this comment, NSF in the last revision of the PAPPG (NSF 17-1), included new guidance regarding Section 45 CFR 690.118. In this context, "Incomplete" IRB submissions would seem to indicate "indefinite plans for the involvement of human subjects." If the plans were definite, the PI should be able to submit a protocol for review.</p> <p>When 45 CFR 690.118 is invoked, that is exactly the process used by NSF, adding a statement in the award letter that IRB Approval must be in place before any human subject research activities may take place would be less burdensome for investigators and research support offices.</p> <p>NSF does recognize however, that it can be challenging to address just in time issues at the end of the fiscal year. That said, NSF does not have the regulatory charge to monitor researchers to see if they have obtained the appropriate approvals. When other Federal agencies make awards to institutions, there is much more post-award monitoring of those institutions (not just in the realm of human subjects, but in many other areas). Since our charge as a Foundation is to make awards and not regulate research, we do not have the resources and FTEs devoted to monitoring human subjects research. Also, in practical terms, NSF makes awards not just to research intensive institutions, but to smaller institutions as well, that may not have as much staff in place to ensure proper monitoring of an individual award. However, we will continue to explore ways in which we can address this issue in future issuances of the PAPPG.</p>
2	Pennsylvania State University	Typographical Error	Introduction B. Forward	x	<p>The word, "referenced" in the below should be "reference":</p> <p>The PAPPG, in conjunction with the applicable standard award conditions incorporated by <b>referenced</b> in the award...</p>	Comment incorporated.
3	Pennsylvania State University	Formatting	Introduction C. Acronym List	xi	<p>The Acronyms for Co-Project Director and Co-Principal Investigator are listed as Co-PD and Co-PI in Section C. Throughout the PAPPG, the acronyms are listed as co-PD and co-PI. For consistency, we request that the lower case "co-PD" and "co-PI" references match the acronym list and be capitalized.</p>	Comment incorporated.
4	Pennsylvania State University	Categories of Funding Opportunities	Chapter I.C.4	I-2	<p>Since the DCLs do not typically generate full proposals or funding opportunities, we would recommend moving them to Section B – NSF Programs and Funding Opportunities.</p>	This is not accurate in that DCLs may be used for RAPIDS, EAGERS and other types of proposals included in the PAPPG.
5	Pennsylvania State University	Types of Submissions	Chapter I.D.1	I-3	<p>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).</p>	Thank you for your comment, however, NSF believes this approach is appropriate. We also believe this would add unnecessary burden to sponsored project offices.
6	Pennsylvania State University	Format of the Proposal	Chapter II.B.1	II-2	<p>Proposal Pagination Instructions. <i>Proposers are advised that FastLane does not automatically paginate a proposal. Each section of the proposal that is uploaded as a file <b>should</b> be individually paginated prior to being uploaded to the electronic system.</i></p> <p>We request the highlighted word "should" be updated to "must". This correction will align the PAPPG and the FastLane system and send a consistent requirement to the community and remove the ambiguous nature of the paragraph.</p> <p>NOTE: When you print out an application from FastLane, there is a statement at the bottom of the Table of Contents that says: "Proposers may select any numbering mechanism for the proposal. The entire proposal however, must be paginated."</p> <p>Our recommendation would be to update the PAPPG so it agrees with the FastLane statement.</p>	Comment incorporated.
7	Pennsylvania State University	Collaborators and Other Affiliations	Chapter II.C.1e	II-6	<p>We appreciate and support the COA template pilot that provides a consistent excel sheet template to list the information and remains sortable for NSF. However, we believe the five separate Tables are too burdensome to the senior project personnel and research administrative support offices. It would streamline the process to have one Table in which to provide all the names, with selection options (a drop down list) to delineate each potential conflict and/or relationship.</p>	The separate tables are easier for users to complete and the information is easier to use when separated by tables.
