

Comments Submitted in Response to the draft Federal Register version of NSF 22-1, NSF Proposal & Award Policies & Procedures Guide (PAPPG)						
Number	Comment Source	Topic	PAPPG Reference(s)	PAPPG Page Numbers	Comment	NSF Response/Resolution
1	Pennsylvania State University	General Comment			The use of the word "should" would better serve proposers by being replaced by the word "must" in most cases in the PAPPG. "Must" is used to illustrate an absolute requirement, whereas "should" is considered ambiguous in the current vernacular and is construed by readers as more of a recommendation or goal. Proposers in the recent past have had proposals rejected for not complying with "should" occurrences in the PAPPG.  Commenters recommend a wholesale review of the words "should" and "must" throughout the PAPPG	Thank you for your comment. The recommended exercise already has been conducted.
2	NSF OIG	Introduction		viii-xx	We suggest including a statement in the Introduction about applicability period(s) of the PAPPG. Since this document is updated annually, it would be helpful to inform proposers and recipients of NSF's intent of which version applies to a specific issue. (Should a recipient comply with the PAPPG version that was in effect when the proposal was submitted, on the initial award date, or when the specific issue took place? If supplemental funding is provided throughout the course of an award, should the recipient follow the PAPPG in effect when the supplement is awarded or follow the original PAPPG throughout the course of the award?)	NSF funding opportunities identify which PAPPG is applicable to proposals submitted under the funding opportunity. The award notice specifies which terms and conditions are applicable to each award.
3	Council on Governmental Relations (COGR)	Fixed Amount Award	Introduction, D. Definitions	xiv	COGR appreciates that NSF has issued clarity that a fixed amount award applies to a grant or cooperative agreement. NSF states that a fixed amount award refers to a type of grant or cooperative agreement in which NSF provides a specific level of support without regard to actual costs incurred under the award. This type of NSF award reduces some of the administrative burden and recordkeeping requirements for both the grantee and NSF. Accountability is based primarily on performance and results. We hope that the inclusion of this definition means that NSF intends to use fixed amount awards more often going forward.	Thank you for your comment.
4	Pennsylvania State University	Letters of Intent	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.
5	NSF OIG	Full Proposals	I.D.3	I-4	"Authors other than the PI (or any co- PI) should be named and acknowledged."  We recommend NSF specify a location for author acknowledgement, for example, as the first entry in the Bibliography. OIG regularly receives queries from both POs and PIs regarding where in the proposal authors not named in the cover sheet should be acknowledged. Clearly stating where such information should be specified would help alleviate confusion and ensure that such information is included and readily identifiable within the proposal. [Note: Carried over from 2018 and 2019]	NSF did not concur with the recommendation and determined that a specific location for identification of this information will not be included.
6	Council on Governmental Relations (COGR)	Pre-Submission Information, Foreign Organizations	I.E.6	I-6	In this section of NSF 22-1, NSF refers to "other direct funding". COGR seeks additional clarity on the meaning of this term and whether NSF anticipates updating the NSF Cover Sheet to reflect the new terminology. COGR also notes the use of "organization," "individual," and "counterpart" in the provision as written invite confusion rather than clarity if those are intended to reference three different entities. COGR recommends that NSF make it clear in this section that counterpart refers to the "foreign" counterparts' individual (which we interpret to be the same as the foreign organization's individual).	Language was revised to address the concerns expressed on "other direct funding" as well as to improve clarity of the requirement.
7	University of Wisconsin-Madison	Foreign Organizations	I.E.6 II.C.2.a II.D.8	I-6 I-10 II-34	Categories of Proposers, page I-6; Cover Sheet, page II-10; International Activities, page II-34  Each of the sections in the heading above makes reference to Foreign Organizations.  • In Categories of Proposers, the part on Foreign Organizations states, "In cases however, where the proposer considers the foreign organization or individual's involvement to be essential to the project and proposes to provide funding to the foreign counterpart through the NSF budget (through a subaward, consultant arrangement, or other direct funding)." • In Cover Sheet, the bullet on Funding of a Foreign Organization states, "including through use of a subaward, consultant arrangement or other direct funding." • In International Activities, the instructions describe a check box for "Funding of a Foreign Organization, including through use of a subaward or consultant agreement."  The first two instances include the wording "other direct funding", while the third instance does not. We wanted to draw attention to this inconsistency in wording and ask for further information. Please elaborate on the meaning of "other direct funding." Does "other direct funding" include planned purchases from foreign vendors? Does "other direct funding" include situations in which a proposing organization intends to employ a foreign national working in a foreign country? We are seeking additional clarification to understand when we are obligated to indicate involvement of a foreign organization or individual.	Language was revised to address the concerns expressed on "other direct funding" as well as to improve clarity of the requirement.
8	NSF OIG	Special Exceptions to NSF's Deadline Date Policy	I.F	I-7	"Proposers should then follow the written or verbal guidance provided by the cognizant NSF Program Officer."  We suggest that approval for exceptions to the deadline date policy only be provided in writing rather than also allowing for the option of verbal approval. Alternatively, we recommend that any verbal approvals must be followed by a written approval within five days to be valid. Many Program Officers are rotators through the Intergovernmental Personnel Act and may be gone by the time a question about the approval arises later in the award, or after an award's conclusion. Thus, it is in NSF's best interest to have the approval documented in writing. [Note: Carried over from 2018 and 2019]	The ability to receive verbal approval only is absolutely vital in cases of natural or anthropogenic events. We have received numerous complaints from PIs who did not even have access to a computer during the natural event, but wanted NSF to be aware that their proposal would not be able to be submitted on time. The Foundation believes that it is vital to retain such flexibility in cases of natural or anthropogenic events.
9	Pennsylvania State University	Target Dates	I.F.1	I-7	Note, most program officials require prior notification from a PI if a proposal will be submitted after a Target Date.	Thank you for your comment. The target date definition is accurate as written.
