

| Number | Comment Source | Topic | PAPPG Reference(s) | PAPPG Page Numbers | Comment | NSF Response/Resolution |
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| 1 | Texas A&M University | SciENcv | II.D.1.e | II-7 | <p>For the last few proposals, I've used the SciENcv set-up and I find that they are actually quite convenient. However, I have submitted a couple of proposals that are collaborative and joint with a separate funding agency (see, for example: https://www.nsf.gov/pubs/2021/nsf21035/nsf21035.jsp). There is a huge amount of documentation that we are expected to provide for non-US investigators including Bios, C&Ps, and COA forms. I had to produce those on behalf of my collaborators because the Finnish folks do not have these materials ready to go for their own agencies, and they have their own bureaucratic red tape on their side to deal with (with their own forms, and formats, letters, budgets, budget justifications). And I have to say that the NSF Fillable Format saved me. It was the only way I could produce these materials for someone else without masquerading as them: I could use their data (in their forms) and turn them into something that research.gov would accept. If you'd removed that format, we likely would not have been able to submit.</p> <p>My experience with NSF proposals (submitted myself, reviewed, and in panels) over the years has been that there is a tendency toward homogenization. They seem to converge to the same, safe (and defensive) form. Little things like these forms matter a lot because they don't affect everything/everybody in the same way: in my experience most people fit the common case, but instituting a rule to force everyone to do so will hurt the outliers, the people on the tail of the distribution, and the slightly unique submissions. Those have unique or challenging constraints (like my example with the Finnish department)... and I've seen this with research.gov being stricter about some things: it got confused by how to set up someone not at the institution but for whom we needed a budget, for instance. These weird cases are probably only discovered in the system by trying to submit unusual variants. Constraints, such as forcing SciENcv, will have no real effect on the middle of the distribution (or my "normal" core program submissions), but it would be an impediment for the less conventional ones.</p> | <p>The use of SciENcv for the creation of NSF-required biographical sketch and current and pending support documents is a vast improvement for researchers over the static, NSF fillable formats. The benefits include:</p> <ul style="list-style-type: none"> - Pre-population of data: By linking accounts to ORCID, proposers may see a reduction in the administrative burden associated with preparing these sections of the proposal. - Ability to have multiple versions: Proposers can easily access multiple versions of the NSF-required documents and customize them to align with the requirements of a specific funding opportunity. - Ensures compliance with current NSF policy: Use of SciENcv ensures that proposers are using a compliant version of the biographical sketch and current and pending support documents. <p>In addition, the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Section 223(a)(1) (42 USC 6605(a)(1)) requires all senior personnel identified on a proposal submitted to NSF to certify that the information provided in their Biographical Sketch and Current and Pending Support documents are accurate, current, and complete. SciENcv has developed an electronic signature mechanism that will meet this statutory requirement and ensure NSF compliance with this requirement. Other agencies that use SciENcv also will use this mechanism to collect the requisite electronic signature.</p> <p>NSF does understand, however, that mandatory use of SciENcv will require organizations to train researchers to ensure implementation of this new requirement. To provide sufficient time for such training, NSF will be extending the implementation for THIS requirement in the 2023 PAPPG until October 2023. The specific date will be announced to the NSF proposer community when available.</p> |
| 2 | University of Washington | SciENcv | II.D.1.e | II-7 | <p>With regards to the use of SciENcv. The use of this separate website to produce Biographical sketches and current and Pending reports is an extra burden for scientists proposing to NSF. The required use of SciENcv is a solution looking for a problem. The previous methods worked just fine and most people knew how to use them while also following the rules for their submission. SciENcv is difficult to navigate because each item is entered separately without the ability to readily review the document holistically. In the PDF forms for C&P, you can enter the information and scroll down to see other information on the form. That PDF is elegant, simple and does not create an additional work burden on the individual submitting the proposal.</p> | <p>The use of SciENcv for the creation of NSF-required biographical sketch and current and pending support documents is a vast improvement for researchers over the static, NSF fillable formats. The benefits include:</p> <ul style="list-style-type: none"> - Pre-population of data: By linking accounts to ORCID, proposers may see a reduction in the administrative burden associated with preparing these sections of the proposal. - Ability to have multiple versions: Proposers can easily access multiple versions of the NSF-required documents and customize them to align with the requirements of a specific funding opportunity. - Ensures compliance with current NSF policy: Use of SciENcv ensures that proposers are using a compliant version of the biographical sketch and current and pending support documents. <p>In addition, the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Section 223(a)(1) (42 USC 6605(a)(1)) requires all senior personnel identified on a proposal submitted to NSF to certify that the information provided in their Biographical Sketch and Current and Pending Support documents are accurate, current, and complete. SciENcv has developed an electronic signature mechanism that will meet this statutory requirement and ensure NSF compliance with this requirement. Other agencies that use SciENcv also will use this mechanism to collect the requisite electronic signature.</p> <p>NSF does understand, however, that mandatory use of SciENcv will require organizations to train researchers to ensure implementation of this new requirement. To provide sufficient time for such training, NSF will be extending the implementation for THIS requirement in the 2023 PAPPG until October 2023. The specific date will be announced to the NSF proposer community when available.</p> |
| 3 | University of Washington | SciENcv | II.D.1.e | II-7 | <p>Originally Bio sketches could be created in a word processing program residing locally on a personal computer or online. In that case, you could see the whole document as you filled it in and thus could see each product in the context of others. Bio sketches change depending on proposals. By going to three pages in the last PAPPG, the burden to correctly format was lifted, but was required due to the difficulty and inefficiency associated with SciENcv. IN SciENcv you must add and subtract by clicking boxes and then look at the output. In reality, to do this efficiently you basically have to go to the old format in a word processor and then go through the painful forces in SciENcv and cross compare the two documents. Ultimately this is an additional burden on the individual filling in the form.</p> <p>My recollection is that neither form is directly added to your proposal so you must download the product and then upload it into the funding website (Fastlane, research.gov, ect.). So SciENcv creates extra steps, is harder to use, requires going to a secondary web site, and does not allow easy review of the product being produced. These are all extra burdens.</p> | <p>Proposers can easily access multiple versions of the NSF-required documents and customize them to align with the requirements of a specific funding opportunity.</p> |
| 4 | University of Washington | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.(ix) | II-29 | <p>The addition of the "Plan for safe and inclusive field/Aircraft Research (PSI-FVAR)" to the proposal is a very large burden on the project lead of the proposal. Unless reviewers and panels address this in their reviews, it would seem that this section should be filled out upon successful review of the proposal but prior to funding. The success for original NSF proposals is fairly poor (>25%) and likely much poorer for those proposing ship time. Individuals and teams proposing research will need to go to great lengths to fill in this form by addressing many, many requirements (Identifying and costing trainings and identifying several different plans; the list is extensive.) Why place this large burden on so many additional individuals when it section is not important until the project is to be recommended for funding? One thing not addressed in the PAPPG is whether additional funding will be granted to address this burden once funded. I understand the purpose of this section, but in the case of ships, UNOLS and the universities running the ships address many of these issues prior to the researchers stepping on board the ships and again just prior to the start of the cruise. Many of the things listed fall under the purview of the ship. To fill in this form, am I required to contact each acceptable ship and ask about their procedures and policies prior to getting funded? It just seems that the cart is way ahead of the horse on this section as it applies to NSF funded assets like UNOLS ships. I think that you need to consider the added burden to writing a proposal and whether it actually will be effective in accomplishing its goals. There is a better way to do this.</p> | <p>Plans for safe and inclusive fieldwork will be part of the review of all proposals with field research. The risks of harm from unsafe and non-inclusive conditions faced by field scientists are serious burdens which warrant the addition of the new supplemental document. If additional funding is needed to implement a PSI-FVAR this will be at the discretion of the program and should be discussed with the Cognizant Program Officer before submission of proposal. If aspects of the PSI-FVAR fall under the purview of another organization this would be noted in the plan.</p> |

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| 5 | North Dakota State College of Science | SciENcv | II.D.1.e | II-7 | <p>This new requirement for the Biographical Sketches to be completed through SciENcv will create an undue burden on applicants who are from smaller non-research institutions.</p> <p>As a community college, we have received TUES, ATE, and S-STEM awards. Our faculty are focused on instruction and student success. Our faculty do not have large research portfolios. While SciENcv may be a good tool for a researcher at a large research university who applies to multiple NSF programs and various programs from other federal agencies, SciENcv will be another hurdle for my faculty to overcome in applying for federal grants. SciENcv is not a tool that would be useful to our faculty members and having an ORCID ID would provide little to no benefit for our faculty. Our faculty are focused on teaching and supporting them in applying for federal grants is hard enough without creating an additional burden of them needing to maintain a SciENcv account with current biographical and award information.</p> <p>Our faculty that have been awarded NSF grants have almost exclusively applied for NSF grants and they do not have research portfolios. By being able to use the NSF fillable forms for bio-sketches and current and pending forms, our faculty are able to learn and use one application system. Forcing our faculty to learn and use another system to simply create a bio-sketch when a perfectly good NSF pdf fillable form exists is an undue burden on them.</p> | <p>The use of SciENcv for the creation of NSF-required biographical sketch and current and pending support documents is a vast improvement for researchers over the static, NSF fillable formats. The benefits include:</p> <ul style="list-style-type: none"> - Pre-population of data: By linking accounts to ORCID, proposers may see a reduction in the administrative burden associated with preparing these sections of the proposal. - Ability to have multiple versions: Proposers can easily access multiple versions of the NSF-required documents and customize them to align with the requirements of a specific funding opportunity. - Ensures compliance with current NSF policy: Use of SciENcv ensures that proposers are using a compliant version of the biographical sketch and current and pending support documents. <p>In addition, the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Section 223(a)(1) (42 USC 6605(a)(1)) requires all senior personnel identified on a proposal submitted to NSF to certify that the information provided in their Biographical Sketch and Current and Pending Support documents are accurate, current, and complete. SciENcv has developed an electronic signature mechanism that will meet this statutory requirement and ensure NSF compliance with this requirement. Other agencies that use SciENcv also will use this mechanism to collect the requisite electronic signature.</p> <p>NSF does understand, however, that mandatory use of SciENcv will require organizations to train researchers to ensure implementation of this new requirement. To provide sufficient time for such training, NSF will be extending the implementation for THIS requirement in the 2023 PAPPG until October 2023. The specific date will be announced to the NSF proposer community when available.</p> |
| 6 | Anonymous | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>I am concerned about the new document "Plan for Safe and Inclusive Field/Vessel/Aircraft Research" that will be required for any proposal including this type of work. I fully support the importance of safe and inclusive field work and am fully aware that this has been a problem for a variety of reasons. However I feel this is a misguided effort to make an impact, and there is a better alternative. Like the other supplemental documents that have become required (postdoc mentoring plan, data management plan, etc.) it could very well devolve into a box-checking operation where people copy and paste a template having written it once, or perhaps copying from somewhere else. No such document is required for the rest of the research effort taking place in the lab or the office, despite the clear fact that many troubling issues of harassment and inclusion take place there, too. As such, requiring this document creates the false impression that field work is where the problem is, which I do not believe to be the case. It is much more pervasive than that. Allow me to suggest an alternative: The responsible conduct in research training should be modified to include a discussion of how to stringently upholding safety and inclusion. That modification should include specific ways in which field work presents unique dangers. The lab environment also provides some unique dangers, too, which should also be included. The work to prepare an NSF proposal is already extraordinary, with a new "required document" or "standard template" appearing seemingly every year. I think it's important that these supplemental documents be restricted to those needed by reviewers to evaluate the proposal. It doesn't lessen the importance of safe and inclusive field work to say that it is not necessary for the reviewers to evaluate the proposal. As PIs almost always write more proposals than they win awards, this alternative course will reduce the administrative burden while at the same time having a more focused impact precisely at the stage it is needed. Moreover, it reaches not only the PI or proposal preparers, but anyone involved extensively in the awarded project. If this is already fully included in RCR training, then I would argue that the inclusion of this new document is not necessary and will have no impact, per my earlier comments.</p> | <p>Recent published literature makes clear that the field research environment is particularly challenging with respect to safety and inclusion. Organizations may develop resources that support their faculty to draft compelling PSI-FVARs. We see that as a positive. However, more so than laboratory work, field work varies in the specifics of the field location, project field activities themselves, personnel, and infrastructure. The PIs are the ones best equipped to propose the appropriate preparation for the field work proposed in the project. The NSF considers that the submission of two-page summary document of those preparations is not undue burden on PIs and together with the inclusion of the PSI-FVAR in the merit review process may contribute to more thoughtful approaches to all fieldwork, not just fieldwork supported by the NSF.</p> |