8	Pennsylvania State University	Collaborators and Other Affiliations	Chapter II.C.1e	II-7	<p><i>Under COA template Table 5: List editorial board, editor-in chief and co-editors with whom the individual interacts. An editor-in-chief must list the entire editorial board.</i></p> <ul style="list-style-type: none"> <li>• Editorial Board: List name(s) of editor-in-chief and journal in the past 24 months; and</li> <li>• Other co-Editors of journal or collections with whom the individual has directly interacted <b>with</b> in the last 24 months.</li> </ul> <p>We believe the highlighted "with" can be removed from the sentence.</p>	Comment incorporated.
9	Pennsylvania State University	Title of Proposed Project	Chapter II.C.2a(4)(a)	II-9	<p>Title of the proposed project: Please add clarification that the title is limited to 180 characters, per the FastLane system.</p>	NSF has opted to retain this instruction in NSF's electronic systems.

10	Pennsylvania State University	Awardee Organization Information	Chapter II.C.2a(4)(g)	II-10	<p><i>A small business must be organized for profit, independently owned and operated (not a subsidiary of or controlled by another firm), have no more than 500 employees, and not be dominant in its field.</i></p> <p>We believe the sentence is missing some punctuation and should read: A small business must be organized for profit, independently owned and operated (not a subsidiary of, <b>or controlled by</b>, another firm), have no more than 500 employees, and not be dominant in its field.</p>	Comment incorporated.
11	Pennsylvania State University	Project Summary	Chapter II.C.2b	II-11	<p><i>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.</i></p> <p>This requirement is not just one page in length, but appears to have a character limit. We request that the current character limit be added to the text.</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 characters limit would eliminate this confusion.</p> <p>Another alternative would be to eliminate the requirement to past into text boxes entirely and allow a 1-page uploaded document for all project summaries.</p>	The 4600 character limit has been removed in FastLane. The current standard is now 1 page.
12	Pennsylvania State University	Project Summary	Chapter II.C.2b	II-11	<p><i>The Project Summary <b>should</b> be written in the third person, informative to other persons working in the same or related fields, and, insofar as possible, understandable to a broad audience. It should not be an abstract of the proposal.</i></p> <p>We request the highlighted word "should" be updated to "must" to eliminate confusion.</p>	Noted.
13	Pennsylvania State University	References Cited	Chapter II.C.2d(vi)(e)	II-13	<p><i>Reference information is required. Each reference must include the names of all authors (in the same sequence in which they appear in the publication), the article and journal title, book title, volume number, page numbers, and year of publication. (See also Chapter II.C.2.d.(iii)(d)) If the proposer has a website address readily available, that information should be included in the citation. It is not NSF's intent, however, to place an undue burden on proposers to search for the URL of every referenced publication. Therefore, inclusion of a website address is optional. A proposal that includes reference citation(s) that do not specify a URL is not considered to be in violation of NSF proposal preparation guidelines and the proposal will still be reviewed.</i></p> <p>We request clarification be added for references of large collaborative groups, ie. CREAM and ICE CUBE. 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?</p>	For these types of large collaborations, the solicitation dictates the specific requirements.
14	Pennsylvania State University	Senior Personnel Salaries & Wages	Chapter II.C.2g(i)(a)	II-16	<p><i>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. It is the organization's responsibility to define and consistently apply the term "year". This limit includes salary compensation received from all NSF-funded grants. This effort must be documented in accordance with 2 CFR § 200, Subpart E, including 2 CFR § 200.430(i). If anticipated, any compensation for such personnel in excess of two months must be disclosed in the proposal budget, justified in the budget justification, and must be specifically approved by NSF in the award notice budget.19 Under normal rebudgeting authority, as described in Chapters VII and X, a recipient can internally approve an increase or decrease in person months devoted to the project after an award is made, even if doing so results in salary support for senior personnel exceeding the two month salary policy. No prior approval from NSF is necessary as long as that change would not cause the objectives or scope of the project to change. NSF prior approval is necessary if the objectives or scope of the project change.</i></p> <p>We ask that the 2-month rule described above 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.</p>	NSF has determined that the existing policy is appropriate.