10	NSF OIG	Submission Instructions	I.G.1	I-8	"Submission of government-wide certifications and representations is addressed below."  We suggest referencing the actual section(s) where the government-wide certifications and representations are addressed. [Note: Carried over from 2019]	Language has been modified for clarity.

	NSF OIG	Requirements Related to DUNS numbers and Registration in SAM	I.G.2	I-8	"Failure to comply with SAM certification requirements prior to proposal submission will impact the processing of the proposal." We suggest specifying the impact to the processing of the proposal (e.g., processing delays, ineligible for proposal submission, etc.). [Note: Carried over from 2019]	Two new sentences were added to the coverage to address the implications of failure to comply with the SAM registration and certification requirements.
1	Coastal Carolina University	Punctuation	II.A	II-1	This last paragraph on page II-1 could use some punctuation attention for clarity: Proposers may deviate from these instructions only to the extent authorized Proposers must include an authorization to deviate from standard NSF proposal preparation instructions through submission of a single-copy document which identifies the name, date and title of the NSF official authorizing the deviation (see section C.1 below for additional information).	Language has been modified for clarity.
2	NSF OIG	Conformance with Instructions for Proposal Preparation	II.A	II-1	"Proposers may deviate from these instructions only to the extent authorized Proposers must include an authorization to deviate from standard NSF proposal preparation instructions through submission of a single-copy document which identifies the name, date and title of the NSF official authorizing the deviation (see section C.1 below for additional information." Missing period between "...authorized. Proposers..." and missing closed parentheses at end "...information.)"	Language has been modified for clarity.
3	CEAT Sponsored Research	Fonts	II.B.2	II-3	A couple of times this past year, faculty members have used Arial 10 point font and then gotten an error message regarding having less than six lines of text within a vertical space of one inch. If Arial 10 point does not meet the spacing requirements, then it should not be given as a font option.	This issue was addressed by NSF as part of the November Proposal Submission Modernization system release where font warnings were turned off. The issue has been resolved and no further action is necessary at this time.
4	NSF OIG	Proposal Certifications	II.C.1.d	II-4	1."Government-wide Certifications and Representations are provided by the proposer on an annual basis in SAM." 2."The AOR must use the "Authorized Organizational Representative function" to sign and submit the proposal, including NSF-specific proposal certifications." "The required proposal certifications are as follows..." Several government-wide certifications were removed to implement M-18-24, including Drug-Free Workplace, Debarment and Suspension, Certification Regarding Lobbying, Certification Regarding Nondiscrimination, Certification Regarding Federal Tax Obligations, and Certification Regarding Criminal Convictions. All other certifications that must be provided via the AOR function in NSF's electronic system are still included in this section. However, the language does not make it clear that only NSF-specific proposal certifications are now listed. We suggest specifying that the included proposal certifications are only the NSF-specific proposal certification, and the government-wide certifications are in SAM. [Note: Carried over from 2019]	Language has been modified for clarity.
5	CEAT Sponsored Research	Collaborators and Other Affiliations	II.C.1.e	II-5	It would be helpful if there could be a link to the COA template at the place where the Collaborators & Other Affiliations Information instructions are provided on pages II-5 through II-6. Maybe I am overlooking it, but I can't find a link to the COA template anywhere in the draft PAPPG.	The link is available in the PAPPG.
6	Pennsylvania State University	Title of Proposed Project	II.C.2.a	II-8	Please add clarification that the title is limited to 180 characters, per the FastLane system; and (we think) 135 characters, per the Research.gov system.	Thank you for your comment. The PAPPG is a guidance document, and technical details of this nature are available in NSF corporate systems.
7	Pennsylvania State University	Project Summary	II.C.2.b	II-10	This requirement is not just one page in length, but it appears to have a character limit if entered in the text boxes in FastLane. We request that the current character limit be added to the text. Clarification for both FastLane and Research.gov would be suggested.  When the proposal team prepares draft text, they often perform this editing phase outside of the FastLane system with a word processor such as MS Word. Once the project summary has been finalized and pasted into the text boxes, faculty are often surprised that their "1 page" Word summary doesn't fit into the defined space within FastLane. This results in many iterations as the faculty work to reduce the amount of text to fit the FastLane allotted space. Listing the character limit would eliminate this confusion.	Thank you for your comment. The requirement is one page in length.
8	NSF OIG	Biographical Sketch	II.C.2.f(i)	II-13	"This section of the proposal is used to assess how well qualified the individual, team or organization is to conduct the proposed activities." We recommend supplementing the new contextual language to also address the important issue of conflicts of commitment, along the lines of the following (new proposed text in italics):  "This section of the proposal is used to assess how well qualified the individual, team or organization is to conduct the proposed activities <i>and also to assess what other commitments, appointments, and affiliations may take up senior personnel's time.</i> "	The purpose of the biographical sketch is not to assess what other commitments, appointments and affiliations "may take up senior personnel's time". The introductory statement that "This section of the proposal is used to assess how well qualified the individual, team or organization is to conduct the proposed activities." is accurate as stated.
9	NSF OIG	Biographical Sketch	II.C.2.f(i)	II-13	"A separate biographical sketch (limited to two pages) must be provided through use of an NSF-approved format, for each individual designated as senior personnel." We suggest exempting the appointments section of the biographical sketch from the two page limit or increasing the number of allowable pages so there's room to disclose all appointments, as required. Subjects in a number of investigations have cited the two-page limitation, and the lack of room, as a reason for why they did not disclose all appointments as required by NSF rules.	The page limitation of the biographical sketch will be expanded to three pages. In the next PAPPG, consideration will be given to breaking out the appointments section to ensure that adequate space is provided to specify all required appointments, with expanding
10	Colorado School of Mines	Biographical Sketch	II.C.2.f	II-13	Some of our PIs completed their University studies in their home country or abroad and we've heard from these faculty they are unable to create a biosketch via sciencv as their educational institutions are foreign and the form does not allow for input of foreign universities. Update sciencv to allow for inclusion of foreign institutions on biographical sketch	NSF verified with NIH/NLM that this is not an issue. Faculty at foreign institutions of higher education are able to use SciENcv to develop biographical sketches. No further action is necessary.
