

Comments submitted in response to the draft Federal Register version of NSF 19-1, *NSF Proposal & Award Policies and Procedures Guide*

| Number | PAPPG Reference | PAPPG Page Numbers | Comment   | NSF Response/Resolution   |
|--------|-----------------|--------------------|---|---|
| 1      | II.C.2.f(i)(d)  | II-15              | <p>I'm writing to comment on a proposed change that I believe has significant ramifications for the handling of broader impacts contributions.</p> <p>This change concerns the "Synergistic Activities" Section (Section D) of the biosketch, the section traditionally dedicated to broader impacts. The current PAPPG instructions for this section are:</p> <p>"A list of up to five examples that demonstrate the broader impact of the individual's professional and scholarly activities that focuses on the integration and transfer of knowledge as well as its creation."</p> <p>NSF proposes to change the instructions as follows:</p> <p>"This section is <b>limited to five separate examples</b>. <b>Multiple entries under a single example</b> are not permitted" [emphasis mine].</p> <p>Importantly, the proposed change does not elaborate on what constitutes an example. Thus, the strictest interpretation of "a single example" might well limit proposers to a stripped-down list of activities devoid of context and background to help reviewers assess the significance of their past broader impacts contributions.</p> <p>I am writing to urge NSF to continue to take a flexible stance, allowing proposers to use their discretion in describing five single examples (with context and background), or up to five categories of broader impacts/synergistic activities that may include a few representative examples in each category, so long as the overall two-page limit for biosketches is not exceeded.</p> <p>If NSF persists with the wording change as proposed, I recommend that you clarify the meaning of "a single example" and provide a set of clear samples to show what is permitted (and what is not permitted) in this section.</p> | <p>Thank you for your comment. NSF has modified the Synergistic Activities section of the Biographical Sketch based on the comments received.</p>   |
| 2      | II.C.2.f(i)(d)  | II-15              | <p>I am writing to express my concern with the proposed change to the language of the "Synergistic Activities" Section (Section D) of the biosketch included in the draft NSF Proposal and Award Policies and Procedures Guide (PAPPG) for 2019. The strictest interpretation of "a single example," as used in this text, may limit proposers to providing a stripped-down list of activities devoid of the context and background needed to help reviewers assess the significance of the proposer's past broader impacts contributions. I believe that the NSF should continue to allow proposers to use their discretion in describing five single examples (with context and background), or up to five categories of broader impacts/synergistic activities that may include a few representative examples in each category, so long as the overall two-page limit for biosketches is not exceeded. If the NSF adopts the proposed change of wording, I ask that it clarify the meaning of "a single example" and provide a set of clear samples to show what is permitted in this section.</p>   | <p>Thank you for your comment. NSF has modified the Synergistic Activities section of the Biographical Sketch based upon the comments received.</p> |

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| 3 | II.C.2.f(i)(d)  | II-15 | <p>I'm writing in response to the proposed change in the Proposal and Award Policies and Procedures Guide (PAPPG) for 2019 dealing with the "Synergistic Activities" Section (Section D) of the Biosketch. Stanford PIs often use that opportunity to describe some of their previous approaches and track record in addressing NSF's BI criterion. But the proposed change does not elaborate on what constitutes an example. Thus, the strictest interpretation of "a single example" might well limit proposers to a stripped-down list of activities devoid of context and background to help reviewers assess the significance of their past broader impacts contributions.</p> <p>I hope NSF will re-consider this change and continue to take a flexible stance, allowing proposers to use their discretion in describing five single examples (with context and background), or up to five categories of broader impacts/synergistic activities that may include a few representative examples in each category, so long as the overall two-page limit for biosketches is not exceeded. If this new wording change is instituted as proposed, I hope NSF will at minimum clarify the meaning of "a single example" and provide a set of clear samples to show what is permitted in this section.</p>   | <p>Thank you for your comment. NSF has modified the Synergistic Activities section of the Biographical Sketch based upon the comments received.</p>  |