| 7 | University of Southern California | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>I applaud the NSF for the requirement for PIs to include a plan for fieldwork safety (the PSI-FVAR). As a PI who conducts field research I believe this is essential for conducting high quality, ethical research and I will gladly complete it in my future applications. It may be outside the scope of the present revision, but in the future I would love to see another amendment or addition asking PIs to also describe their plans for establishing relationships, involving local researchers, etc, to avoid parachute science when conducting research in foreign countries and/or on indigenous lands to.</p> | <p>Section 1 (Background Information) of the PSI-FVAR provides a few examples of potential challenges that the PI(s) should address, including the diversity of the local human community at the field location. Establishing positive relationships with local community members, whether on international, indigenous, or local sites, is a safety and inclusivity matter.</p> |
| 8 | University of Nevada, Reno | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>I applaud NSF for including a Plan for Safe and Inclusive Field/Vessel/Aircraft Research (PSI-FVAR) which appears on page II-29 on the revised PAPPG. I think the inclusion of the PSI-FVAR is an important step towards increasing justice and equity in STEM. I would like to suggest that the language in the PSI-FVAR be broadened to include any travel that is funded by a NSF grant. For example, many PIs request funds to attend academic conferences as part of a NSF grant. Based on my reading, the expectations to treat all personnel with respect and dignity and maintain an inclusive workplace that is outlined in PSI-FVAR for field work, does not explicitly include other travel (such as conference attendance). However, I am aware that academic conferences are (unfortunately) often a location where harassment occurs. I believe broadening the language in the PSI-FVAR to include conferences and other scholarly travel would further strengthen efforts to create a more equitable and just workplace. Thank you for considering my comment.</p> | <p>Travel to and from the field/vessel/aircraft site should be addressed as part of the PSI-FVAR. NSF concurs with your comments regarding conferences and implemented a requirement that applies to both conference and group travel awards which states that, "It is NSF policy (see Chapter XI.A.1.g.) to foster harassment-free environments wherever science is conducted, including at NSF-sponsored conferences. Proposers are required to have a 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 conference will be resolved. This policy or code-of-conduct must be disseminated to conference participants prior to attendance at the conference as well as made available at the conference itself. Proposers should not submit the policy or code-of-conduct to NSF for review.</p> |
| 9 | Anonymous | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>I am concerned about the new document "Plan for Safe and Inclusive Field/Vessel/Aircraft Research" that will be required for any proposal including this type of work. I fully support the importance of safe and inclusive field work and am fully aware that this has been a problem for a variety of reasons. However I feel this is a misguided effort to make an impact, and there is a better alternative. Like the other supplemental documents that have become required (postdoc mentoring plan, data management plan, etc.) it could very well devolve into a box-checking operation where people copy and paste a template having written it once, or perhaps copying from somewhere else. No such document is required for the rest of the research effort taking place in the lab or the office, despite the clear fact that many troubling issues of harassment and inclusion take place there, too. As such, requiring this document creates the false impression that field work is where the problem is, which I do not believe to be the case. It is much more pervasive than that. Allow me to suggest an alternative: The responsible conduct in research training should be modified to include a discussion of how to stringently upholding safety and inclusion. That modification should include specific ways in which field work presents unique dangers. The lab environment also provides some unique dangers, too, which should also be included. The work to prepare an NSF proposal is already extraordinary, with a new "required document" or "standard template" appearing seemingly every year. I think it's important that these supplemental documents be restricted to those needed by reviewers to evaluate the proposal. It doesn't lessen the importance of safe and inclusive field work to say that it is not necessary for the reviewers to evaluate the proposal. As PIs almost always write more proposals than they win awards, this alternative course will reduce the administrative burden while at the same time having a more focused impact precisely at the stage it is needed. Moreover, it reaches not only the PI or proposal preparers, but anyone involved extensively in the awarded project. If this is already fully included in RCR training, then I would argue that the inclusion of this new document is not necessary and will have no impact, per my earlier comments.</p> | <p>Recent published literature makes clear that the field research environment is particularly challenging with respect to safety and inclusion. Organizations may develop resources that support their faculty to draft compelling PSI-FVARs. We see that as a positive. However, more so than laboratory work, field work varies in the specifics of the field location, project field activities themselves, personnel, and infrastructure. The PIs are the ones best equipped to propose the appropriate preparation for the field work proposed in the project. The NSF considers that the submission of a two-page PSI-FVAR summary document of those preparations is not undue burden on PIs and together with the inclusion of the PSI-FVAR as part of the merit review process may contribute to more thoughtful approaches to all fieldwork, not just fieldwork supported by the NSF.</p> |
| 10 | Berkeley Lab | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>At the risk of blurring the categories too much, you should consider including travel for experimental work at user facilities in the "Plan for Safe and Inclusive Field/Vessel/Aircraft Research". Work at a synchrotron or other user facility often poses quite similar challenges as field trips (travel to unfamiliar environment, absence of support network at home, work is integral to the scientific project (whereas conference travel might be more optional), timing of travel is usually constrained to specific times, long hours and night shifts create the 'camp atmosphere' that can facilitate unsafe behavior, there is pressure to use a strictly limited time for collecting as much data as possible 'whatever it takes').</p> | <p>The definition of field research is off-site or off-campus research. If an organization defines work at another organization's facility such as a synchrotron as off-site, the proposer must include a PSI, upon the implementation of the 2023 PAPPG.</p> |

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| 11 | University Cooperation for Atmospheric Research | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | I support the addition of a plan for safe and inclusive field/vessel/aircraft research. | Thank you for your comment. |
| 12 | University National Oceanographic Laboratory System | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | The definition of field work to determine when a PSI-FVAR is required could be clarified as a combination of two or more of the following: 1 - requires lodging away from home 2 - environmental sample/data collection and the installation/removal of environmental sensors which return data to a lab. 3 - limited access to medical assistance a. inaccessible by standard ambulance b. medical support requires intervention and assistance from an institution 4 - limited access to private unfettered phone and data communications. | Thank you for your suggestions. NSF will be issuing a set of FAQs to further provide examples supporting the Foundation's definition of field research. |
| 13 | Susan Poulton | Biographical Sketch | II.D.2.h(i) | II-22 | Throughout my twenty-five-year career as a senior Digital Media Strategist who works alongside the science and technology community, I have been invited to participate in several NSF grant proposals in various capacities, from education and outreach to digital product strategy and development. As the NSF expands its grant opportunities to focus on innovation, the application and review process must offer a way to submit and make accomplishments of a non-academic nature available for review. For example, the current NSF Biosketch format has applicants list "Relevant Products"; however, only products the academic community can formally cite could be included. All of the accomplishments in my career that were highly applicable to the product at hand could not be included for review because they happened in the private or nonprofit sector. Also, the mechanisms by which "contractors" and "staff" are handled in budgeting and staffing do not allow for the potential that participants, even senior personnel and PIs, may be independent contractors for smaller organizations and not full-time staff at major institutions. This creates an inherent bias in grant participants. Not all accomplished individuals who can lead or contribute to projects are employed by major institutions. I applaud the efforts of the NSF to begin to target innovation and more agile solutions as the key to expanding science and research opportunities, including involving individuals from non-academic sectors. But the review and application process must change to match: less rigid, less paperwork, and more flexible solutions. If not, it is innovation in name only and not in practice. | The Biographical Sketch format has been updated to include additional product categories that may be more relevant to non-IHE proposers. |
| 14 | Consortium for Ocean Leadership | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>The proposed background and preparation sections of the PSI-FVAR, as outlined in the draft PAPPG, are clear and adhere to best practice recommendations. Completing this PSI-FVAR for proposal submission will ensure Principal Investigators clearly understand the unique circumstances of their proposed field environment, the field participants, and the required policies, processes, and training, for handling incidents in the field. We offer below a few suggestions to improve the PSI-FVAR requirement.</p> <p>First, the guidance calls for Principal Investigators to provide detail regarding the multiple organizations that will be involved in the project. These may not be specifically known at time of proposal. For example, within ocean science, projects using small fishing vessels, as opposed to vessels in the academic fleet, will require some flexibility in this regard. However, the Principal Investigator should include a strategy for how multi-institutional challenges will be handled, for example, how agreement on safety plans and processes will be reached in advance of field work and how to bring partners to the highest level of safety and inclusivity. A plan is only as good as the institution with the most lenient policies.</p> <p>The need for accountability could be stronger in the proposed outline. In PSI-FVAR section 2, Principal Investigators should identify those accountable for properly handling and reporting incidents in the field and for ensuring consequences for any individual found to have engaged in misconduct or unethical or disrespectful behavior per NSF's stated expectations. Will Principal Investigators be required to report on their success or lessons learned in funded project reports? How will NSF hold Principal Investigators (and others) accountable for following the PSI-FVAR? If these field safety and inclusivity plans are to be taken seriously, it will be critical that projects demonstrate adherence to their PSI-FVAR in the first annual progress report.</p> <p>Finally, we would ask if each of the NSF Directorates and Divisions that fund field research have developed their review criteria for these PSI-FVAR. These will be new to reviewers, and, thus, they will need resources for evaluating that a plan has been well thought out. The above referenced report includes a pre-expedition checklist focused on safety that can serve as a guide for both Principal Investigators and reviewers in developing and evaluating the PSI-FVAR. A version of this checklist, tailored for ocean (vessel-based) science is in development, which will be peer-reviewed and published on a timeline that aligns with the effective date of the revised PAPPG.</p> | <p>Responses to your comments are as follows:</p> <p>1) Agree that multi-organizational efforts have extra challenges and ask that such structures be listed within the submitted PSI. For all collaborative proposals a single PSI for all field research efforts should be provided with the lead submission. 2) For awards that include a PSI the PIs will be reporting on their PSI activities within each of their annual reports. 3) The NSF is developing internal training for PSI review, both for use in preparation of proposals as well as for annual reports. We will look to develop and support community development of resources for PSI review by external reviewers as well. We are aware of the existence of such checklists for various communities and will draw on those as well.</p> |
| 15 | Council on Governmental Relations (COGR) | Research.gov | I.A | I-1 | We applaud and congratulate NSF for its implementation of Research.gov, and the upcoming retirement of Fastlane.gov, which introduced so many people to electronic proposal submission more than 20 years ago! | Thank you for your comment. |
| 16 | Council on Governmental Relations (COGR) | BAAM | I.A | I-2 | <p>We understand that NSF plans to launch a new concept outline system, ProSPCT, because the functionality for collecting concept outlines before submission of a full proposal does not currently exist in Research.gov. On the other hand, NSF also proposes introducing a new submission portal – BAAM, which appears to duplicate functions that already exist in Research.gov and Grants.gov. Principal Investigators and research administrators must use dozens of unique federal grants management systems, which perform similar functions in different ways. This creates significant overhead for recipient institutions to learn, train on, use and maintain multiple grants management systems. It also introduces the potential for errors.</p> <p>COGR requests that NSF focus its resources and plans for new functionality in Research.gov and not duplicate functionality in BAAM. Given that BAAM appears to be aimed at helping new groups of institutions apply for funding, the research community may be able to benefit from any streamlining planned for these non-traditional recipients. Further, if concept outlines cannot be handled through Research.gov, then we urge NSF to design any new system with tight integration to Research.gov, including common navigation and look-and-feel, to reduce the learning curve by the community.</p> | NSF has started issuing broad agency announcements, or BAAs, as a new form of funding opportunity, which many other agencies currently use regularly. The BAA can be broad in its offering and NSF can choose to fund proposals as grants, cooperative agreements, contracts, or other arrangements; and each BAA will specify the award type. One goal of using BAAs, is to engage new communities of scientists and engineers, including those who may be working beyond institutions of higher education, such as in industry, nonprofits; state, local and tribal governments; civil society; and communities of practice and other organizations. NSF's use of BAAs supports the goal of broadening participation of smaller institutions and groups new to NSF. The Broad Agency Announcement Management site (BAAM) was designed to further the participation by using a streamlined application and submission system together to make it easier to apply to NSF, while reducing administrative burden on the applicant with a simple application process. It's intended to save time and effort up front before an award is issued by letting proposers focus more on developing their ideas and less on the nuts and bolts of applying. The BAAM system is not designed to replace Research.gov but provide another opportunity. |