11	Pennsylvania State University	References Cited	II.C.2.e	II-13	We request clarification be added for references of large collaborative groups, i.e., CREAM and ICE CUBE, where there are hundreds of authors and collaborators to list. Should these be listed in their entirety or are et. al.'s acceptable? Should a full list be loaded into supplemental documents or single documents? Jean Feldman provides clarifications around this point in many of her presentations and conferences. It would benefit the community to have her recommendations included in the PAPPG.	"et al" has been addressed in the PAPPG.
12	Pennsylvania State University	Biographical Sketch	II.C.2.f	II-14	For Professional Preparation: For the "Location"; please include format examples...see below suggestions: *Location (city, state) *Location (city, foreign country)	Thank you for your comment.

13	Pennsylvania State University	Biographical Sketch	II.C.2.f	II-14	Synergistic Activities: Current sentence reads, "Synergistic activities should be specific and must not include multiple examples...." We suggest further clarification around the types of items NOT permitted. Possible edit to sentence: "Examples with multiple components, such as committee member lists, sub bulleted highlights of honors and prizes, or a collection of grants and research awards, are not permitted."	Language has been modified for clarity.
14	Pennsylvania State University	Biographical Sketch	II.C.2.f	II-14	Synergistic Activities: Suggest - Do not include lists of honors and awards, nor lists of research grants received.	Language has been modified for clarity.
15	Council on Governmental Relations (COGR)	Biographical Sketch	II.C.2.f(i)(b)	II-14	COGR suggests the following highlighted additions to this section to be more consistent with NIH terminology. The proposed language also clarifies that the requirement to identify appointments is driven by the need to identify conflicting obligations.  (Excerpt from NSF 22-1) (b) Appointments: A list, in reverse chronological order by start date of all the individual's academic, professional, or institutional appointments, beginning with the current appointment. Appointments include any titled academic, professional, or institutional position whether or not remuneration is received, and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary). With regard to professional appointments, senior personnel must identify all current domestic or foreign professional appointments <i>relevant to the application</i> outside of the individual's academic, professional, or institutional appointments at the proposing organization <i>that incur conflicting obligations between or among the proposing organization and other employers or third-party entities.</i>	This new proposed language goes beyond the stated purpose of the biographical sketch.
16	NSF OIG	Biographical Sketch	II.C.2.f(i)	II-14	"With regard to professional appointments, senior personnel must identify all current domestic or foreign professional appointments outside of the individual's academic, professional, or institutional appointments at the proposing organization."  We recommend keeping the proposed language to help clarify expectations for the grantee community.	Thank you for your comment.
17	Colorado School of Mines	Biographical Sketch	II.C.2.f(ii)	II-15	Rather than allow a freeform biographical sketch for Other Personnel, mandate use of either NSF fillable biographical sketch OR sciencv biographical sketch. Both these options are allowable, work for all personnel, and are in use currently.  The current NSF biosketch templates have been vetted by SPOs, Pls, and NSF AND include a FAQ for everyone's use whereas a freeform document will not provide consistent data from person to person	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.
18	NSF OIG	Budget and Budget Justification	II.C.2.g	II-15	"This section of the proposal is used to assess whether there are adequate resources available to the PI (either at the home organization or through collaborations) to carry out the proposed activities."  This text relates more to the "Facilities, Equipment and Other Resources" section than the budget and budget justification. We propose new alternative contextual language explaining the purpose of the budget and budget justification along the lines of the following:  "The proposal budget sets forth how much money the awardee is requesting, by category, to complete the project. The budget justification provides a more detailed breakdown of proposed spending in each category as well as an explanation supporting the numbers provided in each budget category. This information is relied upon by NSF in formulating the total award amount and final award budget that is incorporated into the award. (See PAPPG, Chapter VI, Section B.1)"	Language has been modified for clarity.
19	Pennsylvania State University	Budget and Budget Justification	II.C.2.g	II-15	Collaborative proposal budgets submitted individually by multiple organizations must include a separate budget justification of no more than five pages.	Language has been modified for clarity.
20	NSF OIG	Senior Personnel Salaries and Wages Policy	II.C.2.g(i)(a)	II-16	"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."  The purpose of this "general policy" appears to be to implement the preceding paragraph: "NSF regards research as one of the normal functions of faculty members at institutions of higher education. Compensation for time normally spent on research within the term of appointment is deemed to be included within the faculty member's regular organizational salary."  1.We suggest strengthening the last sentence quoted above by adding, "NSF funds are not intended to subsidize normal functions already required of faculty members and included in faculty salaries."  2.Although NSF states its "general policy" for senior personnel compensation as a limit, awardees are allowed to exceed this limit "(u)nder normal rebudgeting authority." We suggest that NSF should either (a) move away from the 2-month salary limit and develop a new means to implement its position that faculty members' institutional salaries include compensation for research, or (b) enforce the limit by requiring specific NSF approval for senior personnel salaries in excess of two months per year.  3.We suggest that NSF affirmatively state that the senior personnel salary policy applies to all employees included in the senior personnel section of the proposal budget, regardless of their job classification within the institution.  4.The policy states that "no prior approval from NSF is necessary unless the rebudgeting would cause the objectives or scope of the project to change." We suggest that NSF provide guidance to assist awardees in determining whether a proposed change would result in a change of project scope or objectives. [Note: Carried over from 2018 and 2019]	1. NSF believes the PAPPG language meets the spirit and intent of the recommended language. 2. As previously determined by the NSF Audit Follow-up Official "NSF and its awardees are partners in the research enterprise as acknowledged via the assistance award funding mechanism. By the nature of assistance awards, awardees have the responsibility to determine how best to achieve stated goals within project objective or scope. Given this need for flexibility, proposed project budgets with personnel compensation in excess of two months must be approved by NSF and included in the award notice. However, research often requires adjustments, and NSF permits post award re-budgeting of faculty compensation. NSF is aligned with federal guidelines and regulations in allowing re-budgeting of such compensation without prior Agency approval, unless it results in changes to objectives or scope." 3. 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. 4. What constitutes a change in objective or scope is dependent upon the research being conducted, and is best determined by the researcher and the organization.