| 4 | II.C.2.g(vi)(f) | II-21 | <p>Just one topic remains unclear to me, and that is around where to best include contractual costs in the budget. I outline below some of the new PAPPG text that prompts my confusion, and below are my questions.</p> <p>Both of the categories of G3 and G6 in this new PAPPG version use similar terminology; both use the word or a form of the word "contract":</p> <p>Line G3: Consultant Services (also referred to as Professional Service Costs) includes a reference to 2 CFR 200.459 Professional service costs and uses phrases such as "the necessity of contracting for the service" "Adequacy of the contractual agreement for the service..."</p> <p>Line G6: Other<br/>In the new G6 added bullet, as an item to include under the "Other Direct Costs" "Other" category -- that says<br/>"Contracts for the purpose of obtaining goods and services for the proposer's own use (see 2 CFR 200.330 for additional information). [CFR reference to "Subrecipient and contractor determinations": last words of that section - "use judgment in classifying each agreement as a subaward or a procurement contract.]"<br/>There's the side comment explaining the change of added bullet that says, "An additional example has been added to Line G6 coverage to specifically remind proposers that contracts should be included in this section of the budget and not under the subaward category."</p> <p>Questions:<br/>*So yes, we are not to put contracts in the subaward line, but which line is most appropriate for contracts, between G3 or G6, for something like an external evaluator's services, or a external collaborator who is not integral but still important to the research?</p> <p>*What is meant by "for the purpose of obtaining goods and services for the proposer's own use" (words used in the new bullet point under Line G6)? Would that be for a proposer's own research use?</p> | <p>Thank you for your comment. NSF believes the added language to the coverage on Line G.6. clarifies where contracts should be placed on the NSF budget. "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. Examples include:</p> <ul style="list-style-type: none"> <li>• Contracts for the purpose of obtaining goods and services for the proposer's own use (see 2 CFR § 200.330 for additional information)"</li> </ul> |
| 5 | II.C.2.f(i)(d)  | II-15 | <p>Like my colleagues at UC Berkeley, I am concerned about the proposed language changes. The term "single example" is not defined and will likely result in content not relevant to NSF or a simple list of activities devoid of context and background. If included, I suggest NSF provide examples relevant to reviewer concerns.</p> <p>I also believe the proposed wording removes the current emphasis on broader impacts, which is critical to informing the public of the important work of scientists and engineers and ensuring equal opportunities to education and work opportunities to now underrepresented communities.</p>   | <p>Thank you for your comment. NSF has modified the Synergistic Activities section of the Biographical Sketch based upon the comments received.</p>  |

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| 6 | II.C.2.f(i)(d) | II-15 | <p>I work at Stanford in the Office of Science Outreach. In my role here, I help faculty members develop science outreach ideas as a way of broadening the impact of their research.</p> <p>I'm writing in response to the proposed change in the Proposal and Award Policies and Procedures Guide (PAPPG) for 2019 dealing with the "Synergistic Activities" Section (Section D) of the Biosketch. This is section often provides faculty the opportunity to describe their experience with Broader Impact (BI) activities. I'm concerned that this change might limit their ability to describe their BI experience and reviewers' ability to judge their BI track record.</p> <p>I hope NSF will reconsider this change and continue to give PIs the space to use the section to describe the five examples with additional background and context.</p>   | Thank you for your comment. NSF has modified the Synergistic Activities section of the Biographical Sketch based on the comments received. |
| 7 | II.C.2g(v)     | II-19 | <p>(v) Participant Support (PSC) (Line F on the Proposal Budget) .... <del>Funds PSC</del> may not be <del>budgeted used</del> to cover room rental fees, catering costs, supplies, etc. related to an NSF-sponsored conference. This section of the budget also may not be used for incentive payments to research subjects. Human subject payments should be included on line G6 of the NSF budget under "Other Direct Costs," and <del>any applicable</del> indirect costs should be calculated on the payments in accordance with the organization's federally negotiated indirect cost rate</p>   | With the exception of the addition of a new acronym, the comments have been incorporated.  |
| 8 | II.E.7         | II-42 | <p>f. Consultant Services and Speaker Fees. Reasonable fees and travel allowances and per diem (or meals provided in lieu of per diem), Consultants' travel costs, including subsistence, may be included. If requested, the proposer must be able to justify that the proposed rate of pay is reasonable. Additional information on the allowability of consultant or professional service costs is available in 2 CFR § 200.459. In addition to other provisions required by the proposing organization, all contracts made under the NSF award must contain the applicable provisions identified in 2 CFR § 200, Appendix II.</p> <p>...The following provides a listing of the types of costs that <b>are not allowable for inclusion on a conference budget.</b></p> <p>(iv) Speaker Fees.</p> <p><del>o Speakers and trainers are not considered participants and should not be included in this section of the budget.</del></p> <p><del>o However, [I recommend moving this to §7.f where Consultant Services and Speaker Fees are defined -&gt; ] if the primary purpose of the individual's attendance at the conference is learning and receiving training as a participant, then the costs may be included under participant support.</del></p> <p><del>o If the primary purpose is to speak or assist with management of the conference, then such costs should be budgeted in appropriate categories other than participant support.</del></p> | Based on the significant number of comments that NSF receives, we do not believe that incorporation of this comment would be prudent.      |