15	Pennsylvania State University	Senior Personnel Salaries & Wages	Chapter II.C.2g(i)(c)	II-16	<p><i>The names of the PI(s), faculty, and other senior personnel and the estimated number of full-time-equivalent person-months for which NSF funding is requested, and the total amount of salaries requested per year, must be listed. For consistency with the NSF cost sharing policy, if person months will be requested for senior personnel, a corresponding salary amount must be entered on the budget. If no person months and no salary are being requested for senior personnel, they should be removed from Section A of the budget. Their name(s) will remain on the Cover Sheet and the individual(s) role on the project should be described in the Facilities, Equipment and Other Resources section of the proposal.</i></p> <p>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.</p>	Noted.
16	Pennsylvania State University	Cost Sharing	Chapter II.C.2g(xii)	II-22	<p><i>In order for NSF, and its reviewers, to assess the scope of a proposed project, all organizational resources necessary for, and available to, a project must be described in the Facilities, Equipment and Other Resources section of the proposal (see Chapter II.C.2.i for further information). While not required by NSF, awardee organizations may, at their own discretion, continue to contribute voluntary uncommitted cost sharing to NSF-sponsored projects. As noted above, however, these resources are not auditable by NSF and should not be included in the proposal budget or budget justification .</i></p> <p>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.</p>	The Facilities, Equipment and Other Resources section is a vital part of the proposal that must be reviewed. Reviewers will not be able to assess the full scope of the project without this section of the proposal.
17	Pennsylvania State University	Data Management Plan	Chapter 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>	NSF has opted to retain the language proposed for inclusion in the management plan for collaborative proposals.
18	Pennsylvania State University	Vertebrate Animals Research	Chapter II.D.4	II-29	<p>We appreciate the resource links and clarifications provided in the new PAPPG. 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 components is critical. Such a change would align with current proposal practices at the National Institutes of Health.</p>	Noted.
19	Pennsylvania State University	Human Subjects Research	Chapter II.D.5	II-30	<p>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 components is critical. Such a change would align with current proposal practices at the National Institutes of Health.</p>	Noted.
20	Pennsylvania State University	Proposal Checklist	Exhibit II-1	II-46	<p><i>The Project Summary should be written in the third person</i></p> <p>IF the highlighted word "should" is updated to "must" on page II-11, Section b. Project Summary; please update the text in the checklist.</p>	Noted.
21	Pennsylvania State University	Proposal Checklist	Exhibit II-1	II-46	<p>Request that an additional check section be added, "Project Description contains, as a separate section within the narrative, a section labeled "Intellectual Merit". This would be consistent with having a check section for the "Broader Impacts".</p>	Comment incorporated.
22	NSF Office of the Inspector General	Typographical Error	Introduction B. Forward	x	<p>We suggest removing "d" from referenced so this phrase says, "The PAPPG, in conjunction with the applicable standard award conditions incorporated by reference in the award..."</p>	Comment incorporated.
23	NSF Office of the Inspector General	General Edits	Introduction B. Forward	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 &amp; Award Policies &amp; 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>	This sentence is consistent with the overall intent of NSF. NSF distinguishes between policies and procedures and terms and conditions of the award.

24	NSF Office of the Inspector General	General Edits	Introduction B. Forward	x	<i>The PAPPG does not apply to NSF contracts.</i>  We suggest expanding this to include language that appeared in prior versions of the AAG: "The PAPPG is applicable to NSF grants and cooperative agreements, unless noted otherwise in the award instrument. This Guide does not apply to NSF contracts."	We believe that this concept is adequately covered in the first sentence of the second bullet.
25	NSF Office of the Inspector General	General Edits	Introduction E. NSF Organizations	xvii	<i>Anyone, including grant recipients, administrators, and NSF personnel, should contact the OIG (1-800-428- 2189 or oig@nsf.gov) to report instances of possible misconduct, fraud, waste, or abuse.</i>  We suggest that a note be added referencing the Whistleblower Protection Act and that a brief description be added outlining protections for reporting instances of misconduct, fraud, waste, or abuse.	We believe this is appropriately addressed in Article 43 of the NSF Grant General Conditions.