21	Anonymous	Biographical Sketch & Current and Pending Support Formats	II.C.2.f II.C.2.h	II-13 II-24	<p>The new Biosketch and current and pending formats are exceptionally cumbersome and result in a significantly increased administrative burden on research administrators.</p> <p>There needs to be a procedure in place to more easily identify the source of biosketches created with sciencv to ensure compliance. Research administrators collecting bios from many faculty, sometimes across multiple institutions for collaborative proposals need an easy, quick way to determine the source of the documents to ensure that they are compliant. There needs to be more flexibility in the fillable PDFs for space between categories. There needs to be a better way to eliminate compliance issues when completing the fillable PDFs with a web browser.</p> <p>The current and pending procedures are extremely burdensome for large proposals. NSF should move to a JUST in TIME procedure for current and pending, similar to NIH. The current procedure is a massive administrative burden, especially for the large proportion of proposals that are not funded and this burden is exponentially increased with the new formatting requirements. At a minimum, NSF should drop the requirement to include the proposal currently being submitted on current and pending forms. Title and especially budget are often not finalized until late in the proposal preparation process. This results in undue administrative burden to update this information on current and pending forms. This problem is complicated further when faculty use sciencv to generate current and pending and research administrators can not easily update the information. This is especially burdensome for large proposals with many researchers, and even more so for collaborative proposals that include faculty from multiple institutions.</p> <p>The administrative burden for these new formats is real, and excessive, and not fully understood by NSF policy makers. I'd encourage you to engage more with research administrators prior to making these types of changes to more fully evaluate the impact.</p>	Thank you for your comment. NSF continues to explore options to ensure that administrative burden is minimized, to the extent possible.
22	Pennsylvania State University	Budget and Budget Justification	II.C.2.g	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.	Thank you for your comment. Given that NSF's 2-month policy is applied at the budget submission stage, we believe that it is vital that this language be retained.
23	Pennsylvania State University	Senior Personnel Salaries and Wages Policy	II.C.2.g(i)(a)	II-16	We request a revision to how the FastLane Budget Page collects and sorts the names listed under Section A. Senior Personnel. It would be preferred to always have the PI show as the first person in Section A, with the remaining Senior Personnel falling into alphabetical order.	No further changes are being made to the NSF FastLane system as we transition to Research.gov for proposal preparation and submission.
24	NSF OIG	Subawards	II.C.2.g(vi)ε	II-20-21	<p>"Proposers are responsible for ensuring that proposed subrecipient costs, including indirect costs, are reasonable and appropriate."</p> <p>We recommend keeping the proposed language to help clarify expectations for the grantee community.</p>	Thank you for your comment.
25	NSF OIG	Home Office Workspace	II.C.2.g(xiii)(d)	II-23	<p>"Rental of any property owned by individuals or entities affiliated with NSF grantees (including commercial or residential real estate), for use as home office workspace is unallowable."</p> <p>We recommend adding additional clarifying language around the allowability of all Home Office Workspace expenditures. The new provision only speaks to rentals of property. What about purchase of property? Does this apply to real property, other tangible materials/supplies/equipment for furnishing home offices, etc.? The answers to these questions will continue to be pertinent as awardees grapple with the ongoing pandemic and contemplate new ways of conducting business post-pandemic.</p>	This requirement would go beyond the requirement specified in 2 CFR 5200. As such, NSF believes this request is best addressed by the Office of Management and Budget's (OMB) Office Federal Financial Management (OFFM).
26	NSF OIG	Current and Pending Support	II.C.2.h(i)	II-24	<p>"This section of the proposal is used to assess the capacity of the individual to carry out the research as proposed as well as to help assess any potential overlap/duplication with the project being proposed."</p> <p>We recommend supplementing the new contextual language to emphasize the importance of current and pending support in determining the amount of time each senior personnel has available for the project and assessing potential conflicts of commitment, consistent with NSF's outreach to the grantee committee in recent years, along the lines of the following (new proposed text in italics): "This section of the proposal is used to assess the capacity of the individual to carry out the research as proposed <i>and to identify potential conflicts of commitment</i> as well as to help assess any potential overlap/duplication with the project being proposed."</p>	The current and pending support disclosure is used to assess capacity and overlap/duplication. NSF's Conflict of Interest (COI) policy for proposers and awardees is a separate and distinct requirement and that is where COI and Conflict of Commitment issues are addressed at the organizational level.
27	NSF OIG	Current and Pending Support	II.C.2.h(i)	II-24	<p>Footnote 29: "Proposers are strongly encouraged to review the Frequently Asked Questions regarding Current and Pending Support prior to preparation of this section of the proposal."</p> <p>We recommend including a URL and/or hyperlink to the relevant FAQ, or at least a link to a static webpage on NSF's current and pending support policy that links to the FAQ so the referenced document is easy for applicants to find and review.</p>	Thank you for your comment. NSF always inserts relevant links prior to publication on the NSF website.
28	NSF OIG	Current and Pending Support	II.C.2.h(iii)	II-24	<p>Language from footnote moved to full text.</p> <p>We recommend keeping the proposed language in the main text of the PAPPG to help clarify expectations for the grantee community and appropriately emphasize the importance of this information.</p>	Thank you for your comment.