| 9 | II.C.2.f(i)(d) | II-15 | <p>I am writing to express my concern with the new language proposed in the PAPPG for reporting synergistic activities in the NSF biosketch. The new language requires up to "five separate examples", however there is no clarifying information as to what qualifies as "separate" activities. If the intent is that the activities must be from completely independent projects, this may have the unintended consequence that PIs/proposers will only engage in one synergistic activity per funded proposal, because any more than that will not be recognized at NSF. I believe the goal should be to encourage researchers to engage in as many activities as they feel they are able, regardless of the funding source. If the requirement of five separate examples moves forward, NSF should at the very least define what can be considered "separate".</p>   | Thank you for your comment. NSF has modified the Synergistic Activities section of the Biographical Sketch based on the comments received. |

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| 10 | VII.B.3<br>VII.A.2 | VII-5<br>VII-1 | <p>proposed plan to maintain the safety of personnel supported by an NSF award. The Foundation may take unilateral action, as appropriate, to initiate the substitution of the PI /PD or any co-PI/co-PD on an NSF grant.</p> <p>b.When NSF invokes this authority, the grantee must nominate a substitute PI/PD or co-PI/co-PD via use of NSF's electronic systems. The substitute PI/PD's name or co-PI/co-PD's name, biographical sketch, current and pending support from all ongoing projects and proposals, must also be included in the request. The contact information for the substitute PI/PD or co-PI/co-PD also should be included. If approved by NSF, the Grants Officer will amend the grant. If not approved, or a substitute PI is not available, NSF may take steps, pursuant to Chapter VII.A to suspend or terminate the grant.</p> <p>The section it references, Chapter VII.A.2, reads as follows:</p> <p>2. Grantee Notifications to NSF<br/>The following is a listing of grantee notifications to NSF, including a reference to where additional guidance is provided. All notifications must be submitted via use of NSF's electronic systems. With the exception of significant changes in methods or procedures and significant changes, delays or events of unusual interest, all notifications must be signed and submitted by the AOR via use of NSF's electronic systems.</p> <ul style="list-style-type: none"> <li>• Grantee-Approved No-Cost Extension (i)</li> <li>• Significant Changes in Methods or Procedures (Other than Changes in Objectives or Scope)</li> <li>• Significant Changes, Delays or Events of Unusual Interest (Other than Changes in Objectives or Scope)</li> <li>• Annual and Final Cost Share Notification by Recipient</li> <li>• Conflicts of Interest that cannot be satisfactorily managed, reduced or eliminated and research that proceeds without the imposition of conditions or restrictions when a conflict of interest exists</li> </ul> <p>This has the chilling effect that, upon receipt of a routine notification such as a Grantee-Approved No-Cost Extension or Annual Cost Share Notification, NSF will be considering "the seriousness of the violation" to take unilateral action and replace a PI. This seems incongruent with the listed notifications, none of which address any kind of harassment or violations. Whereas the comment on new chapter VII.B.3 refers to Important Notice Number 144, "Harassment," I believe that New Chapter VII.B.3's reference to Chapter VII.A.2 is not an applicable reference.</p> | Thank you for your comment. NSF has modified the Synergistic Activities section of the Biographical Sketch based on the comments received. |
| 11 | II.C.2.f(i)(d)     | II-15          | <p>I have a question/concern regarding the draft biosketch guidelines included in the PAPPG for 2019. Would "<b>Multiple entries under a single example are not permitted</b>" mean that something like the bullet below (totally made up but I have done similar things in biosketches before) would not be permissible?</p> <ul style="list-style-type: none"> <li>• Education/outreach on climate change: GALS Fall Meeting (date), New Hanover Chamber of Commerce (date), NC Museum of Life and Science (date)</li> </ul>   | Thank you for your comment. NSF has modified the Synergistic Activities section of the Biographical Sketch based on the comments received. |