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| 17 | Council on Governmental Relations (COGR) | Certifications Provided by the Organization | II.D.1.d | II-5 | <p>Under the new requirements, institutions must certify the “accuracy and completeness of the statements contained in the proposal.” While this is not a change, there are significant new consequences related to errors in disclosing Current and Pending Support (page II-2). Under #2 of the definition of Senior Personnel (page II-62), the PAPPG states, “Faculty Associate (faculty member) (or equivalent) -- an individual other than the Principal Investigator(s) considered by the performing institution to be a member of its faculty (or equivalent) or who holds an appointment as a faculty member at another institution, and who will participate in the project being supported.”</p> <p>This means that applicant organizations are responsible for certifying the accuracy of the information in Senior Personnel that are not employed by the applicant institution and where there is no way to verify the accuracy of the information.</p> <p>COGR asks NSF to address this issue, and we offer some options: (1) Consider updating the definition of Senior Personnel, #2 to remove individuals with unpaid courtesy or collaboration appointments at the applicant institution (e.g., retired faculty, consultants, or employees of other organizations) as Senior Personnel. (2) Consider updating the definition of Senior Personnel, #2 to allow institutions to rely on a commitment letter or other means rather than their own certifications for non-recipient personnel. For example, can NSF rely on a general statement that the subrecipient or consultant will comply with the PAPPG requirements as indicated in a required proposal commitment letter/or another signature process? (3) Consider a new #3 addressing those un-funded collaborators as something other than Senior Personnel for purposes of disclosure/certification.</p> | Thank you for your comment. Given that this would constitute a policy change, it would require more internal and external communication, including posting in the Federal Register for public comment, prior to implementation. |
| 18 | Council on Governmental Relations (COGR) | Biographical Sketch | II.D.2.h(i) | II-23 | We appreciate the revision in the section to report only “current” positions instead of “all positions,” as stated in the current policy. This is very helpful regarding both space limitations on the biosketch and harmonization with the NIH policy. | Thank you for your comment. Please note that this requirements only relates to professional appointments, and does not apply to academic or institutional appointments. |
| 19 | Council on Governmental Relations (COGR) | SciENcv | II.D.2.h(ii) | II-24-26 | <p>The new requirement that applicants use SciENcv to submit their Current and Pending Support will be challenging under the proposed timeline. While the system has been available for some time, recipient institutions, especially smaller institutions, may need more time to implement new processes. Member institutions state that investigators are responsible for manually updating in SciENcv, and they will continue to have this responsibility unless and until they can develop a system solution. For example, unless an institution has the expertise and has invested the time and resources to build an interface between their grants management system and SciENcv, all federal foundation, industry, and other sponsored award information needed for Current and Pending Support must be entered and maintained manually in SciENcv. Further, internal grants are not always captured in the same grants management system as sponsored awards. Therefore, a system-to-system solution may not be available in the short term. In addition, in-kind support is relatively new and captured at institutions using various methods. It’s unclear whether any system-to-system interface is possible in the short term. These factors are examples of the significant additional burden required to keep Current and Pending Support information upto-date in SciENcv.</p> <p>We must again express how challenging these new system implementations are for smaller institutions. The burden is very heavy for institutions that don’t have the range and number of employees focused on research that larger institutions have. Each new federal requirement must often be implemented by the same few people, which takes resources and support away from the researchers.</p> <p>We appreciate that NSF has selected ORCID IDs as a unique persistent identifier. ORCID IDs are becoming more common and are valuable when linking an individual to publications, patents, data sets, and other research products. Still, ORCID IDs are not widely used to connect federally funded awards to a particular individual. Therefore, this will not ease the administrative burden for awards in the short term. Nonetheless, we hope broader use of ORCID IDs will enable efficiencies in the future</p> <p>COGR requests that NSF delay the requirement to use SciENcv exclusively to develop and submit Current and Pending Support for an additional 12 months to provide time for NSF to make further refinements and for recipient institutions to build efficient processes and interfaces to support Current and Pending Support disclosures through SciENcv.</p> | <p>The use of SciENcv for the creation of NSF-required biographical sketch and current and pending support documents is a vast improvement for researchers over the static, NSF fillable formats. The benefits include:</p> <ul style="list-style-type: none"> - Pre-population of data: By linking accounts to ORCID, proposers may see a reduction in the administrative burden associated with preparing these sections of the proposal. - Ability to have multiple versions: Proposers can easily access multiple versions of the NSF-required documents and customize them to align with the requirements of a specific funding opportunity. - Ensures compliance with current NSF policy: Use of SciENcv ensures that proposers are using a compliant version of the biographical sketch and current and pending support documents. <p>In addition, the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Section 223(a)(1) (42 USC 6605(a)(1)) requires all senior personnel identified on a proposal submitted to NSF to certify that the information provided in their Biographical Sketch and Current and Pending Support documents are accurate, current, and complete. SciENcv has developed an electronic signature mechanism that will meet this statutory requirement and ensure NSF compliance with this requirement. Other agencies that use SciENcv also will use this mechanism to collect the requisite electronic signature.</p> <p>NSF does understand, however, that mandatory use of SciENcv will require organizations to train researchers to ensure implementation of this new requirement. To provide sufficient time for such training, NSF will be extending the implementation for THIS requirement in the 2023 PAPPG until October 2023. The specific date will be announced to the NSF proposer community when available.</p> |
| 20 | Council on Governmental Relations (COGR) | SciENcv | II.D.2.h(ii) | II-24-26 | <p>(g) Resubmission of current and pending support before award – We understand the need for NSF to assess budgetary and scientific overlap before award. However, we see this as an NSF business review and unrelated to scientific peer review of the application. This raises questions about why this information is needed at the time of proposal since the data is often stale within a few months of proposal submission.</p> <p>COGR requests removing the requirement in section (b) above to submit Current and Pending Support at the time of proposal. Submission should be delayed until the project is selected for funding, as described in section (g). This change will significantly reduce the administrative burden on PIs since only about 28% of proposals are selected for funding. This approach is also consistent with the current NIH process.</p> | NSF has thoughtfully considered the issue of use of just-in-time for submission of the current and pending support information, and, will be implementing such an approach in the 2024 version of the PAPPG. |
| 21 | Council on Governmental Relations (COGR) | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | We appreciate the inclusion of this new section to require training and other precautions to protect the safety of researchers working in the field where there may be an increased likelihood of harassment. We agree with NSF’s expectations and the responsibility of the researchers as described in sections. However, the community could benefit from some additional examples and resources related to the Preparation for Fieldwork, training, Field Incident Support, and other areas of the plan which may not already exist. Additional resources would significantly benefit smaller research institutions that wish to compete with larger research institutions for fieldwork sites. | It is NSF’s intention to develop and post FAQs for the preparation of the PSI-FVAR. NSF believes that these FAQs will assist the community in further understanding of the PAPPG language. |
| 22 | Council on Governmental Relations (COGR) | Human Subjects | II.D.5 | II-35 | We appreciate the recognition that a sponsored award may commence well before the research team requests human participant research approvals. NSF has included several similar enhancements to policy in this version of the PAPPG, which align better with current research methods and processes. We appreciate these changes. | Thank you for your comment. |

| Number | Comment Source | Topic | PAPPG Reference(s) | PAPPG Page Numbers | Comment | NSF Response/Resolution |
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| 23 | NCAR | Certifications Provided by Senior Personnel | II.D.1.e | II-7 | <p>"In accordance with the FY 2021, National Defense Authorization Act (NDAA), Section 223, senior personnel are required to certify in SciENcv that the information provided in their Biographical Sketch and Current and Pending Support documents are accurate, current, and complete. Senior personnel are required to update their Current and Pending Support disclosures prior to award, and at any subsequent time the agency determines appropriate during the term of the award."</p> <p>Please provide clarification on the proposed process of PI Certification prior to proposal submission. We recommend outlining the process within the PAPPG guidance for clarity for all applicant parties including AOR, PI, Co-PI, administrators, etc.</p> <p>(1) Is the certification visible on the PDF downloaded version from SciENcv? (2) Is the certification hard-coded into the document upon download and recognized upon upload into Research.gov? Thus, does an error occur in Research.gov if the certification is not valid? (3) Is it possible for PI CV/C&P certification to occur as part of the standard submission process in Research.gov/Grants.gov rather than as a separate process within SciENcv? (4) How does the certification process work when organizational delegates are assembling Senior Personnel documentation? (5) Does SciENcv allow PDF download of un-certified CV's and C&P's? (6) Is the certification required on CV and C&P documents that are copied from 'existing sources' in the platform? Will the copy feature still be available in SciENcv?</p> | <p>Responses to your comments are as follows: (1) Yes, the certification will be visible on the PDF download. (2) Yes, metadata in the downloaded document will indicate to Research.gov if the document is valid. (3) It is not possible to include the certification in Research.gov as only Authorized Organizational Representatives have signing authority in Research.gov. Given the SciENcv will be the system used by senior personnel to develop and upload the Biographical Sketch and Current and Pending Support, it is appropriate for the certification requirement to be implemented in this system. (4) Other Authorized Users will continue to be able to use SciENcv; they will not however, be able to download the document and provide the requisite certification (5) No, SciENcv will require acknowledgement of the required certification prior to download. (6) SciENcv will enforce the PAPPG requirement on all documents including those that are existing prior to the implementation.</p> |
| 24 | NCAR | Current and Pending Support | II.D.2.h(ii) | II-25-26 | <p>"Except where specifically noted as non-reportable in the NSPM-33 Implementation Guidance section on "Disclosure Requirements and Standardization," as well as Table 2a on "Guidance for disclosure of personal and professional information within R&D award application processes, current and pending support includes all resources (both foreign and domestic) made available to an individual in support of and/or related to all of the individual's research endeavors, regardless of whether or not they have monetary value, except as noted in paragraph (v) below. Current and pending support also includes in-kind contributions (such as office/laboratory space, equipment, supplies, employees, students). In-kind contributions not intended for use on the project/proposal being proposed that have associated time commitments also must be reported."</p> <p>NCAR is a NSF Federally Funded Research and Development Center (FFRDC) sponsored by NSF within GEO/AGS. We appreciate clarification on how In-kind contributions are reflected by FFRDC applicants like NCAR. This may or may not include office/laboratory space, equipment, co-sponsored time effort, etc.</p> <p>There are occurrences when NCAR NSF base-funded PI's apply to an NSF solicitation and co-sponsor time on the proposed project. Currently, our interpretation of the PAPPG Guidance and Pre and Post Award Disclosures Table of is that an entry will be listed in the Project/Proposal section under "Current or Pending" (not categorized under In-kind), and the entry will be filled out in its entirety, listing the co-sponsored person months per year as that time is being committed to the project, though not necessarily funded through the proposal. The co-sponsored time effort will also be captured in the Facilities, Equipment and Other Resources Document if the effort is for the proposed project. Please confirm our understanding is correct.</p> | <p>Given the specificity to an existing award, NSF will discuss these questions with NCAR.</p> |