29	Council on Governmental Relations (COGR)	Current and Pending Support	II.C.2.h	II-24	<p>Suggestions if Harmonization with NDAA 2021 is Not Immediately Possible:</p> <p>We appreciate the clarifications that NSF has made to make this section clearer by incorporating text from NSF's FAQs into the Current and Pending Support provision. The "associated time commitment" concept from the FAQs was extremely important in helping researchers better understand what should be reported and should be reflected in the PAPPG. However, if harmonization between NDAA 2021 and the PAPPG cannot immediately be accomplished, we offer the following suggestions to the current language of NSF 22-1 regarding current and pending support:</p> <ul style="list-style-type: none"> <li>• There has been a tremendous amount of confusion about what is appropriately "related to" a faculty member's research. NSF is instructing (per question 15 on the FAQ) not to include consulting unless the faculty member is doing research as part of that consulting agreement. Without the clarifying language suggested below, a faculty member's consulting activities in which they are not doing any research could easily be "related to" their research. The additional wording makes it clearer that there is a difference between a source of support that is merely related to a faculty member's research expertise and a source of support that is directly related to the conduct of their research.</li> <li>• We ask NSF to clarify that "in-kind support" does not include "in-kind support under a fundamental research collaboration for the sole purpose of co-authorship to be made publicly available," along the lines of the approach used by the Department of Energy in Order 486.1A, Attachment 2, Sec. 9b.(5)(a).</li> </ul>	Bullet 1: NSF requirement to disclose consulting will be revised to read, "Consulting that is permitted by an individual's appointment and consistent with the proposing organization's "Outside Activities" policies and procedures need not be disclosed." Bullet 2: A new FAQ will be added to address that addresses the fact that in-kind support was not envisioned to include collaborative activities.

30	University of Wisconsin-Madison	Biographical Sketch	II.C.2.f	II-24	Thank you for replicating the language from the NSF website about outside professional appointments in the PAPPG. Doing so provides clarity for our researchers in the primary source of information for proposal preparation. We are also appreciative that NSF has included the option to use "et al." in the product citation information in lieu of listing all authors' names. This guidance will help our researchers stay compliant with the two-page biosketch limit.	You are most welcome.
31	NSF OIG	Current and Pending Support	II.C.2.h(iv)	II-24	"A brief statement of the overall objectives of the proposal/project or in-kind contribution must be provided. The submission also should summarize potential overlap with any active or pending proposal or in-kind contribution and this proposal in terms of scope, budget, or person-months planned or committed to the project for the individual."  We recommend keeping the new requirement for a brief statement of objectives to help NSF and reviewers assess overlap/duplication. Doing so will facilitate stronger grant oversight and reduce the likelihood of duplicate/overlapping funding.	Thank you for your comment.
32	NSF OIG	Current and Pending Support	II.C.2.h(v)	II-24	"The information contained in the budget section of the proposal is separate and distinct from the information entered in current and pending support, and each of these sections is used for a different purpose in NSF's merit review process."  We recommend keeping this new clarification language to ensure applicant expectations are clear for each section of the proposal.	Thank you for your comment.
33	NSF OIG	Current and Pending Support	II.C.2.h(vi)	II-24	"If the project (or any part of the project) now being submitted has been funded previously by a source other than NSF, provide the required information describing the last period of funding."  We recommend NSF adopt similar language to NIH Form PHS 398/2590 Other Support, which requires explicit statements to address any potential overlap (scientific, budget, effort level) and how it would be resolved. [Note: Carried over from 2019]	New statements on the overall objectives of the proposal/project as well as a statement summarizing any potential overlap were already added to the draft language posted in the Federal Register. NSF plans to supplement the NSF-approved formats to include these two new data elements.
34	NSF OIG	Facilities, Equipment and Other Resources	II.C.2.i	II-24	"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."  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. These differences have implications regarding grantee's rights and continued access to facilities necessary to carry out the project. Additionally, 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. [Note: Carried over from 2018 and 2019]	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. NSF plans to include this in the next "For Comment" draft of the PAPPG.
35	Duke University	Current and Pending Support	II.C.2.h	II-24	With regard to the PAPPG, we endorse and support the Council on Government Relations (COGR) letter dated February 10, 2021. In particular, we would like to emphasize the importance of alignment and harmony of guidance, particularly as it relates to definitions and forms related to Current & Pending Support/Improper Influence. Process and regulatory alignment are critical as we implement this guidance.  However, it's should be noted that alignment and harmony should not mean absolute "sameness"; as agencies & sponsors have different missions, it is understandable that aspects of guidance will have to be principle-based to allow necessary differences. Similarly, universities and research institutions are often quite unique in structure, culture, internal control environments, degree of leveraged technology, etc. And therefore, like other areas in the PAPPG and Uniform Guidance (2 CFR 200), it is critical to support some level of regulatory flexibility of implementation while staying within the necessary and reasonable compliance boundaries of the guidance.	Thank you for your comment.
36	Colorado School of Mines	Current and Pending Support	II.C.2.h	II-24	Include FAQs in the actual text and not as a footnote  Regarding overlap will there be a new fillable C/P and sciencv C/P form? How will you ensure the text limit is sufficient for each PI to describe her/his overlap? Has the new C/P form been vetted by PIs, SPOs, and NSF?	FAQs are a reference document and as such, we believe the placement is appropriate. NSF is continually engaging with the community on the PAPPG requirements. The vetting of new requirements is precisely what the Federal Register process is intended to address.