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| 12 | XI.A.1.g     | XI-2 | <p>demands outside of work. As an American worker, I know that I'm not required to do any of the requested things. But, when I refused, the PI often punished me at work by using abusive language, threatening violence, becoming violent, and slandering me to our colleagues. My work place is so used to her behavior that when I utilized my institutions system of reporting, little action was taken to address her behaviors. The only option I was given was to be removed from the project and limit my contact with the abusive woman. Which I did and do not regret.</p> <p>Although, I successfully stopped my harassment, a fresh new post-doc arrived and began working with this woman. The foreign born post-doc began experiencing the same bizarre demands that I experienced and after a few incidents they expressed concern for their personal well-being. The post-doc also expressed that they felt they had to do all of the personal favors because they didn't have a green card and couldn't afford to lose their job if they complained or told her no. Once I became aware of what demands were being placed on the post-doc, I filed another complaint and the institution reacted differently. They now claim to have addressed this woman's behavior and they claim they are monitoring her behavior.</p> <p>I am sharing this experience with you today to demonstrate that there are many forms of harassment that are not being reported to governing agencies. When I heard of the NSF's proposed reporting requirements it spurred me to look into NASA's reporting requirements because NASA is our major funding agency. I was saddened to discover how narrow the reporting requirements are for NASA. My institution informed me that what I and the post-doc experienced was not reported to NASA because I am not in a protected class as defined by NASA's reporting requirements. Not only that, my institution makes it difficult to keep track of these types of incidents as just notifying a supervisor or even the EEO officer of persistent, long-term harassment, is not considered an official complaint. So, because the harasser is the same gender as those she harasses, and my institution has a poor reporting system, she slips under the radar. She continues to gain access to people like the post-doc, who have a lot to loose early in their careers. Those who report the behaviors are expected to go away and find something else to do.</p> <p>I believe this unequal reporting shifts the pendulum towards a different type of discrimination than how it is currently defined. All people who receive funding should be held to the same set of standards irregardless of their gender, race or age. I encourage the NSF to require that institutions who receive funding, especially at institutions who have NSF funded Research Experience for Undergraduate programs, report all forms of</p> | Thank you for your comment.  |
| 13 | Introduction | N/A  | It would be helpful to list KEY transition dates in the new PAGGP, such as when Research.gov will need to be utilized as the primary submission platform and when FastLane will be terminated.  | NSF is not in a position at this time to identify specific dates when Research.gov will be the primary submission platform and when FastLane will be terminated.   |
| 14 | Introduction | xi   | 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.  | The Acronym List has been modified to address this issue.  |
| 15 | I.C.4        | I-2  | 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.   | Thank you for your comment. NSF believes that the language on DCLs is provided in the proper location of the PAPPG. As noted, a new sentence has been added to address proposals submitted under DCLs for proposals such as RAPID, EAGER and RAISE.  |
| 16 | I.D.1        | 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. 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.  |
| 17 | II.B.1       | II-2 | We recommend adding a statement about the features in Research.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."  | 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. |

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| 18 | II.C.1.e       | II-6  | <p>We are not proposing any rewrites to the text, rather sharing some concerns or clarifications that may be helpful to the community if integrated into the PAPPG:</p> <p>NOTE: At the NSF Spring 2018 conference, the presenter mentioned that the COA templates can each be uploaded as .xlsx file document type if there are more than 10 individuals designated as senior personnel. These files do not need to be converted to a .txt file before upload to Fastlane which is contradictory of the current NSF PAPPG guidance.</p> <p>ADDITIONAL TEXT recommendation with regard to collaborators from "this proposal" should not be included in Table 4. The answer is contained within the COA FAQ on the NSF website, but not reference in the PAPPG.<br/> <a href="https://www.nsf.gov/bfa/dias/policy/coa/faqs_coatemplatemay18.pdf">https://www.nsf.gov/bfa/dias/policy/coa/faqs_coatemplatemay18.pdf</a><br/> COA FAQ: Should collaborators only be listed if the grant has been funded or should Table 4 list collaborators included in the pending proposal?<br/> Only include collaborators on funded proposals, not the people with whom you are collaborating on the pending proposal</p> | Thank you for your comment. The language regarding 10 or more individuals has not been removed from the section on Collaborators and Other Affiliatos.           |