26	NSF Office of the Inspector General	Deadline Date	Chapter I.F.2	I-7	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.	NSF believes it is appropriate to provide flexibility in cases of natural or anthropogenic events.
27	NSF Office of the Inspector General	Collaborators and Other Affiliations	Chapter II.C.1e	II-6-7	Regarding collaborators and other affiliations (COA), a footnote states that the new COA template does not include disclosure of graduate advisors." 13 Note that graduate advisors are no longer required to be reported."  We suggest keeping the requirement to disclose graduate advisors. Like PhD advisors, such individuals are likely to have a close personal relationship with the individual filling out the COA template and it would be useful to know who these individuals are, just as NSF requests disclosure of PhD advisors.	Some information requested in prior versions of the PAPPG is no longer required. This is purposeful and we no longer require the individual to report this information.
28	NSF Office of the Inspector General	Budget	Chapter II.C.2g	II-15	<i>Each proposal must contain a budget for each year of support requested. The budget justification must be no more than three pages per proposal.</i>  We suggest increasing the page limit for the budget justification to five pages. This will allow for a more thorough review and understanding of the nuances of each award's budget.	Comment incorporated.
29	NSF Office of the Inspector General	Senior Personnel Salaries & Wages	Chapter II.C.2g(i)(a)	II-16	<i>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.</i>  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 editing this section to refer to the definition of senior personnel contained in Exhibit II-7. In addition, we suggest that NSF should 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. This unwritten definition was stated by several NSF officials at the Spring Grants Conference (June 2017).  4. The policy states that "no prior approval from NSF is necessary as long as that change would not 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.	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 in memoranda dated April 16, 2015, (Virginia Tech) and September 2, 2015, (Michigan State University and University of Florida) "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." 3a. Comment regarding senior personnel incorporated. 3b. 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 dependant upon the research being conducted, and is best determined by the researcher and the organization.
30	NSF Office of the Inspector General	Senior Personnel Salaries & Wages	Chapter II.C.2g(i)	II-16	<i>It is the organization's responsibility to define and consistently apply the term "year".</i>  We suggest inserting some parameters here, such as upper or lower limits (i.e., "Organizations can define a year as any 12 month period,") so it is clear the definition must be reasonable and consistent year-to-year.	Noted.
31	NSF Office of the Inspector General	Other Direct Costs	Chapter II.C.2g(vi)(f)	II-20	<i>Any other direct costs not specified in Lines G1 through G5 must be identified on Line G6. Such costs must be itemized and detailed in the budget justification</i>  We suggest adding a reference that any contingency funds relating to large facility projects should be included in this category, and that more information can be found on page 4.2.2-9 of the Large Facility Manual.	This change would be inappropriate for the PAPPG. This is already appropriately addressed in the Large Facilities Manual.

32	NSF Office of the Inspector General	Indirect Costs	Chapter II.C.2g(viii)	II-21	We suggest that the budget justification include a description of how the base for the indirect costs was calculated in the proposed budget, especially for organizations with multiple indirect cost rates. This requirement would help reviewers ensure that the proposed indirect costs were calculated correctly using the correct rates and bases.	Comment incorporated.
33	NSF Office of the Inspector General	Facilities Equipment & Other Resources	Chapter II.C.2i	II-23	<i>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.</i>  We suggest instructing applicants to distinguish which facilities, equipment, and resources are coming from which project participants so it is clear what is coming from the grantee versus subawardees versus collaborators. Facilities, and which facilities are the grantee's versus collaborator's, have been at issue in a number of OIG cases and requiring this information to be disclosed up front would increase transparency, decrease the likelihood for misrepresentations, and increase OIG's ability to pursue these cases.	Facilities, Equipment and Other Resources is directed at the project, not the organization.