37	Council on Governmental Relations (COGR)	Current and Pending Support	II.C.2.h	II-24	(Excerpt from NSF 22-1 marked to show suggested changes) h. Current and Pending Support  This section of the proposal is used to assess the capacity of the individual to carry out the research as proposed as well as to help assess any potential overlap/duplication with the project being proposed. (ii) Current and pending support information must be separately provided through use of an NSF-approved format, for each individual designated as senior personnel on the proposal. Current and pending support includes all resources <i>with an associated time commitment that are</i> made available to an individual in support of and/or <i>directly</i> related to <i>the conduct</i> of his/her research. Current and pending support also includes in-kind contributions <i>with an associated time commitment</i> that are not intended for use on the project/proposal being proposed. <i>In kind contributions with no associated time commitment and not for use on the project are not required to be reported. Further, in-kind support does not include in-kind support under a fundamental research collaboration for the sole purpose of co-authorship to be made publicly available.</i> (iii) Current and pending support information must be provided for this project, for ongoing projects, and for any proposals currently under consideration from whatever source irrespective of whether such support is provided through the proposing organization or is provided directly to the individual. This support includes, for example, Federal, State, local, foreign, public, or private foundations, non-profit organizations, industrial or other commercial organizations or internal funds allocated toward specific projects. (iv) A brief statement of the overall objectives of the proposal/project or in-kind contribution must be provided. The submission also should summarize potential overlap with any active or pending proposal or in-kind contribution and this proposal in terms of scope, budget, or person-months planned or committed to the project for the individual. (v) The total award amount for the entire award period covered (including indirect costs) must be provided, as well as the <i>estimated</i> number of person-months (or partial person-months) per year to be devoted to the project by the individual. (vi). Concurrent submission of a proposal to other organizations will not prejudice its review by NSF, if disclosed. If the project (or any part of the project) now being submitted has been funded previously by a source other than NSF, information must be provided regarding the last period of funding.	NSF requires disclosure of all sources of current and pending support. The suggested language would require disclosure of only the support directly related to the conduct of the proposer's research. This would be a fundamental change in policy. Additionally, regarding the suggested language on in-kind contributions that are part of a fundamental research collaboration, exchanges under a fundamental research collaboration are not considered in-kind support and therefore NSF thinks this suggested language is not appropriate for this section.

38	Council on Governmental Relations (COGR)	Current and Pending Support	II.C.2.h	II-24	<p>Harmonization with National Defense Authorization Act for Fiscal Year 2021:</p> <p>The notice for comments on NSF 22-1 was published prior to the enactment of the National Defense Authorization Act for Fiscal Year 2021 (NDAA 2021) in January 2021. Section 223 of NDAA 2021 instructs research agencies to develop provisions in applications for research and development awards that require "covered individuals" to "disclose the amount, type, and source of all current and pending research support received by the individual as of the time of the disclosure." NDAA 2021 also contains a definition of the term "current and pending research support" and charges OSTP with ensuring consistency. Although aspects of NDAA 2021 are similar to those of NSF policy in this area, the NDAA definitions are much clearer and therefore easier to implement. As this is now a statutory requirement, we hope that NSF will more closely align the terms and requirements of the NSF 22-1 regarding the disclosure of current and pending support with those specified in the NDAA 2021. Not only would this alignment ensure consistency with this legislation, the improved clarity and eventual consistency among agencies would also promote compliance efforts.</p>	NSF does not believe that the difference between the NDAA language and NSF current and pending support requirements has been clearly articulated within the comment provided. We also wait further guidance to be issued by OSTP. As such, no changes will be made at this time.
39	University of Wisconsin-Madison	Current and Pending Support	II.C.2.h	II-24	<p>We wanted to emphasize our support for COGR's suggestions for the Current and Pending Support section of the PAPPG. We believe that additional language will help clarify to our researchers what activities need to be included in Current and Pending Support documents. An alternative to incorporating the suggested language in the second sentence of part (ii) of this section would be to adopt the definition of "current and pending research support" in the National Defense Authorization Act for FY 2021, Sec. 223, which is:</p> <p>The term "current and pending research support"--  (A) means all resources made available, or expected to be made available, to an individual in support of the individual's research and development efforts, regardless of--  (i) whether the source of the resource is foreign or domestic;  (ii) whether the resource is made available through the entity applying for a research and development award or directly to the individual; or  (iii) whether the resource has monetary value; and  (B) includes in-kind contributions requiring a commitment of time and directly supporting the individual's research and development efforts, such as the provision of office or laboratory space, equipment, supplies, employees, or students.</p> <p>We also consider it important to incorporate language from the Current and Pending Support FAQs on the NSF website in the PAPPG to ensure that it is included in the primary source of information for proposal preparation.</p>	See response above.
	Pennsylvania State University	Current and Pending Support	II.C.2.h	II-24	<p>It would also be helpful for the electronic format to have a way to delineate between projects being supported by the investigator's institution vs. projects an investigator manages on their own.</p> <p>Inclusion of non-institutional support and activities are not "verifiable" details that an institutional AOR can confirm before submission or should be held accountable to confirm.</p>	Whether the information is differentiated between the organization and the individual will not impact the assessment of the information provided to NSF.
1	Pennsylvania State University	Current and Pending Support	II.C.2.h	II-24	<p>In particular, guidance is requested for:</p> <p>Source of Support - can researchers list generic sources (gifts, or private consulting), or will you require the specific funding source name?</p> <p>Location of project - needs instructions for when an activity is outside the home institution.</p> <p>Person-months per year - can this be left blank if only in-kind support is received?</p>	The FAQs already address the requirement to identify unrestricted gifts, as well as in-kind contributions without an associated time commitment. Location is a well established data element on NSF and federal-wide forms and formats.
2	Pennsylvania State University	Current and Pending Support	II.C.2.h(v)	II-24	<p>We're not sure how the first highlighted sentence in this section adds clarity. Is the intent to say that the total award amount and the person-months shown on the budget do not have to be the same as what is shown on the current and pending support fields so don't sweat it if they don't? I can't think of a situation where the award amount would differ, but I can for the number of person-months. For example, if no person mos. or salary is requested for senior personnel, they don't show up on the budget, but they still have a time commitment to the project.</p>	As written, the comment itself answers the question posed.