| 19 | II.C.1.e       | II-7  | <p>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." So 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."</p>  | Thank you for your comment.  |
| 20 | II.C.2.a(4)(a) | II-9. | <p>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.</p>   | Thank you for your comment. We believe the this is appropriately covered in the instructions provided in FastLane and Research.gov.                              |
| 21 | II.C.2.b       | II-12 | <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. 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 characters limit would eliminate this confusion.</p>   | While this was an issue in FastLane at one time, it was corrected to check that the project description is limited to one page. As such, no change is necessary. |
| 22 | II.C.2.e       | II-14 | <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? 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.</p>   | Proposers must follow accepted scholarly practices in providing citations, and as such this may vary by discipline.  |

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| 23 | II.C.2.g(i)(a) | II-16 | 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.   | 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. |
| 24 | II.C.2.g(i)(c) | II-17 | 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, however NSF is not making further changes to FastLane at this time.  |
| 25 | II.C.2.g(xii)  | II-23 | Voluntary Committed and Uncommitted Cost Sharing<br>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.  | If it is included in the Facilities, Equipment & other Resources section of the proposal, it will be reviewable by both reviewers and NSF staff. It is vital that both reviewers and NSF staff have access to this type of information to determine if there are sufficient resources to carry out the project as proposed.  |
| 26 | II.C.2.j       | II-26 | "In such collaborative proposals, the data management plan should discuss the relevant data issues in the context of the collaboration"<br>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."   | 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.  |
| 27 | II.D.4         | II-29 | 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.  | 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.  |
| 28 | II.D.5         | II-31 | 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 "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.  | 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.  |
| 29 | II.C.2.g(v)    | II-19 | First paragraph - UCAR requests more definitive direction on when a speaker/trainer can be included in the PSC section of the budget since the term "primary purpose" is subjective. It would be helpful to have "primary purpose" further defined in terms of the percentage of time at the conference spent speaking/training vs. participating or some other objective measure.<br>Third paragraph - UCAR requests clarification about if catering can be charged as PSC if it is used in lieu of per diem. For example, if the project includes a working lunch and per diem is reduced for participants as a result of the lunch allocation, can that catering be charged as PSC? | This is best determined by the researcher and the organization.  |
| 30 | II.E.7.i(iv)   | II-42 | Same comment as above: UCAR requests more definitive direction on when a speaker/trainer can be included in the PSC section of the budget since the term "primary purpose" is subjective.  | This is best determined by the researcher and the organization.  |

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| 31 | VII.D.3         | VII-8 | UCAR requests clarification on what is meant when a PI submits a Project Outcomes Report (or a Final Project Report as referenced in Chapter VII.D.2 above) and therefore indicates that he/she does not anticipate "any further action on the grant." Specifically, we would like clarification about if the PI needs to wait to submit the Project Outcomes Report and the Final Project Report until after final payment has been requested from NSF since that could be interpreted as an action on the grant.   | This is strictly related to the research and is not related to any financial reporting or aspects of the award. The PI does not need to have a no cost extension, supplement or award (PI) transfer to complete the agreed upon scope of the project.   |
| 32 | Introduction B. | x     | <b><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></b><br><br>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. | The language in the first sentence has been modified to read: G46Part II of the PAPPG sets forth NSF guidance regarding the award, administration, and monitoring of grants and cooperative agreements. NSF is intentional in stating that when a specific section of the PAPPG is cited in an award notification, it becomes part of the award requirements by incorporation by reference. |