| | NCAR | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>"Each proposal that proposes to conduct research in the field, including on vessels and aircraft, must upload, under "PSI-FVAR" in the supplementary documentation section of Research.gov, a plan that includes the elements specified below. There is a two-page limitation on the PSI-FVAR. No embedded links may be included within the two-page document. If multiple field research excursions (inclusive of multiple visits and/or sites) are proposed, only a single overarching PSI-FVAR must be submitted. If a required section within the PSI-FVAR is not applicable, the proposer should specify that the section is not applicable."</p> <p>NCAR is supportive of this additional requirement. There have been several recent project PI teams that have worked diligently to initiate and normalize this practice, including having associated studies that have demonstrated the value of bystander intervention training, in particular for field work. Would NSF consider requiring a Safety and Inclusion plan for all future field study proposals?</p> <p>NCAR expects that the plan will be submitted by the PI with each proposal in response to NSF's solicitation "Facility and Instrumentation Request Process (FIRP) 21-611" Will the facility provider, such as NCAR/EOL, also be required to provide a separate plan? Or is the plan provided by the PI sufficient for the field campaign? Or is it expected that facility providers will have a standard plan that applies to all field campaigns supported by the provider?</p> | <p>Responses to your comments are as follows: 1) The 2-page PSI-FVAR was specifically chosen to reduce the burden on PIs and is intended to signal that the PSI is a high level overview document rather than the complete guidance that will be provided to participants in the field work. Thus, it should be an overview of key plan elements without reliance on outside links. 2) The second portion of your comment agrees entirely with the NSF perspective; the PSI-FVAR will be a required document for all future proposals involving field/vessel/aircraft research. 3) Yes, such facilities will be required to have their own overarching plan related to their infrastructure and operations; this will not be completely redundant with the plans submitted by PIs intending to use the facility.</p> |
| 1 | Los Alamos National Laboratory | Publication/Distribution of Award Materials | XI.E | XI-19 | | <p>NSF's publication language already permits a wide variety of costs to be charged under this cost category. See draft PAPPG Chapter II.D.2.f(vi)(b).</p> |
| 2 | Anonymous | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>I am concerned about the new document "Plan for Safe and Inclusive Field/Vessel/Aircraft Research" that will be required for any proposal including this type of work. I fully support the importance of safe and inclusive field work and am fully aware that this has been a problem for a variety of reasons. However I feel this is a misguided effort to make an impact, and there is a better alternative. Like the other supplemental documents that have become required (postdoc mentoring plan, data management plan, etc) it could very well devolve into a box-checking operation where people copy and paste a template having written it once, or perhaps copying from somewhere else. No such document is required for the rest of the research effort taking place in the lab or the office, despite the clear fact that many troubling issues of harassment and inclusion take place there, too. As such, requiring this document creates the false impression that field work is where the problem is, which I do not believe to be the case. It is much more pervasive than that.</p> <p>Allow me to suggest an alternative: The responsible conduct in research training should be modified to include a discussion of how to stringently upholding safety and inclusion. That modification should include specific ways in which field work presents unique dangers. The lab environment also provides some unique dangers, too, which should also be included. The work to prepare an NSF proposal is already extraordinary, with a new "required document" or "standard template" appearing seemingly every year. I think it's important that these supplemental documents be restricted to those needed by reviewers to evaluate the proposal. It doesn't lessen the importance of safe and inclusive field work to say that it is not necessary for the reviewers to evaluate the proposal. As PIs almost always write more proposals than they win awards, this alternative course will reduce the administrative burden while at the same time having a more focused impact precisely at the stage it is needed. Moreover, it reaches not only the PI or proposal preparers, but anyone involved extensively in the awarded project. If this is already fully included in RCR training, then I would argue that the inclusion of this new document is not necessary and will have no impact, per my earlier comments.</p> | <p>Recent published literature makes clear that the field research environment is particularly challenging with respect to safety and inclusion. Organizations may develop resources that support their faculty to draft compelling PSI-FVARs. We see that as a positive. However, more so than laboratory work, field work varies in the specifics of the field location, project field activities themselves, personnel, and infrastructure. The PIs are the ones best equipped to propose the appropriate preparation for the field work proposed in the project. The NSF considers that the submission of a 2-page summary document of those preparations is not undue burden on PIs and together with the inclusion of the PSI-FVAR as part of the merit review process may contribute to more thoughtful approaches to all fieldwork, not just fieldwork supported by the NSF.</p> |

| Number | Comment Source | Topic | PAPPG Reference(s) | PAPPG Page Numbers | Comment | NSF Response/Resolution |
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| 3 | USC | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | I applaud the NSF for the requirement for PIs to include a plan for fieldwork safety (the PSI-FVAR). As a PI who conducts field research I believe this is essential for conducting high quality, ethical research and I will gladly complete it in my future applications. It may be outside the scope of the present revision, but in the future I would love to see another amendment or addition asking PIs to also describe their plans for establishing relationships, involving local researchers, etc, to avoid parachute science when conducting research in foreign countries and/or on indigenous lands to. | Section 1 (Background Information) of the PSI-FVAR provides a few examples of potential challenges that the PI(s) should address, including the diversity of the local human community at the field location. Establishing positive relationships with local community members, whether on international, indigenous, or local sites, is a safety and inclusivity matter. |
| 4 | Anonymous | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | I am concerned about the new document "Plan for Safe and Inclusive Field/Vessel/Aircraft Research" that will be required for any proposal including this type of work. I fully support the importance of safe and inclusive field work and am fully aware that this has been a problem for a variety of reasons. However I feel this is a misguided effort to make an impact, and there is a better alternative. Like the other supplemental documents that have become required (postdoc mentoring plan, data management plan, etc) it could very well devolve into a box-checking operation where people copy and paste a template having written it once, or perhaps copying from somewhere else. No such document is required for the rest of the research effort taking place in the lab or the office, despite the clear fact that many troubling issues of harassment and inclusion take place there, too. As such, requiring this document creates the false impression that field work is where the problem is, which I do not believe to be the case. It is much more pervasive than that. Allow me to suggest an alternative: The responsible conduct in research training should be modified to include a discussion of how to stringently upholding safety and inclusion. That modification should include specific ways in which field work presents unique dangers. The lab environment also provides some unique dangers, too, which should also be included. The work to prepare an NSF proposal is already extraordinary, with a new "required document" or "standard template" appearing seemingly every year. I think it's important that these supplemental documents be restricted to those needed by reviewers to evaluate the proposal. It doesn't lessen the importance of safe and inclusive field work to say that it is not necessary for the reviewers to evaluate the proposal. As PIs almost always write more proposals than they win awards, this alternative course will reduce the administrative burden while at the same time having a more focused impact precisely at the stage it is needed. Moreover, it reaches not only the PI or proposal preparers, but anyone involved extensively in the awarded project. If this is already fully included in RCR training, then I would argue that the inclusion of this new document is not necessary and will have no impact, per my earlier comments. | Recent published literature makes clear that the field research environment is particularly challenging with respect to safety and inclusion. Organizations may develop resources that support their faculty to draft compelling PSI-FVARs. We see that as a positive. However, more so than laboratory work, field work varies in the specifics of the field location, project field activities themselves, personnel, and infrastructure. The PIs are the ones best equipped to propose the appropriate preparation for the field work proposed in the project. The NSF considers that the submission of a 2-page summary document of those preparations is not undue burden on PIs and together with the inclusion of the PSI-FVAR in the merit review process may contribute to more thoughtful approaches to all fieldwork, not just fieldwork supported by the NSF. |
| 5 | Christin Buechner | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | At the risk of blurring the categories too much, you should consider including travel for experimental work at user facilities in the "Plan for Safe and Inclusive Field/Vessel/Aircraft Research". Work at a synchrotron or other user facility often poses quite similar challenges as field trips (travel to unfamiliar environment, absence of support network at home, work is integral to the scientific project (whereas conference travel might be more optional), timing of travel is usually constrained to specific times, long hours and night shifts create the 'camp atmosphere' that can facilitate unsafe behavior, there is pressure to use a strictly limited time for collecting as much data as possible 'whatever it takes'). | The definition of field research is off-site or off-campus research. If an organization defines work at another organization's facility such as a synchrotron as off-site, the proposer must include the PSI upon implementation of the 2023 PAPPG. |
| 6 | Anonymous | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | I support the addition of a plan for safe and inclusive field/vessel/aircraft research. | Thank you for your comment. |
| 7 | UNOLS | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | The definition of field work to determine when a PSI-FVAR is required could be clarified as a combination of two or more of the following: 1 - requires lodging away from home 2 - environmental sample/data collection and the installation/removal of environmental sensors which return data to a lab. 3 - limited access to medical assistance a. inaccessible by standard ambulance b. medical support requires intervention and assistance from an institution 4 - limited access to private unfettered phone and data communications. | Thank you for your suggestions. The NSF will be issuing a set of FAQs to further provide examples supporting the NSF-developed definition of field research. |
| 8 | Jodi Ost | SciENcv | II.D.1.e | II-7 | This new requirement for the Biographical Sketches to be completed through SciENcv will create an undue burden on applicants who are from smaller non-research institutions. As a community college, we have received TUES, ATE, and S-STEM awards. Our faculty are focused on instruction and student success. Our faculty do not have large research portfolios. While SciENcv may be a good tool for a researcher at a large research university who applies to multiple NSF programs and various programs from other federal agencies, SciENcv will be another hurdle for my faculty to overcome in applying for federal grants. SciENcv is not a tool that would be useful to our faculty members and having an ORCID ID would provide little to no benefit for our faculty. Our faculty are focused on teaching and supporting them in applying for federal grants is hard enough without creating an additional burden of them needing to maintain a SciENcv account with current biographical and award information. Our faculty that have been awarded NSF grants have almost exclusively applied for NSF grants and they do not have research portfolios. By being able to use the NSF fillable forms for bio-sketches and current and pending forms, our faculty are able to learn and use one application system. Forcing our faculty to learn and use another system to simply create a bio-sketch when a perfectly good NSF pdf fillable form exists is an undue burden on them. | The use of SciENcv for the creation of NSF-required biographical sketch and current and pending support documents is a vast improvement for researchers over the static, NSF fillable formats. The benefits include: - Pre-population of data: By linking accounts to ORCID, proposers may see a reduction in the administrative burden associated with preparing these sections of the proposal. - Ability to have multiple versions: Proposers can easily access multiple versions of the NSF-required documents and customize them to align with the requirements of a specific funding opportunity. - Ensures compliance with current NSF policy: Use of SciENcv ensures that proposers are using a compliant version of the biographical sketch and current and pending support documents. In addition, the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Section 223(a)(1) (42 USC 6605(a)(1)) requires all senior personnel identified on a proposal submitted to NSF to certify that the information provided in their Biographical Sketch and Current and Pending Support documents are accurate, current, and complete. SciENcv has developed an electronic signature mechanism that will meet this statutory requirement and ensure NSF compliance with this requirement. Other agencies that use SciENcv also will use this mechanism to collect the requisite electronic signature. NSF does understand, however, that mandatory use of SciENcv will require organizations to train researchers to ensure implementation of this new requirement. To provide sufficient time for such training, NSF will be extending the implementation for THIS requirement in the 2023 PAPPG until October 2023. The specific date will be announced to the NSF proposer community when available. |
| 9 | University of Chicago | Current and Pending Support | II.D.2.h(ii) | II-25-26 | | The NSTC Research Subcommittee Disclosure Policy Working Group is currently working on harmonized templates for use in submission of the biographical sketch and current and pending support. |
| 10 | Oregon State | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | In reference to PSI-FVAR, there is a concern with only allowing up to two pages for a Plan as a supplementary document without allowing for embedded links. Often times projects are relying off of institutional policy and procedures as part of their Plans. Institutional policies and procedures are subject to change at any time, which is why institutions often recommend the use of embedded links. Additionally, there are a lot of proposed required sections that could fill out a page by themselves, such as a Field Incident Support Plan. If there is a page limit to this supplementary document along with the prohibition of embedded links, there is a strong likelihood that funding agencies will be receiving limited and inaccurate Safety Plans from proposers. | A limitation of 2-page for the PSI-FVAR was specifically chosen to reduce the burden on PIs and is intended to signal that the PSI is a high level overview document rather than the complete guidance that will be provided to participants in the field work. Thus, it should be an overview of key plan elements without reliance on outside links. |