34	NSF Office of the Inspector General	Dual Use Research of Concern	Chapter II.D.6	II-32-33	For increased readability, and to be consistent with how the policy is referred to in the last sentence of this section, we suggest changing "hereafter referred to as the 'Policy'" to state "hereafter referred to as the 'US Government Policy on DURC.'"	Noted.
35	NSF Office of the Inspector General	General Edits	Chapter VI.C	VI-2	<i>When these conditions reference a particular PAPPG section, that section becomes part of the award requirements through incorporation by reference.</i>  Please see our suggestions outlined in comment number 23.	This sentence is consistent with the overall intent of NSF. NSF distinguishes between policies and procedures and terms and conditions of the award.
36	NSF Office of the Inspector General	Fixed Amount Awards	Chapter VI.D.2a	VI-2	<i>Except in fixed amount awards, an NSF grant gives authority to the grantee to commit and expend funds for allowable costs (see Chapter X) in support of the project up to the grant amount specified in the award notice at any time during the grant period.</i>  We suggest removing "Except in fixed amount awards" from this sentence. As written, this sentence removes fixed amount awards from the requirement of spending funds during the grant period when this requirement should apply to all NSF grants (subject to exceptions for certain pre-award expenses).	NSF's language is consistent with the definition of fixed amount award in 2 CFR 200.45.
37	NSF Office of the Inspector General	Grant Periods	Chapter IV.D.3c(i)	VI-2	<i>Grantees are not authorized to extend an award that contains a zero balance.</i>  1. We suggest that "zero balance" be clearly defined. It is unclear if a zero balance refers to all funds being disbursed through ACM\$ or when costs incurred meet or exceed the approved funding amount.  2. We suggest that NSF affirmatively state it will reject grantee requests for no-cost extensions that appear "merely for the purpose of using the unliquidated balances."	1. An automatic check is performed by the NSF system to determine if there is a zero balance. 2. This is already addressed in the existing language.
38	NSF Office of the Inspector General	Supplemental Support	Chapter VI.E4.e	VI-5	<i>Special NSF programs such as Research Experiences for Undergraduates may provide their funding through supplements to other NSF grants. In such instances, the guidance in this section may not be applicable.</i>  For greater clarity, we suggest adding a sentence to the end of this subsection to the effect of: "For such programs, please refer to the requirements in the applicable Dear Colleague letter." Without such language, this section says what rules may not apply, but does not provide guidance as to what rules do apply in such circumstances.	Comment incorporated.
39	NSF Office of the Inspector General	Prior Approval	Chapter VII.A.2	VII-1	<i>Guidance regarding prior approval requirements is covered in Chapter X.A.3.</i>  We suggest replacing this text with the following: "Certain actions require prior approval from NSF. Guidance regarding prior approval requirements is covered in Chapter X.A.3 and the NSF column of the Research Terms and Conditions, Appendix A."  In addition to adding an explicit statement that clarifies there are some actions that require prior NSF approval, we suggest linking directly to the RTC, Appendix A matrix here, in addition to Chapter X.A.3., since Chapter X.A.3 does not include much detail and primarily just refers the reader to RTC Appendix A. This is more efficient for the reader as it cuts out one additional mouse click between them and the relevant information. It also helps to provide experienced grantees with this information where it used to be conveyed in Chapter VII and the related exhibit.	Comment incorporated.

40	NSF Office of the Inspector General	Changes in Objective or Scope	Chapter VII.B.1a	VII-2	<p>1. "The objectives or scope of the project may not be changed without prior NSF approval."</p> <p>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 adopting similar guidance to the National Institutes of Health that defines change of scope and provides potential indicators. This guidance can be found in section 8.1.2.5 of the NIH Grants Policy Statement. Alternatively, we suggest adding a list of circumstances that could be considered a change of scope. For example, significant increase/decrease in a PI's effort allocated to the project, a significant decrease in research opportunities for graduate and undergraduate students, and significant (&gt; 25%) rebudgeting of costs among budget categories, which indicates a material change in the research methodology.</p>	See response to comment 30.4.