| 33 | Introduction E. | xix   | <b><i>Anyone, including grantees, 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></b><br><br>We recommend including the website, <a href="https://www.nsigovfoig/report-fraud/">https://www.nsigovfoig/report-fraud/</a> , 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. Also, the hyperlink needs to be fixed so that the phone number is not part of the email address when you click on "oignsf.gov".   | The comment has been incorporated. However, the website address was corrected to read: <a href="https://www.nsf.gov/oig/report-fraud/">https://www.nsf.gov/oig/report-fraud/</a> . This address provides a variety of methods to reach the OIG, including an internet form, email, phone, anonymous hotline, fax, or mail.  |
| 34 | I.D.3           | I-4   | <b><i>Authors other than the PI (or any co-PI) should be named and acknowledged.</i></b><br><br>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.   |
| 35 | I.E.5           | I-5   | <b><i>Unless specifically authorized in an NSF solicitation (e.g., NSF postdoctoral fellowship programs), unaffiliated individuals in the US and US citizens are not eligible to receive direct funding support from NSF.</i></b><br><br>We suggest inserting "unaffiliated" in front of "US citizens" for greater clarity, such that this sentence reads: "Unless specifically authorized in an NSF solicitation (e.g., NSF postdoctoral fellowship programs), unaffiliated individuals in the US and <u>unaffiliated</u> US citizens are not eligible to receive direct funding support from NSF." (emphasis added).   | The comments has been incorporated.   |
| 36 | I.F.2           | I-7   | <b><i>Proposers should then follow the written or verbal guidance provided by the cognizant NSF Program Officer.</i></b><br><br>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.  |



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| 37 | II.C.2.g(i)(a)  | II-16 | <p><b>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.</b></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."</p> <p>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."</p> <p>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.</p> <p>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.</p> <p>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.</p> | <p>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." 3a. This comment was incorporated last year. 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.</p> |
| 38 | II.C.2.g(v)     | II_19 | <p><b>For some educational projects conducted at local school districts, however, the participants being trained are employees.</b></p> <p>We suggest removing the "however" from this sentence in light of the additional explanation added to the end of the previous paragraph.</p>  | <p>The comment has been incorporated.</p>   |
| 39 | II.C.2.g(vi)(f) | II-21 | <p><b>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.</b></p> <p>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.</p>  | <p>This change would be inappropriate for the PAPPG. This is already appropriately addressed in the Large Facilities Manual.</p>  |
| 40 | II.C.2.i        | II-24 | <p><b>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.</b></p> <p>We recommend 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 collaborators', have been at issue in a number of our cases and requiring this information to be disclosed up front would increase transparency, decrease the likelihood for misrepresentations, and increase our ability to pursue these cases.</p>  | <p>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>  |
| 41 | II.D.8          | II-33 | <p><b>International Research/Education/Training Activities. For each proposal that describes an international activity, PIs should list the primary countries involved on the Cover Sheet. An international activity is defined as research, training, and/or education carried out in cooperation with foreign counterparts either overseas or in the US using virtual technologies.</b></p> <p>We recommend removing "in cooperation with foreign counterparts" from the definition of "an international activity." The current definition requires cooperation with foreign counterparts in order to qualify as an international activity and would not cover activities abroad without a cooperating foreign counterpart, which presumably should fall within this definition.</p>  | <p>NSF believe that it is important to retain the language on foreign collaboration. The intent of this coverage is to highlight true international collaborations rather than research that may happen to be at an international field site or attendance at a conference.</p> <p>Note that the language provides guidance for PIs on proposal preparation, in this case, specifically on about how to complete the proposal cover sheet. As Jessica said, the international activities element has historically been used to identify true international collaborations and to distinguish them from field work or conference participation. The focus is on the nature of the research and education activity, not on whether funds are requested in the foreign travel line of the budget.</p>  |

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| 42 | II.D.8        | II-33 | <i>(See also PAPPG Chapter I.E. for additional information.</i><br>Missing closing parenthesis.   | The comment has been incorporated.   |
| 43 | Exhibit II-3  | II-53 | We recommend updating this reference to: Cost Analysis and Pre-Award Branch, NSF, 2415 Eisenhower Avenue, Alexandria, Virginia 22314.   | The comment has been incorporated .  |