| 11 | Oberlin University | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | I like the new PSI/FVAR section but wish that there were something about travel to labs to conduct work or to conferences. These are still potentially challenging situations with many power dynamics at play and it would be helpful to have these considerations for ALL travel rather than just for field work. | NSF concurs with your comments regarding conference attendance and implemented a requirement that applies to both conference and group travel awards which states that, "It is NSF policy (see Chapter XI.A.1.g.) to foster harassment-free environments wherever science is conducted, including at NSF-sponsored conferences. Proposers are required to have a 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 conference will be resolved. This policy or code-of-conduct must be disseminated to conference participants prior to attendance at the conference as well as made available at the conference itself. Proposers should not submit are not required to submit the policy or code-of-conduct to NSF for review. Preliminary results from evaluation of this approach have been positive. |

| Number | Comment Source | Topic | PAPPG Reference(s) | PAPPG Page Numbers | Comment | NSF Response/Resolution |
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| 12 | Anonymous | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>In regards to the new requirement for a supplemental document (PSI-FVAR): There is no doubt that NSF is simply attempting to further ensure that research is done in a harassment-free environment. I can only speak for women, but there are many in my generation of female scientists that wish they had been able to conduct their research in such an environment. For this, I commend NSF in taking further steps to help foster a better research environment.</p> <p>However, I am not sure that additional paperwork at the time of proposal submission is in any way helpful. Instead, it seems an unfair and undue burden on the part of the proposing PI, who may or may not be awarded funding, as well as your reviewers who will have additional documents to review. Is this document going to truly be factored into whether or not a project is awarded funding? How will NSF follow up on the plans put forward? Inclusiveness starts at "home", and many universities already require trainings for students and faculty. In some ways, this document either requires PIs to reiterate that those trainings exist or to factor further funding into their proposals to pay for additional training. NSF is better served by requiring this documentation (and a more thoughtful planning process) of those they actually award funding to. A best practice proposal: NSF can bring together each fiscal year's new PIs for a day-long, in-person training. Then, on a second day, the PIs can compile and describe an appropriate plan which can be reviewed by the other PIs at the gathering. This may actually help make meaningful and true change, moving fieldwork towards a harassment free environment.</p> | <p>NSF concurs with the importance of providing an inclusive environment for research, especially in the field. The two-page limit on the document is designed to reduce the burden to an appropriate level. The PSI-FVAR will be reviewed as an integral part of the proposal, and will be reviewed under intellectual merit or broader impacts, or both, as appropriate for what is being proposed. For awards with field research, awardees will be expected to report on their PSI efforts in annual reports. It is also envisioned that activities at individual organizations will be helpful to inform PSI development. The NSF will also look to provide and develop additional resources. The breadth of field research that NSF supports is extensive and prohibits a single field training approach however the NSF is interested in hearing from communities of researchers that might wish to develop such activities in support of meaningful change.</p> |
| 13 | Bigelow Laboratory for Ocean Sciences | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>Overall, I agree that the proposed change to require this documentation is necessary for the performance of the functions of the agency and will have practical utility, and I believe it will enhance the quality, utility, and clarity of the information from respondents. Below I offer four specific recommendations that may further clarify the utility of this new supplemental document.</p> <p>Recommendation #1: Please clarify the definition of "in the field" on page II-29 (Chapter II Section D 2 i xi) where details are provided about what is required in the supplemental document. A definition for "research in the field" is defined on page II-10 as "data/information/samples being collected off-campus or off-site". Please bring this same definition to page II-29, to again emphasize that fieldwork means any data collection done off-site, even if just a relatively small sampling done by a small team in a remote location.</p> <p>Recommendation #2: Consider including in the guidance for the PSI-FVAR that proponents could include assessment mechanism(s) on the effectiveness of implementation of the PSI-FVAR.</p> <p>Recommendation #3: Consider including in the PAPPG guidance for the PSI-FVAR that proponents could document implementation of the PSI-FVAR in project annual reports.</p> <p>Recommendation #4: Consider including in the guidance what the specific review criteria will be for the new PSI-FVAR supplemental document.</p> | <p>Field research is defined as data/information/samples being collected off-campus or off-site, and this definition is now repeated, as recommended. Outreach to the community on NSF's expectations will be done through published FAQs, webinars, and other mechanisms.</p> |
| 14 | Anonymous | SciENcv | II.D.2.h(ii) | II-24-26 | <p>The NSF should continue to support the fillable PDF forms for the biosketches and current & pending. SciENcv has had a number of issues with downtime in the past which made it inaccessible for hours at a time. Other problems made it difficult to use (e.g., formatting issues of text imported from other sources), and the helpdesk would take weeks to resolve those issues. Other federal sponsors (e.g. NIH) offer more than one method for the preparation of these documents. The NIH uses SciENcv as well as Word/PDF formats for the preparation of biosketches and the current & pending (Other Support) document. To lessen the administrative burden more than one method should be made available to the research community for the preparation of these documents.</p> | <p>The use of SciENcv for the creation of NSF-required biographical sketch and current and pending support documents is a vast improvement for researchers over the static, NSF fillable formats. The benefits include:</p> <ul style="list-style-type: none"> - Pre-population of data: By linking accounts to ORCID, proposers may see a reduction in the administrative burden associated with preparing these sections of the proposal. - Ability to have multiple versions: Proposers can easily access multiple versions of the NSF-required documents and customize them to align with the requirements of a specific funding opportunity. - Ensures compliance with current NSF policy: Use of SciENcv ensures that proposers are using a compliant version of the biographical sketch and current and pending support documents. <p>In addition, the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Section 223(a)(1) (42 USC 6605(a)(1)) requires all senior personnel identified on a proposal submitted to NSF to certify that the information provided in their Biographical Sketch and Current and Pending Support documents are accurate, current, and complete. SciENcv has developed an electronic signature mechanism that will meet this statutory requirement and ensure NSF compliance with this requirement. Other agencies that use SciENcv also will use this mechanism to collect the requisite electronic signature.</p> <p>NSF does understand, however, that mandatory use of SciENcv will require organizations to train researchers to ensure implementation of this new requirement. To provide sufficient time for such training, NSF will be extending the implementation for THIS requirement in the 2023 PAPPG until October 2023. The specific date will be announced to the NSF proposer community when available.</p> |
| 15 | University of Texas | SciENcv | II.D.2.h(ii) | II-24-26 | <p>I am writing to express my concern about the requirement that SciENcv be used for Current & Pending Support documents. As a departmental research administrator who assists with proposal compliance and submission, I have found the adoption of SciENcv to be slow for biosketches and worse for current and pending documents. Nearly all of the researchers at our institute use the NSF fillable template, which will no longer be permitted for proposal submissions. I would ask NSF to reconsider its decision and to allow the NSF fillable template to continue to be used.</p> | <p>The use of SciENcv for the creation of NSF-required biographical sketch and current and pending support documents is a vast improvement for researchers over the static, NSF fillable formats. The benefits include:</p> <ul style="list-style-type: none"> - Pre-population of data: By linking accounts to ORCID, proposers may see a reduction in the administrative burden associated with preparing these sections of the proposal. - Ability to have multiple versions: Proposers can easily access multiple versions of the NSF-required documents and customize them to align with the requirements of a specific funding opportunity. - Ensures compliance with current NSF policy: Use of SciENcv ensures that proposers are using a compliant version of the biographical sketch and current and pending support documents. <p>In addition, the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Section 223(a)(1) (42 USC 6605(a)(1)) requires all senior personnel identified on a proposal submitted to NSF to certify that the information provided in their Biographical Sketch and Current and Pending Support documents are accurate, current, and complete. SciENcv has developed an electronic signature mechanism that will meet this statutory requirement and ensure NSF compliance with this requirement. Other agencies that use SciENcv also will use this mechanism to collect the requisite electronic signature.</p> <p>NSF does understand, however, that mandatory use of SciENcv will require organizations to train researchers to ensure implementation of this new requirement. To provide sufficient time for such training, NSF will be extending the implementation for THIS requirement in the 2023 PAPPG until October 2023. The specific date will be announced to the NSF proposer community when available.</p> |

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| 16 | Cornell | Publication/Distribution of Award Materials | XI.E | XI-19 | Because NSF "advocates and encourages" open scientific communication, we request that the policy guide explicitly allow financial support for open access repositories, including voluntary contributions, to be charged against NSF awards. In the current document, the guidance regarding open access fees is contradictory. On page XI-19 (E.1. and E.2.), the document states: "NSF advocates and encourages open scientific and engineering communication..." and "Cost of documenting, preparing, publishing, disseminating, and sharing research findings and supporting material are allowable charges against the award." However, costs related to "prior or early publication" are explicitly prohibited on page II-17 (vi.b.) in the draft, and this alludes to the open access preprints that many researchers find so valuable. Rapid scientific communication fosters innovation. At arXiv, we regularly hear researchers say that arXiv's open access research sharing platform is absolutely essential for their work. Many researchers also tell us that they would like to donate to arXiv as part of their open access "publishing" fees because they deposit their conference proceedings and peer reviewed work here for global dissemination. And yet they find there is no mechanism to use NSF grant funding to make such a contribution, even though fees to commercial publishers and cloud providers are allowed. Plus, as an open access platform free for researchers to submit their work, arXiv charges no official fee for researchers to use arXiv. If NSF is willing to financially support the open access infrastructure necessary to facilitate open scientific communication, we request that this be made clear in the policy document. Specifically, we propose that modest contributions to well-established open access repositories such as arXiv.org should be allowable charges against NSF awards. Thank you for your consideration. | NSF's current coverage on the publication/documentation/dissemination cost category is very flexible with regard to the types of costs that may be charged. However, costs related to prior or early publication present challenges with regard to allocability, and as such, it is not NSF's intention to expand the coverage in this area. |
| 17 | Cary Institute of Ecosystem Studies | II.D.2.f(vi)(e) | Subawards | II-19 | On page II-19, second paragraph, a reference is made regarding additional requirements for issuing subawards or consultant arrangements to foreign organizations. It points the reader to Chapter 1, E.6. However, this section is for Unaffiliated Individuals. I believe the reference should correspond to Chapter I.E.7. for Foreign Organizations. | Thank you for your comment. |
| 18 | Cary Institute of Ecosystem Studies | Concept Outlines | I.D.1 | I-3 | A Concept Outline may be submitted at any time by a PI but does this apply only to the specified proposal types (RAPID, EAGER, etc.)? In logging in to the ProSPCT tool, it looks like the PI would have the ability to check "Other Proposal." As such, could this tool be used by a researcher who wants to see if a research topic would fare well if submitted to a regular solicitation if that solicitation were identified (e.g., DEB Core Programs)? Also, it might be helpful to provide additional details on what information would be needed when using the ProSPCT tool. Please confirm that only PIs have the ability to submit a Concept Outline using the ProSPCT tool and that SPOs or AOR do not have the ability to submit on behalf of a PI. | Concept Outlines are only required under the PAPPG for the specified proposal types, but other NSF funding opportunities may utilize Concept Outlines as part of the submission process. Concept Outlines are not intended to pre-judge the outcome of a competitive proposal submission through merit review, but they can help a prospective PI to identify the most appropriate funding opportunity for a potential project before assembling a full proposal to meet specific requirements. ProSPCT could be used in the manner described for a regular solicitation where there is no Concept Outline requirement to make a general inquiry. Like past practice where required concept outlines were sent by email to a program point of contact, we expect in most cases the PI would be sending Concept Outlines directly; however, the ProSPCT form is flexible such that a staff member could complete the form on behalf of the PI. Additional user help tips are planned for ProSPCT based on feedback and will also be clarified in the revised PAPPG text. |