41	NSF Office of the Inspector General	Changes in Objective or Scope	Chapter VII.B.1b	VII-2	<p>We suggest that NSF provide guidance to awardees to determine whether a proposed action is "significant" enough to warrant NSF notification. For instance, does an alteration to the number of students funded by the award constitute a significant change? Do equipment expenditures on a project that had no budgeted equipment because the awardee's existing facilities and equipment were sufficient indicate a "significant change in methods or procedures?"</p>	See response to comment 30.4.
42	NSF Office of the Inspector General	Substitute (Change) PI or co-PI	Chapter VII.B.23	VII-3	<p><i>In cases where a former employee or IPA is being reappointed as PI or co-PI to an award they were previously involved with, the grantee must submit a "Change of PI" request using the FastLane Notifications and Requests module....</i></p> <p>We suggest inserting "NSF," as follows, for clarity: "In cases where a former NSF employee or IPA is being reappointed as PI or co-PI to an award they were previously involved with, the grantee must submit a 'Change of PI' request using the FastLane Notifications and Requests module"</p>	Comment incorporated.
43	NSF Office of the Inspector General	Special Payment Grantees	Chapter VIII.C.4	VIII-4	<p>We suggest updating this address to reflect NSF's relocation (consistent with updated address for NSF Cost Analysis and Pre-Award Review Branch on page X-6 (PDF pg. 136)).</p>	Comment incorporated.
44	NSF Office of the Inspector General	Erroneous Payments	Chapter VIII.D.2	VIII-4	<p>We suggest updating this address to reflect NSF's relocation (consistent with updated address for NSF Cost Analysis and Pre-Award Review Branch on page X-6 (PDF pg. 136)).</p>	Comment incorporated.
45	NSF Office of the Inspector General	Award Financial Reporting Requirements and Final Disbursements	Chapter VIII.E.6	VIII-8	<p><i>NSF will notify grantees of any canceling appropriations on open awards in order for grantees to properly expend and draw down funds before the end of the fiscal year.</i></p> <p>We suggest highlighting the word "properly" in bold and/or italics. We also suggest adding language to the effect: "Grantees should not interpret NSF's notification of canceling appropriations as direction to draw down NSF funds for which there is no associated expenditure need. The timing and amount of advance payments must be as close as is administratively practicable to the actual disbursements by the grantee for direct program or project costs and the proportionate share of any allowable indirect costs (F&amp;A). (See Chapter VIII.C.2.a.)"</p>	Language has been added to address this issue.
46	NSF Office of the Inspector General	Accountability and Recordkeeping	Chapter IX.D.5i(ii)	IX-9	<p>We suggest updating this address to reflect NSF's relocation (consistent with updated address for NSF Cost Analysis and Pre-Award Review Branch on page X-6 (PDF pg. 136)).</p>	Comment incorporated.
47	NSF Office of the Inspector General	Pre-Award (Pre-Start Date) Costs	Chapter X.A.2b	X-9	<p>We suggest language reinforcing the policy in Chapter VI, Sec. E.2. that costs incurred under an "old grant cannot be transferred to the new grant" in the case of a renewal grant. The 90-day preaward cost allowability provision should not apply to renewal grants, even if the "old" award has been fully expended. This would constitute a transfer of a loss on the "old" grant to the "new" grant, which is unallowable under 2 CFR § 200.451.</p>	NSF treats renewal proposals as "new", therefore 90-day preaward costs are allowable.