| 44 | Exhibit III-1 | III-8 | We recommend inserting the Research.gov logo next to the other two logos under "Submit," since proposals can now also be submitted via Research.gov in addition to FastLane and Grants.gov.   | Jeremy to incorporate into Exhibit.  |
| 45 | VI.C          | VI-2  | <b><i>When these conditions reference a particular PAPPG section, that section becomes part of the award requirements through incorporation by reference.</i></b><br>Please see our suggestions outlined in comment number 32   | This sentence is consistent with the overall intent of NSF. NSF distinguishes between policies and procedures and terms and conditions of the award.   |
| 46 | VI.D.2.a      | VI-2  | <b><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></b><br>We recommend 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).  | The sentence in question has been revised to read as follows: Except in fixed amount awards, an NSF grant gives authority to the grantee to commit and expend funds in support of the project up to the grant amount specified in the award notice at any time during the grant period.  |
| 47 | VI.D.3.c(i)   | VI-2  | <b><i>Grantees are not authorized to extend an award that contains a zero balance.</i></b><br>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.<br>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. NSF cannot determine whether costs incurred meet or exceed the approved funding amount. Therefore, zero balance refers to the automated check being performed by the NSF system (ACM\$) to determine whether there is a zero balance. 2. The existing guidance articulates the federalwide position on this issue and therefore no changes to the language are necessary. |
| 48 | VII.A.2       | VII-1 | <b><i>2. Grantee Notifications to NSF The following is a listing of grantee notifications to NSF: ... Significant Changes in Methods or Procedures (Other than Changes in Objectives or Scope)... Significant Changes, Delays or Events of Unusual Interest (Other than Changes in Objectives or Scope)</i></b><br>We recommend including an additional bullet in this list or otherwise adding language to the effect of "Regarding Changes in Objectives or Scope, please see Chapter VII, Sec. B, below." A reader looking solely at this section, without turning the page, has no guidance regarding changes in objectives or scope, and an explicit statement here would ensure that all readers understand there are requirements that apply to changes in objectives or scope and where to find them. | NSF believes there is a significant difference between notifications to NSF and requests for prior approval. The sentence after the bulleted list specifically states that "Certain actions require prior approval from NSF." It is therefore not necessary to add a bullet to this list.  |

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| 49 | VII.B.1.a | VII-2  | <p><b>1."The objectives or scope of the project may not be changed without prior NSF approval."</b></p> <p><b>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."</b></p> <p>Suggest hyperlinking the reference to Chapter II.C.2.i for further information. 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 NII.1 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> | NSF does not generally bold or italicize language in the PAPPG. With regard to the second request, NSF modified the language to address these concepts in last year's PAPPG revision.  |
| 50 | VII.B.1.b | VII-2  | <p><b>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.</b></p> <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>   | What constitutes a significant change in methods or procedures is dependant upon the research being conducted, and is best determined by the researcher and the organization.  |
| 51 | VIII.B.11 | VIII-2 | We recommend adding "during the award period" to the end of the new definition of "unexpended balance" to avoid confusion and clarify that awardees are still limited by the award period regarding unexpended balances at the end of awards, absent a no-cost extension.   | The comment has been incorporated.   |
| 52 | VIII.D.1  | VIII-4 | We suggest changing "unliquidated balance" references to "unexpended balance" or explicitly defining "unliquidated balance" in the definitions in Chapter VIII, Sec. B to eliminate potential confusion.  | The comment has been incorporated.   |
| 53 | VIII.E.6  | VIII-8 | <p><b>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.</b></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>   | NSF does not generally bold or italicize language in the PAPPG. With regard to the second request, NSF modified the language to address these concepts in last year's PAPPG revision.  |
| 54 | XII.C.3   | XII-6  | <p><b>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.</b></p> <p>We recommend including the website, <a href="https://www.nsf.gov/foig/report-fraud/">https://www.nsf.gov/foig/report-fraud/</a>, 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.</p>   | The comment has been incorporated. However, the website address was corrected to read: <a href="https://www.nsf.gov/oig/report-fraud/">https://www.nsf.gov/oig/report-fraud/</a> . This address provides a variety of methods to reach the OIG, including an internet form, email, phone, anonymous hotline, fax, or mail. |