| 19 | Columbia University | Letters of Collaboration | II.D.2.i(iv) | II-28 | The PAPPG indicates that the recommended format for letters of collaboration should be: "If the proposal submitted by Dr. [] entitled [] is selected for funding by NSF, it is my intent to collaborate and/or commit resources as detailed in the Projection Description or the Facilities, Equipment, and Other Resources section of the proposal." Multiple potential industry collaborators have indicated that this format is just not workable for them. The basic issue is embodied by the following response from one potential collaborator: "My lawyers are going to freak if I sign something that's committing to something written in another document." University grants personnel have suggested that to address this issue, the letter can be modified to be self-contained, which they understood was not a violation of the NSF guidelines for such letters. However, NSF program managers have indicated that this approach is considered to violate the NSF guidelines. Without such a letter, reviewers question whether proposed industry collaborations are real even if a PI has a long track record of working with such industry collaborators. I believe the NSF guidelines for industry letters if interpreted as such are a significant hinderance to collaborative proposals with industry partners. I believe that NSF would like to see NSF-funded research have real-world industry impact, and so I hope appropriate changes can be made to these guidelines to encourage, rather than discourage, industry collaboration so that our research can have a greater industry impact in practice. | NSF revised the language in the draft PAPPG to specifically state "while not required", as the Foundation understands that the recommended language is not appropriate for use in all letters of collaboration. |
| 20 | Santa Fe Institute | Concept Outlines | I.D.1 | I-3 | While it appears that the concept outline tool could be useful in terms of tracking program interest in certain submissions, it is concerning that the ProSPCT tool to be utilized for submission of Concept Outlines will be separate from research.gov. This separate tool adds the burden of requiring an additional sign in via a valid and active login.gov account which many PIs do not currently have. If submission of the Concept Outline tool by either email or through research.gov were available, this new form (to be required for some types of proposals) would be less burdensome at a time when multiple new burdens are proposed to be added under the 2023 PAPPG as currently drafted. In that regard, since the NSF response to the Concept Outline will come via email, it isn't clear why submission via the login would be more helpful than simply using email but requiring a certain format for these Concept Outlines where they are requested. In addition, it would be very disappointing if the Concept Outline discouraged direct one-on-one discussions of research ideas between potential applicants and NSF Program Officers. Such discussions are a very valuable part of the process of seeking funding and add additional transparency to the process. NSF should consider including language in the PAPPG that encourages direct communication with the program where appropriate (in the same way that many NSF Solicitations do), whether or not a Concept Outline will ultimately be required and submitted. | <p>Login.gov is a shared service required for a growing number of public-facing federal business systems. Research.gov accounts can already be accessed with Login.gov credentials, and a single Login.gov username and password allows users access to ProSPCT, BAAM, and Research.gov as well as other services from other agencies.</p> <p>The ProSPCT form was developed specifically because historical email-based approaches presented multiple operational risks and could not be effectively scaled. The structured form ensures submissions meet consistent minimal formatting requirements while still being open to any potential user who may or may not have an established account in Research.gov. NSF seeks to continually improve our systems and is exploring future integration into the research.gov site.</p> <p>NSF concurs that discussions of research ideas between potential proposers and NSF Program Officers are valuable. And, we believe the ProSPCT will encourage more of these interactions. ProSPCT provides a clear entry point for potential proposers who do not have well-established relationships with Program Officers while also ensuring that for proposal types and funding opportunities requiring Concept Outlines, there is transparency and consistency in the requirements for and handling of submissions.</p> |
| 21 | Santa Fe Institute | Certifications Provided by Senior Personnel | II.D.1 | II-7 | This section states in part that "Senior personnel are required to update their Current and Pending Support disclosures prior to award, and at any subsequent time the agency determines appropriate during the term of the award". However, at the recent NSF Virtual Grants Conference it was stated by one of the presenters in the Policy Update Section (possibly in the Q/A function) that only updated disclosures on current awards were required prior to award (not updated disclosures on pending awards). If this statement is/was correct, can this section of the PAPPG be clarified to state exactly what updated disclosures are required when updating Current and Pending documents prior to/at the time of award? If this statement is/was not correct, can NSF review the content of the Virtual Grants Conference as posted on the NSF website to verify that any statements made by presenters at the Conference are consistent with the proposed guidance in the PAPPG? | Updated current and pending support must be provided as follows: (1) When requested by the cognizant NSF Program Officer prior to making a funding recommendation; (2) after award, if the AOR discovers that current support that should have been provided at the time of submission, a notification must be provided to NSF; and (3) if a PI or co-PI receives new active support after the award has been made or after submission of the last annual project report. |
| 22 | Santa Fe Institute | Page Limitations and Inclusion of Uniform Resource Locators (URLs) within the Project Description | II.D.2.d(iii) | II-11 | It would be helpful if this section explicitly acknowledged that there are some types of proposals (primarily large Center or Center-type proposals) where proposals are allowed and expected to be longer than 15 pages, per the applicable Solicitation. In Fastlane Project Descriptions (PDs) longer than 15 pages currently generate warnings, even for Solicitations where longer page lengths are allowed. Presumably research.gov will be configured to permit submissions with PDs longer than 15 pages where appropriate; it would be helpful if no warning (or error) message were generated for proposals where the Solicitation allowed the longer page limit. | In accordance with the PAPPG, a solicitation can deviate or supplement the guidance provided in the PAPPG. |
| 23 | Santa Fe Institute | SciENcv | II.D.1.e | II-7 | The NSF REU Program Solicitation requires biosketches to be modified to indicate when any coauthors on listed products are undergraduates, via an asterisk (this requirement is long standing and is contained in the newly released Solicitation NSF 22-601). There may be similar requirements in other NSF Training/Mentoring programs. Does/will SciENcv allow this type of modification? If not, the requirement will need to be removed from the REU or any similar training/mentoring Solicitations. This would be an unfortunate change, as it is very helpful to reviewers to have information about the previous experience of senior personnel publishing with undergraduate researchers and other mentees. | SciENcv currently does not support this. Additionally, it would be extremely difficult to implement since SciENcv heavily relies on automatically generating citations from identifiers. In a world where proposers have to type everything out this isn't an issue, but it is when you try to lift that burden. |

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| 24 | Santa Fe Institute | SciENcv | II.D.1.e | II-7 | <p>The requirement that SciENcv be used for generation of these documents is a potentially very concerning additional administrative burden. In this regard, it has been reported, and was commented on by presenters at the Proposal Submission Modernization Update and the Proposal Policy and Awards Update Sessions at the recently held NSF Virtual Grants Conferences, that there have been recent difficulties and delays experienced by the community in uploads of SciENcv CPS documents to research.gov as well as in formatting those documents. NSF should review those comments from the Virtual Grants Conference and take them into account in finalizing this section of the draft PAPPG.</p> <p>The additional administrative burden of requiring submission of Biosketches and CPS documents only in SciENcv format is extremely high when combined when the additional administrative burden of requiring application submission only via research.gov (as opposed to Fastlane) beginning in January 2023. NSF should consider delaying the exclusive use of SciENcv for another year until after full implementation of application submission only in research.gov. In considering the extent of this very high burden, NSF should take into account that institutional sponsored research and administrative staff are already facing very significant workload challenges because of on-going difficulties in maintaining necessary staffing levels during the Covid pandemic. This large administrative burden could be greatly alleviated by only requiring CPS documents as part of a Just in Time request, as well as by delaying exclusive use of SciENcv for biosketches and CPS documents for one year.</p> | <p>The use of SciENcv for the creation of NSF-required biographical sketch and current and pending support documents is a vast improvement for researchers over the static, NSF fillable formats. The benefits include:</p> <ul style="list-style-type: none"> - Pre-population of data: By linking accounts to ORCID, proposers may see a reduction in the administrative burden associated with preparing these sections of the proposal. - Ability to have multiple versions: Proposers can easily access multiple versions of the NSF-required documents and customize them to align with the requirements of a specific funding opportunity. - Ensures compliance with current NSF policy: Use of SciENcv ensures that proposers are using a compliant version of the biographical sketch and current and pending support documents. <p>In addition, the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Section 223(a)(1) (42 USC 6605(a)(1)) requires all senior personnel identified on a proposal submitted to NSF to certify that the information provided in their Biographical Sketch and Current and Pending Support documents are accurate, current, and complete. SciENcv has developed an electronic signature mechanism that will meet this statutory requirement and ensure NSF compliance with this requirement. Other agencies that use SciENcv also will use this mechanism to collect the requisite electronic signature.</p> <p>NSF does understand, however, that mandatory use of SciENcv will require organizations to train researchers to ensure implementation of this new requirement. To provide sufficient time for such training, NSF will be extending the implementation for THIS requirement in the 2023 PAPPG until October 2023. The specific date will be announced to the NSF proposer community when available.</p> |
| 25 | Santa Fe Institute | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>This section should be modified to define and clarify what is meant by 'field research' and 'fieldwork' for the purposes of this section (both terms are used in the proposed guidance, apparently interchangeably). For example, would meetings of the research team held in remote locations be included if the researchers were meeting to analyze previously collected data, but not to collect new data? Would research training sessions held remotely/away from the home institution be included? Would research conducted virtually (such as interviews with persons outside the home institution conducted via Zoom or similar technology) be considered fieldwork?</p> <p>The amount and specificity of required information to be included in this section appears to be more than could thoroughly be described in two pages, particularly for large proposals with multiple research sites and/or numerous participating institutions. NSF should consider increasing the page length, relating the page length to the number of participating institutions, or eliminating any prescribed page limits.</p> | <p>The definition of 'in the field' is data/information/samples being collected off-campus or off-site. It does not include virtual meetings or research training sessions held off-campus unless it were training in field methodologies. NSF believes that a 2-page limit, similar to other required supplementary documents such as the Data Management Plan, provides sufficient space for the required information.</p> |
| 26 | Campus Safety, Health and Environmental Management Association (CSHEMA) | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>Expansion of the Safety Definition: As EHS professionals, we feel that it is imperative that this safety plan include safety considerations beyond potential for harassment. Physical, environmental, health, and activity hazards in field environments have all led to the deaths of researchers (see Table 1) in recent years. As consistent reporting of field incidents is not tracked, we feel that true incident rates are higher, even accounting for the higher degree of risks involved. As safety and security are closely linked within the field environment, inclusion of these elements would not greatly impact the overall administrative burden of creation of these plans and would greatly enhance the safety of field research personnel. Elements should include a description of the safety hazard, possible risk, and mitigation strategy. Emergency/Incident response plans can be inclusive of security/harassment as well as other possible emergency protocols.</p> <p>Tied into this expansion would be the inclusion of researcher mental health. The same challenging circumstances that can exacerbate the risk of harassment can also be problematic for researcher mental health (e.g., John and Kahn, 2018).</p> <p>Nelson et al. (2017) indicated that rules and enforcement of those rules are essential for safe and successful field work. Thus, a description of consequences for non-compliance must be added to ensure that researcher teams meet this goal.</p> <p>In order to accommodate this expansion in scope, it is recommended that the page limit be increased by one page to a total of three pages.</p> | <p>The PSI-FVAR is not meant to supplant or duplicate the Environmental Health and Safety (EHS) units at institutions of higher education. The PSI-FVAR is limited to safety from harassment in field situations. The 2-page supplementary document will be reviewed as an integral part of the proposal, and will be considered under intellectual merit or broader impacts, or both, as appropriate for what is being proposed. Updates, concerns, or changes on an individual PSI-FVAR should be documented in Annual Project Reports and by communication with the cognizant NSF Program Officer.</p> |
| 27 | Campus Safety, Health and Environmental Management Association (CSHEMA) | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>Training and Resource Availability: Researchers in field environments often do not benefit from the defined safety structures and administrative oversight that is present for laboratory, biosafety, and animal research, as field research safety programs with dedicated staffing are nascent or non-existent at most institutions. Adding the requirement that an institutional responsible entity be established, in-line with other safety areas such as biosafety, would push institutions to improve overall management of risks in these areas.</p> <p>Most available institutional training (e.g., harassment, discrimination, etc.) is not tailored to field environments. Confounding factors such as a lack of reporting mechanisms, no access to emergency services, or altered legal landscapes can render the training inadequate for field research applications. We think that it would be prudent for the NSF to develop standardized training content for field researchers in these areas. Alternatively, additional funding opportunities to tailor training content and improve access could be made available through the NSF.</p> | <p>NSF does not have the authority to require organizations to establish such an entity. However, because the PSI-FVAR is now required for all proposals with field work, organizations may decide to develop new training programs tailored to field environments. NSF has funded conferences to facilitate the development of best practices and their broad dissemination.</p> |