3	University of North Carolina at Ashville	Vertebrate Animals	II.D.4.e(ii) II.D.4.e(iii)	II-30	<p>Request clarification in wording regarding "Proposals Involving Vertebrate Animals." Specifically, para. 4.e.(ii) and 4.e.(iii). Not all schools have a PHS Approved Animal Welfare Assurance Number as required by the language. This is because neither NSF or PHS issue numbers to schools without animal welfare funding. Once funded, the school can request from NSF to petition PHS for an Animal Welfare Assurance Number. The current language mandates something that is unattainable for schools entering the field of vertebrate animal studies.</p> <p>Recommendation to insert language that clearly allows non-PHS Approved Animal Welfare Assurance schools to add Pending to the appropriate blanks. When funded, the school can then work with NSF to acquire the appropriate approvals to obtain an official PHS assurance. This will also reduce confusion with research admin offices, investigators and reviewers that the current language creates. Specifically, language requires a PHS assurance prior to submission. This is unattainable as NSF will not coordinate an assurance without a funded project. Schools are then placed into a catch twenty-two situation - can't submit a proposal because the schools does not have an assurance but unable to get an assurance because your school has no animal studies.</p>	Language has been added to address the issue raised.
4	Pennsylvania State University	RAPID, EAGER, RAISE	II.E.2 II.E.3 II.E.4	II-35-37	<p>Add "including indirect costs" after the maximum award amount.</p>	Comment incorporated. This parenthetical also was added to other proposal types specified in Chapter II.E., as appropriate.
5	University of Wisconsin-Madison	Career-Life Balance Supplemental Funding Requests	II.E.8	II-42-43	<p>We would like to express our thanks to NSF for including the Career-Life Balance Supplemental Funding Request instructions in the PAPPG, thereby moving it to the primary source of information for proposal preparation.</p> <p>On page II-43, we suggest that the two paragraphs immediately preceding part d (which begin, "For all eligible categories noted above, the supplemental funding...") might flow better if included in part d. The two paragraphs do not specifically apply to part c, even though that is where they are located. NSF could also consider adding a clarifying phrase, for instance, "For all eligible categories noted above, in parts a-c, the supplemental funding..."</p>	Language has been modified for clarity.

6	Council on Governmental Relations (COGR)	Career-Life Balance Supplemental Funding Requests	II.E.8	II-42-43	COGR appreciates this new opportunity allowing institutes of higher education to request additional funding for the variety of reasons NSF has specified.	Thank you for your comment.
7	Council on Governmental Relations (COGR)	Travel Proposals	II.E.11	II-48	COGR understands that this section is intended for the situation where the meeting organizer is someone other than the prime recipient institution. Assuming this is correct, COGR requests the following additions to the paragraph for clarity. Alternatively, the language below could be included as a term and condition of the award, which would help to avoid last-minute issues if the meeting organizer did not have a policy at time of application. We believe that so long as a policy is provided to the institution's AOR prior to travel, this would be sufficient to comply with NSF's intent of the provision.  (Excerpt from NSF 22-1 PAPPG) Travel Proposal – Chapter II, Section E (11) By signing the Cover Sheet, the AOR is certifying that <i>prior to the proposer's participation in the meeting, the proposer will assure</i> that the meeting organizer <i>has</i> a written policy or code-of-conduct that addresses sexual harassment, other forms of harassment, and sexual assault, and that includes clear and accessible means of reporting violations of the policy or code-of-conduct. The policy or code-of-conduct must address the method for making a complaint as well as how any complaints received during the meeting will be resolved. The proposer is not required to submit the meeting organizer's policy or code-of-conduct for review by NSF.	Language has been modified to address concern raised.
8	University of Wisconsin-Madison	Travel Proposals	II.E.11	II-49	We concur with COGR's suggestion that the certification language be amended or be inserted as a term and condition. Given that proposals are sometimes submitted shortly before the proposal deadline, there may not be sufficient time to affirm prior to proposal submission that a meeting organizer has a written policy or code-of-conduct as described.	Language has been modified for clarity.
9	NSF OIG	Travel Proposals	II.E.11	II-49	"Proposal Budget and Budget Justification: ... See Chapter XI.F for additional information."  We recommend keeping the expanded, clarifying language to ensure applicants and awardees understand documentation requirements and what costs are not allowable under Travel Proposals.	Thank you for your comment.
10	NSF OIG	Part II Intro	Part II	VI-1	"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."  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. [Note: Carried over from 2018 and 2019]	Thank you for your comment. In large part, the PAPPG provides guidance and explanatory material to proposers and awardees. Therefore, it would be inappropriate to impose on NSF awardee organizations the requirement to comply with all such guidance and explanatory material as terms and conditions of an NSF award. NSF strongly believes that the articles specified in the General Conditions clearly articulate the parts of the PAPPG that are indeed requirements imposed on an awardee, and, for which they will be held responsible.
11	Pennsylvania State University	Resubmission	IV.E	IV-5	Recommend replacing the current text as follows:  A declined proposal may be resubmitted, but only after it has undergone substantial revision. A resubmitted proposal that has not clearly taken into account the major comments or concerns resulting from the prior NSF review may be returned without review. Proposers may include a brief introductory paragraph describing the revisions resulting from the review, but this is optional. Although it will be a resubmitted proposal, the Foundation will treat the resubmitted proposal like a new proposal in every other way, and it will be subject to the standard review procedures. The reviewers for the resubmitted proposal may or may not be the same people, depending on individual availability. NSF programs that accept proposals at any time may have established guidelines in which a declined proposal (or reasonable facsimile of that proposal/topic by the same PI, and co-PIs, where applicable) is ineligible for resubmission for a specified period of time. This moratorium allows PIs/co-PIs sufficient time to digest the results of the merit review and revise/restructure the declined proposal accordingly. Please note that a proposal that the program considers too similar to a previous proposal that is under the moratorium period may be returned without review.	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.