48	NSF Office of the Inspector General	Other Direct Costs	Chapter X.B	X-3	<p>Coverage on Administrative and Clerical Costs has been deleted as it is redundant to coverage articulated in the Uniform Guidance."</p> <p>We suggest keeping in previous language on "Administrative and Clerical Salaries and Wages," to parallel the section that was kept about this topic in Chapter 2. There are a number of items in the PAPPG that set forth the same rules articulated in the Uniform Guidance. This seems like an important rule that is worth emphasizing here, even if it is also included in the Uniform Guidance. At a minimum, we suggest keeping a reference to the applicable Uniform Guidance provision here on this topic.</p>	This is clearly articulated in the Uniform Guidance without any added NSF verbiage, therefore we do not believe this redundancy is helpful.
49	NSF Office of the Inspector General	Other Direct Costs	Chapter X.B	X-3	<p>Comment box: Guidance regarding inclusion in the proposal budget has been deleted as it is redundant to coverage in the PAPPG Part I, Chapter II.</p> <p>We suggest keeping in previous language regarding the requirement to include this information in the proposal for emphasis and to ensure that the awardees know the rules if they look up the issue and are pointed this section of the PAPPG instead of Chapter 2. At a minimum, we suggest inserting a reference to the applicable subsection of Chapter II.</p>	This is clearly articulated in the Uniform Guidance without any added NSF verbiage, therefore we do not believe this redundancy is helpful.

50	NSF Office of the Inspector General	Other Direct Costs	Chapter X.C	X-4	Comment boxes: (1) Coverage on Rental or Lease of Facilities or Special Purpose Equipment has been deleted as it is redundant to coverage articulated in the Uniform Guidance.” and (2)“Coverage on Relocation Costs has been deleted as it is redundant to coverage articulated in the Uniform Guidance.”  We suggest keeping in previous language and references to applicable Uniform Guidance Provisions. There are a number of items in the PAPPG that set forth the same rules articulated in the Uniform Guidance. At a minimum, we suggest keeping a reference to the applicable Uniform Guidance provision here on this topic.	This is clearly articulated in the Uniform Guidance without any added NSF verbiage, therefore we do not believe this redundancy is helpful.
51	NSF Office of the Inspector General	Non-Discrimination Statutes and Regulations	Chapter XI.A.1b	XI-1	We suggest updating this address to reflect NSF’s relocation (consistent with updated address for NSF Cost Analysis and Pre-Award Review Branch on page X-6 (PDF pg. 136)).	Comment incorporated.
52	NSF Office of the Inspector General	Non-Discrimination Statutes and Regulations	Chapter XI.A.8b	XI-4	We suggest updating this address to reflect NSF’s relocation (consistent with updated address for NSF Cost Analysis and Pre-Award Review Branch on page X-6 (PDF pg. 136)).	Comment incorporated.
53	NSF Office of the Inspector General	Dual Use Research of Concern	Chapter XI.B.5	XI-7-8	For increased readability, and consistent with comment 49 regarding Chapter II, Section D.6, above, and how the policy is referred to in the last sentence of that section, we suggest changing “hereafter referred to as the ‘Policy’” to state “hereafter referred to as the ‘US Government Policy on DURC.’	Noted.
54	NSF Office of the Inspector General	Electronic Invention Handling	Chapter XI.D.1d	XI-10	We suggest updating this address to reflect NSF’s relocation (consistent with updated address for NSF Cost Analysis and Pre-Award Review Branch on page X-6 (PDF pg. 136)).	Comment incorporated.
55	NSF Office of the Inspector General	Informal Resolution of Grant Administration Disputes	Chapter XII.B.3	XII-3	We suggest updating this address to reflect NSF’s relocation (consistent with updated address for NSF Cost Analysis and Pre-Award Review Branch on page X-6 (PDF pg. 136)).	Comment incorporated.
56	NSF Office of the Inspector General	Reporting Possible Misconduct	Chapter XII.C.3	XII-6	We suggest updating this address to reflect NSF’s relocation (consistent with updated address for NSF Cost Analysis and Pre-Award Review Branch on page X-6 (PDF pg. 136)).	Comment incorporated.
57	National Radio Astronomy Observatory	NSF Address Information	entire document	various	I noticed that both the future and present addresses for NSF appear in the updated policy.	Comment incorporated.