| 28 | Campus Safety, Health and Environmental Management Association (CSHEMA) | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>Inclusion and Anti-Discrimination for All: While we agree that field environments have a higher degree of risk and complication that requires a specific plan be put in place, we also believe that all researchers should be apprised of the NSF expectations for safe and respectful conduct. As such, we believe the expectations should be placed in a location where they would apply for all research groups. This document should also identify basic conduct expectations for NSF researchers interacting with the communities where they are conducting research activities. Conduct expectations should also include non-consensual acts as unacceptable.</p> <p>The language included in this change avoids specific mentions of harassment related to minority status. Demery and Pipkin (2021) identify individuals from minority identities related to race/ethnicity, sexual orientation, disability, gender identity, and/or religion as being significantly at-risk of harassment or prejudice. Each of these categories should be included in language. Sexual harassment and assault should be cited specifically due to the high prevalence of these experiences in certain populations of field researchers (e.g., Clancy et al., 2014).</p> <p>Harassment and discrimination concerns can be internal to the field team or from the external community. More emphasis should be made to distinguish between these scenarios, as the risk mitigation strategies and response tools will be different in each case. Additional in-group risk factors may include the type of accommodations expected and power dynamics/imbbalances.</p> | <p>NSF's Important Notice #144 noted that the Foundation does not tolerate any kind of harassment, within the agency, at grantee organizations, field sites, or anywhere NSF-funded science and education are conducted. The PSI-FVAR requirement is one step to help actualize safe and inclusive environments in field situations that, as is noted in the comment, often incur a higher degree of risk and complication. Inclusion and safety from harassment are a consequence of both internal dynamics of the field team and interactions with the external community at field locations. Details on both should be discussed under Section 1 (Background Information).</p> |

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| 29 | Campus Safety, Health and Environmental Management Association (CSHEMA) | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i.(xi) | II-29 | <p>Suggested Language: Field research is a necessary component of many STEM fields. Fieldwork presents unique challenges to managing the safety and security of field researchers. The likelihood of harassment can also be increased in these areas, including but not limited to, challenging physical conditions, social isolation, and limited communication methods. All research should be done in a safe environment that is free from harassment.</p> <p>It is NSF's expectation that:</p> <ol style="list-style-type: none"> 1. All personnel will treat others with dignity and respect, will exercise the highest level of professional and ethical behavior, within the team and with respect to the surrounding community and environment; and, 2. It is everyone's responsibility to provide a safe and inclusive workplace. While not exhaustive, the following acts are examples of conduct that do not meet NSF's expectations: <ol style="list-style-type: none"> a. Abuse of any person, including, but not limited to, assault, harassment, stalking, bullying, or hazing of any kind, whether the behavior is carried out verbally, physically, electronically, or in written form; or, b. Conduct that is unwelcome, non-consensual, offensive, indecent, obscene, disorderly, or unsafe; or, c. Conduct that is derogative to individuals based on their race/ethnicity, sexual orientation, disability, gender identity, and/or religion whether the behavior is carried out verbally, physically, electronically, or in written form. | Thank you for your comment. |
| 30 | Campus Safety, Health and Environmental Management Association (CSHEMA) | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i.(xi) | II-29 | <p>Suggested Language: The PSI-FVAR will document background information, pre-deployment activities, and plans for conduct while in the field and must include the following sections:</p> <ol style="list-style-type: none"> 1. Background Information <ol style="list-style-type: none"> a. Description of Field Locations – (Note: only one PSI-FVAR is required per proposal if the research involves multiple locations). b. Description of the physical, health, field activity, and personal security hazards and safety risk factors present at the field locations. c. Description of the harassment risk factors external to the group. For example, diversity differences between local community and group, legal system differences or barriers, cultural customs, and access to emergency and/or health care services. d. Description of harassment risk factors internal to the group. For example, accommodations, power dynamics/imbances, off-duty time, relationships, and privacy expectations. 2. Preparation for Fieldwork <ol style="list-style-type: none"> a. Training- Include description of required training courses related to safety, first aid, anti-harassment, misconduct, etc. that will be assigned to researchers. b. Planned processes to establish shared team definitions of roles, responsibilities, and culture (these identified executive summaries do not replace the need for specific detailed plans should be developed for distribution and training for field researchers). i. Executive summary of how safety expectations and conduct rules are defined and how a culture of safety and inclusivity will be maintained. ii. Executive summary of risk assessment which describes how probability and severity of possible negative events were calculated. iii. Executive summary of field safety plan which identifies mitigation strategies to reduce risks. iv. Executive summary of communication plans. For example, description of means of communication, check-in plans, escalation communication procedures; specifics if multiple organizations involved; consideration of involvement outside the funded organization(s). c. Field Support Plan- Include information related to active monitoring of conditions and support of field researchers. Also include details related to the enforcement of safety expectations and conduct rules, such as disciplinary procedures. | Thank you for your comment. NSF does not intend to expand the PSI beyond the scope of safety from harassment and providing an inclusive environment. |
| 31 | Campus Safety, Health and Environmental Management Association (CSHEMA) | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i.(xi) | II-29 | <p>Suggested Language (continued from #55):</p> <ol style="list-style-type: none"> 3. Emergency Response and Recovery <ol style="list-style-type: none"> a. Incident Response Plan- Should cover response activities surrounding situational scenarios related to potential risks identified in previous sections including but not limited to: <ol style="list-style-type: none"> i. Medical or health related incident, mental health related incident, missing person, search and rescue event, natural disaster, security threat/event, terrorism, global health event, civil unrest event, weather emergency; or, ii. Significant conduct/rule non-compliance or violation with any of the established expectations. b. Reporting Plan-Should cover mandatory reporting requirements and support assistance resources (e.g., points of contact, hotlines). c. Recovery Plan- Should include procedures for resuming field activities post-incident, if possible. Include survivor support resources available. Identify conditions that trigger an immediate cessation of research activities. If cessation of activities is necessary, identify procedures for returning to home institution(s). | Thank you for your comment but your recommended changes are beyond the scope of the PSI. |
| 32 | University of Arizona | NSPM-33 | II.D.2.h | II-22 | Since the January 2022 release of the Office of Science and Technology Policy Guidance for Implementing NSPM-33, we have eagerly awaited federal agency guidance and clues to next steps. We are grateful that the draft PAPPG addresses the core principle from the OSTP document that policies and consequences must be applied without discrimination. While the PAPPG has always referenced non-discrimination, the Section M in Chapter II reinforces the point. | Thank you for your comment. |
| 33 | University of Arizona | Disclosure Requirements | II.B. | II-2 | We appreciate the addition of Section B. NSF Disclosure Requirements to Chapter II: Proposal Preparation Instructions. Creating an additional section for this information is very useful to sponsored projects officers and departmental research administrators assisting faculty with proposal preparation, Just-In-Time, and Project Reporting. We think it is critical that the National Science Foundation use the listed factors (page 34) in determining consequences, as many in the grantee community are concerned about simple mistakes of timing, intent, and human error and how those mistakes can be corrected without creating the need for formal investigation. | Thank you for your comment. |
| 34 | University of Arizona | Proposal Certifications Provided by the Organization and Provided by Senior Personnel | II.D.1.d and II.D.1.e | II-5 | The separation of proposal certifications into two pieces is a great solution to issues raised since the comment period for NSF PAPPG 20-1. There will always be a limit to the information an awardee institution can certify on behalf of their investigators and senior personnel. It is important to have a certification at the level of senior personnel and distinguish it from the institution-level certifications that are needed on behalf of the grantee. Authorized Organizational Representatives (AORs) certify the institution's abilities to support the proposed project, and compliance with several regulatory items. Information in the biographical sketch and current & pending support documents is only partially held in AOR institutional systems, even the most comprehensive ones. Senior Personnel must bear responsibility for accurate and truthful disclosures of their activities. | Thank you for your comment. |
| 35 | University of Arizona | Senior Personnel Documents | II.D.2.h | II-24-26 | We are encouraged by the move to use SciENcv for both the biographical sketch and current and pending support forms. We hope this step will encourage other federal agencies to do the same. SciENcv must be enhanced with more testing and user experience work that includes faculty to ensure it can support them. While having an ORCID record makes the SciENcv process easier, work should be done to ensure that adding items that may not be in the ORCID record (Synergistic Activities, for instance) is seamless. The faculty and their delegates must be able to move back and forth between the two systems easily. | Thank you for your comment. |

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| 36 | University of Arizona | Senior Personnel Documents | II.D.2.h | II-24-26 | We strongly support the use of ORCID in reducing administrative burden. As noted above, work on faculty-centric user experience in SciENcv will be critical in ORCID adoption and proving the reduced burden. While we understand that not all NSF grantees will need/want an ORCID, we hope that NSF systems and forms will be updated to collect the ORCID in a prominent (even if optional) way, which can be perceived as a soft requirement. | Thank you for your comment. |
| 37 | University of Arizona | Senior Personnel Documents | II.D.2.h | II-24-26 | <p>Some items listed in Table 2a for Current and Pending Support create confusion in reporting on the Current and Pending Support form. This confusion creates conditions for non-compliance in disclosure reporting. The required report format does not fit with all the scenarios that must be reported on the support forms. The forms should be updated to be flexible in accommodating situations where things like dollar amounts or measurable levels of effort will not apply. This should be relevant for all requests for this information at the proposal stage, Just-In-Time, postaward, and project reporting. Some examples:</p> <p>Support in the form of Visiting Scholars or Students/Postdoctoral Researcher funded by other entities: While these relationships have a clear monetary value, many researchers will not be able to assign a level of effort to these interactions. If they are the scholar's/student's/postdoc's direct supervisor, they will certainly have a level of effort in managing them, but the Current and Pending Support forms do not ask the researcher to articulate the person-months devoted to team management or supervisory responsibilities. Requiring a separate reporting item of effort here is inconsistent with the way the rest of their management duties are treated. If they are not the direct supervisor of these individuals, they may not have effort at all for this interaction. Guidance should also clarify the treatment of visiting scholars/students who are funded via NSF mechanisms, such as Research Experience for Teachers/Undergraduate Students (RET/REU).</p> <p>In-Kind Contributions both intended/not intended for the current proposal: The NSPM-33 guidance directly addresses that In-Kind contributions may not have monetary value, so the current and pending support forms should not require a value if one cannot be determined. In-Kind contributions also may not require the commitment of any effort above the effort already listed on the current proposal. Gifts, additional funds to meet cost sharing requirements, institutional start-up funds, and similar items do not automatically create a need for more of the researcher's effort. We would appreciate more clarification and examples for items more appropriately reported as Facilities, Equipment, and Other Resources vs. Current and Pending Support.</p> <p>It would be very helpful if the forms allowed for the selection of value ranges, including \$0 or 0% when addressing overlap of funding or effort for items that do not have a measurable amount for either.</p> | NSF is making adjustments to the Current and Pending Support format to address the issues identified. |
| 38 | University of Arizona | Conflict of Interest Policies | IX.A | IX-1 | <p>Addition of "venture or other capital financing" to Significant Financial Interest (SFI) Definition:</p> <p>* Improper venture or other capital financing can create financial conflicts of interests as well as other research security risks, regardless of monetary value. In fact, placing a monetary value on this SFI would likely lead to financing caps that are designed to avoid disclosure. The minimum disclosure requirement for venture and other capital financing should be the full name and address of the individual(s) and/or entity(ies) that provided the financing, regardless of the amount of the financing. This will provide institutions with the initial information they need to conduct their due diligence in determining whether the venture or other capital financing creates a financial conflict of interest or could otherwise improperly influence research or create a research security risk.</p> <p>*We would like additional clarity on</p> <ul style="list-style-type: none"> o How confidential financing information will be protected when it is disclosed. This information could be considered a competitive advantage when in the wrong hands, and researchers may (understandably) be unwilling to disclose it for that reason. o How awardee entities are expected to report this to the National Science Foundation. | NSPM-33 requires disclosure of venture and other capital financing. NSF's Awardee COI Policy requires such disclosure to a responsible representative of the awardee (PAPPG Chapter IX A). Since disclosure is made to the awardee, it is the awardee's responsibility to protect such disclosure. NSF's Awardee COI Policy requires disclosure of information sufficient to determine whether a SFI could affect the design, conduct, or reporting of NSF funded research. The awardee can determine what information is sufficient. The awardee only reports information to NSF if a COI is unmanageable or if the research will proceed without conditions or restrictions when a COI exists. |