12	NSF OIG	NSF Award Conditions	VI.C	VI-2	"When these conditions reference a particular PAPPG section, that section becomes part of the award requirements through incorporation by reference."  Please see our suggestions outlined in comment number 34. [Note: Carried over from 2018 and 2019]	Thank you for your comment. In large part, the PAPPG provides guidance and explanatory material to proposers and awardees. Therefore, it would be inappropriate to impose on NSF awardee organizations the requirement to comply with all such guidance and explanatory material as terms and conditions of an NSF award. NSF strongly believes that the articles specified in the General Conditions clearly articulate the parts of the PAPPG that are indeed requirements imposed on an awardee, and, for which they will be held responsible.
13	NSF OIG	Changes in Objective or Scope	VII.B.1.a	VII-2	"The objectives or scope of the project may not be changed without prior NSF approval."  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 (> 25%) rebudgeting of costs among budget categories, which indicates a material change in the research methodology. [Note: Carried over from 2018 and 2019]	Thank you for your comment. What constitutes a change in objective or scope is dependent upon the research being conducted, and is best determined by the PI and any co-PIs and the awardee organization.

14	NSF OIG	Significant Changes in Methods or Procedures	VII.B.1.b	VII-2	<p>"Significant changes in methods or procedures should be reported to appropriate grantee official(s). The PI also must notify NSF via use of NSF's electronic systems."</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?" [Note: Carried over from 2018 and 2019]</p>	Thank you for your comment. What constitutes a significant change in methods or procedures is dependent upon the research being conducted, and is best determined by the PI and any co-PIs and the awardee organization.
15	NSF OIG	Withdrawal of PI or co-PI	VII.B.2.d	VII-3-4	<p>"(i) initiate transfer of the grant as described in Chapter VII.B.2.f; (iii) initiate grant closeout procedures through submission of final reports as described in Chapter VII.D.2."</p> <p>We recommend clarifying whether these actions (i and iii) apply only to a PI withdrawal or if they also apply to a co-PI withdrawal. Additionally, we recommend ensuring that these actions (i and iii), designate an award for financial closeout prior to NSF's regularly scheduled close out date (similar to selecting the Final Flag on the ACM\$ payment screen).</p>	Language has been revised to address comment.
16	NSF OIG	Grant Closeout	VII.D.5	VII-9	<p>"Grants are administratively closed after receipt of the Final Project Report and Project Outcomes Report and after determination that any other administrative requirements in the grant have been met."</p> <p>We recommend providing list of other administrative requirements that may exist. For example, final inventory report as described in (Chapter IX. D.4, or cost share report as described in Chapter VII.C.3).</p>	No action necessary. The other administrative requirements are already identified in the terms and conditions.
17	NSF OIG	Grant Closeout	VII.D.5	VII-10	<p>"In accordance with 2 CFR §200.344(i), if the grantee does not submit all required reports within one year of the period of performance end date, NSF must report the grantee's material failure to comply with the terms and conditions of the award with the OMB-designated integrity and performance system (currently FAPIIS)."</p> <p>We recommend modifying "required reports" to "required technical reports" for greater clarity.</p>	In accordance with 2 CFR §200.344, all reports must be submitted within 1 year of the period of performance end date. No action necessary.
18	NSF OIG	Post-End Date Costs	X.A.2.c	X-2	<p>"However, in accordance with 2 CFR §200.461, grantees may charge the NSF award before closeout for the costs of publication or sharing of research results, if the costs are not incurred during the period of performance of the award. Publication costs such as this should be charged in the final budget period of the award, unless otherwise specified by NSF."</p> <p>We recommend a requirement for Program Officer review of these costs for reasonableness. There is a risk that recipients could use this provision as a loophole to draw remaining unspent funds on an award regardless of the actual need and amount of publication and info sharing costs.</p>	Because the stated recommendation goes beyond the requirement specified in 2 CFR §200.461, this would be better addressed by OMB/OFFM.
19	NSF OIG	Prohibition on Certain Telecommunications and Video Surveillance Services or Equipment	X.F	X-7	<p>"F. Prohibition on Certain Telecommunications and Video Surveillance Services or Equipment"</p> <p>We recommend NSF include these requirements in standard award terms and conditions, as well as in the PAPPG.</p>	The language already in addressed in the award terms and conditions. See, for example, the Research Terms and Conditions Appendix C.
20	University of Wisconsin-Madison	Non-Discrimination Statutes and Regulations	XI.A.1.b	XI-1	<p>Paragraph A.1.b reads: When NSF receives a complaint alleging discrimination under any of these statutes, NSF may refer the complaint to the grantee or another entity with authority or jurisdiction to investigate the complaint when the complaint does not meet NSF requirements for acceptance for investigation. In this instance, the grantee shall acknowledge receipt of the complaint referred by NSF to the grantee and inform NSF of the final disposition of the complaint.</p> <p>This paragraph may lead to confusion. First, it says that NSF may refer back to the grantee or another entity, but then the second sentence only refers to the grantee providing NSF with a final disposition. We suggest NSF clarify that the grantee is not responsible for providing any update if a complaint is referred to another entity. A small suggested edit is below.</p> <p>When NSF receives a complaint alleging discrimination under any of these statutes, NSF may refer the complaint to the grantee or another entity with authority or jurisdiction to investigate the complaint when the complaint does not meet NSF requirements for acceptance for investigation. In this instance, <i>when the complaint is referred to the grantee</i>, the grantee shall acknowledge receipt of the complaint referred by NSF and inform NSF of the final disposition of the complaint.</p>	Comment incorporated.