| 39 | University of Arizona | Research Security | IX.C | IX-4 | <p>All previous comments on disclosure of activities in current and pending support pages apply to Postaward and Annual and Final Project Reports. The listed factors (page 34) in determining consequences are as critical here as they are for proposal preparation.</p> <p>We appreciate the National Science Foundation's work with the Federal Demonstration Partnership (FDP) on research security. Thank you for the opportunity to comment. The University of Arizona values how open, available, and collaborative the NSF Policy Office has always been.</p> | Thank you for your comment. |
| 40 | ESA-UFERN | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>We are eight professionals who have dedicated a large part of our careers in leadership roles working to make teaching and learning in the field a positive, safe and inclusive experience for students. We hail from professional organizations, research coordination networks, higher education institutions, and nonprofit organizations in the environmental sciences. While not presenting organizational or institutional positions on the PSI-FVAR, this letter presents a consensus among the eight of us based on our deep experience in this arena, and the conversation we facilitated in a Water Cooler Chat on the topic hosted by the Ecological Society of America and the Undergraduate Field Experiences Research Network on June 6 2022 and attended by 98 individuals.</p> <p>We are heartened that the National Science Foundation is taking an important step in ensuring safe and inclusive research and educational environments. Fieldwork, from urban field sites to the most remote field sites in Antarctica or on vessels in the middle of the ocean, is critical for the scientific enterprise across a broad array of NSF-funded disciplines and critical for training the next generation of scientists and scientifically-literate public. Just as critical is that everyone has a research and/or education experience that is safe and inclusive.</p> | Thank you very much for your leadership in the area of field research. NSF greatly appreciates receiving valued input from the diverse stakeholders you convened. |
| 41 | ESA-UFERN | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>(Continued from #65)</p> <p>We wholeheartedly support the proposed addition of a plan for safe and inclusive field/vessel/aircraft research to NSF proposals that conduct research in the field. A body of literature has identified potential risks to safety in field environments, including sexual and other types of identity-based harassment, microaggressions, sexism, racism, homophobia, transphobia, ableism and discrimination based on religion, citizenship status, or other protected categories that create unsafe learning and working environments (e.g., Clancy et al. 2014; Pickrell 2020; Olcott and Downen 2020). These behaviors can come from members of a research team, others outside of the research team participating in research-related activities, or non-research related members of the public. Assessments of the potential risks and their impacts on all members of the research team need to be conducted and protocols put into place to reduce risk of harm and support people if harm does occur. We agree with NSF that the creation and implementation of a plan ahead of the fieldwork is critical.</p> <p>For example, research on sexual harassment (Nelson et al. 2017) found that clearly identified, communicated and enforced rules with consequences lead to more positive field experiences, whereas the most negative and unsafe experiences occurred in field environments without rules and responses to violations. The National Academies of Sciences 2018 report on sexual harassment concluded that its role as a barrier to equitable participation in academic science, engineering, and medicine "will be more effectively addressed in higher education if the standards of behavior are also upheld in off-campus environments such as collaborative research and field sites."</p> | It is NSF's intention that the PSI-FVAR will both enable organizations to document their best efforts to mitigate against these risks, and to enable feedback where improvements may be warranted. |

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| 42 | ESA-UFERN | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>Accountability: It is critical that the policy be enacted, but equally important is ensuring accountability. Possible starting point actions regarding accountability include:</p> <p>The plan presented in the PSI-FVAR supplement should be a living document. Involving everyone, from undergraduate student participants and graduate student field instructors to Principal Investigators, in developing and maintaining the plan improves both communication and accountability.</p> <p>* The proposed plan should make the expectations for each person in the team clear and explain in detail how the plan will be communicated and upheld.</p> <p>* The proposed plan should provide a mechanism for assessing its effectiveness and for members of the research team to provide feedback confidentially and in a timely fashion.</p> <p>* NSF reporting mechanisms may be one way to support accountability. In the same way that annual reports are required to provide progress in meeting project goals, they also could include a description of how the PSI-FVAR plan was implemented over the reporting period. Any issues that came up in the living safety plan could be explained, including the steps taken to address them. Whatever reporting mechanisms are decided, they should be broadly shared with the community at the time the new policy is announced, in order to increase confidence in the effectiveness of the policy.</p> <p>* Proposal reviewers may need guidance on what constitutes appropriate and effective plans for safe and inclusive fieldwork. Such guidance should be grounded in evidence-based research. It is critical that reporting and accountability does not increase the burden on the most vulnerable. Intentional plans should be expected to allow for reporting and for supporting (e.g., Holland et al. 2021) and reduce the potential for retaliation. Reporting unsafe or exclusionary field practices should not result in loss of funding or opportunity.</p> | <p>A response to each comment provided follows: Accountability is inherent in merit review of the PSI-FVAR in proposals and during review of Annual Project Reports for awards with a PSI-FVAR thereafter.</p> <p>(1) PSI-FVAR are intended to address all individuals involved in the fieldwork. (2) PSI-FVAR enable organizations to describe their expectations of the team, as well as communications. (3) PSI-FVAR enable organizations to describe how they will assess effectiveness and provide feedback. The PSI-FVAR will be reviewed as an integral part of the proposal, and will be reviewed under intellectual merit or broader impacts, or both, as appropriate for what is being proposed. The PSI-FVAR also will be considered as part of the annual and final project reporting process. (4) NSF Program Officers and reviewers will be provided with instructions on how to review the PSI-FVAR.</p> |
| 43 | ESA-UFERN | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>Comprehensive: The new policy should encourage and support field research teams to take an explicit and comprehensive view of workplace climate. Identity-based harassment, discrimination and aggressions, including those based on race and ethnicity, gender identity, sexual orientation, ability, religion, citizenship and immigrant status), should be recognized specifically. Plans for safe and inclusive fieldwork also should include language about accessibility. Effective plans recognize disproportionate risk for different people, and include specific language on the role of identity. There is a rich body of literature on suggested practices and guidelines that field research programs should consider for a range of identities beyond gender (e.g., Anadu et al. 2022; Amon et al., 2022; Stokes et al., 2019; Demery & Pipkin, 2021; Coon et al. 2022).</p> | <p>NSF intends the PSI-FVAR to provide an opportunity for organizations to describe their policies, views, and practices to best implement safe and inclusive fieldwork for all types of individuals involved. NSF concurs that the sharing of promising practices across communities could accelerate organizational improvements.</p> |
| 44 | ESA-UFERN | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>Integrated: It is important to emphasize that the PSI-FVAR policy is intended to highlight how actions to ensure the safety of all team members, especially those most vulnerable because of their identity or position in the organizational hierarchy, are incorporated into the proposed work. In other words, the proposed plan for safe and inclusive fieldwork should be integral to the rest of the proposed work, and not just a checklist on the side. We propose the following as initial actions regarding integration:</p> <p>* The proposed plan should be integral to the proposed fieldwork; - rather than a rigid checklist, it should be an actionable, integrated framework.</p> <p>* The proposed plan should be aligned with the goals and scope of the project and project team (and what is likely to be most needed for the context of the proposed work).</p> <p>* The plan should be a living document that is relevant, addressing time and place, making changes as needed with input from everyone involved.</p> | <p>NSF intends the PSI-FVAR to be integral to the proposal and an opportunity for organizations to describe how their specific fieldwork program will be implemented in a safe and inclusive manner.</p> |
| 45 | ESA-UFERN | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>Evidence-based Training: Training is important for raising awareness and providing tools, yet it can often be undertaken with little consideration for its relevance to the proposed work or for its effectiveness. Training should be integrated into the proposed work and not treated as something to check off a list as part of the supplement document. Possible starting point actions regarding training include:</p> <p>* The PSI-FVAR plan should identify the type and approach of training and its relevance to the proposed work as well as who in the research team will participate. In most cases we expect that all participants will receive training in safe and inclusive fieldwork practices.</p> <p>* NSF should provide criteria for effective training so that proposals can indicate how they meet those criteria in their plans, especially given research that shows how trainings that do not use evidence-based practices may be counter effective (NASEM 2018).</p> <p>* NSF should provide salient references and other resources to help PIs find, evaluate and utilize evidence-based training approaches and practitioners.</p> | <p>It is NSF's intention to develop and post FAQs for the preparation of the PSI-FVAR. NSF believes that these FAQs will assist the community in further understanding of the PAPPG language.</p> |
| 46 | ESA-UFERN | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>NSF's Role: NSF should embrace their role in funding the highest quality proposals with comprehensive and integrated plans. Access to funding is not enough, however. NSF needs to provide resources - to support training and under-resourced institutions and to provide clarity for the entire process, including clear criteria for reviewers. We encourage NSF to continue funding programs that study the effectiveness of different practices to improve safety, inclusion and accessibility at field locations. NSF can play a pivotal role in achieving the goals of the new PSI-FVAR policy by:</p> <p>* Communicating about the new policy broadly, and providing on-going support to the community for its implementation via webinars, workshops at professional association meetings and on-line resources. Assuring that the plans for safe and inclusive fieldwork responding to the PSI-FVAR supplement are reviewed with clear and transparent criteria, and that PIs receive constructive feedback from panels and program officers.</p> <p>* Provide funding within project budgets for the time and expertise required to implement an effective plan (e.g., training expenses, etc.).</p> <p>* Develop resources and other strategies that can help small and under-resourced institutions develop and implement effective plans by tapping into community resources.</p> <p>* Develop clear guidelines for reporting about the plan in annual and final reports.</p> <p>* Provide funding for research projects to study the effectiveness of different practices to improve safety, accessibility and inclusion in fieldwork.</p> | <p>It is NSF's intention to develop and post FAQs for the preparation of the PSI-FVAR. NSF believes that these FAQs will assist the community in further understanding of the PAPPG language.</p> |
| 47 | ESA-UFERN | Plan for Safe and Inclusive Field/Vessel/Aircraft Research | II.D.2.i(xi) | II-29 | <p>Open pathways for communication: We encourage NSF to develop open pathways for communication with universities and colleges, field stations, marine labs and other institutions about these new guidelines. We are concerned that universities and colleges, especially those with few resources, may be deterred and could choose not to support field research if they begin to see it as too risky. NSF needs to emphasize the importance of safe, inclusive and accessible field research for training and for the scientific enterprise.</p> <p>It is our hope that this new policy will include mechanisms for adaptation; that policies and procedures be revisited periodically and be modified in response to public feedback and that data be collected on their effectiveness.</p> | <p>Thank you for sharing your concerns regarding organizations' participation in field research. Beyond the coverage specified in the 2023 PAPPG, NSF's implementation of the PSI-FVAR will include the development and posting of FAQs, as well as instructional materials for use by both NSF program staff as well as NSF's reviewer community. and instructions to merit reviewers. NSF anticipates that lessons learned from this implementation will produce useful feedback on PSI-FVAR, and inform any future modifications to NSF's implementation strategy.</p> |
| 48 | NSF OIG | Definitions | Introduction D. | xiv-xv | <p>Suggest you alphabetize terms to facilitate searches for definitions.</p> | <p>Thank you for your comment. NSF has incorporated this suggestion.</p> |
| 49 | NSF OIG | When to Submit Proposals | I.F. | I-7 | <p>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.</p> <p>[Note: Carried over from 2018 and 2019]</p> | <p>Thank you for your comment. The ability to receive verbal approval only is absolutely vital in cases of natural or anthropogenic events. We have received numerous complaints from PIs who did not even have access to a computer during the natural event, but wanted NSF to be aware that their proposal would not be able to be submitted on time. The Foundation believes that it is vital to retain such flexibility in cases of natural or anthropogenic events.</p> |

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| 50 | NSF OIG | Senior Personnel Salaries & Wages Policy | II.D.2.f(i)(a) | II-14 | <p>"As a general policy, NSF limits the salary compensation requested in the proposal budget for senior personnel to no more than two months of their regular salary in any one year. ... If anticipated, any compensation for such personnel in excess of two months must be disclosed in the proposal budget, justified in the budget justification, and must be specifically approved by NSF in the award notice budget."</p> <p>Chapter II, Sec. D.2.h.(ii)(e) [Current and Pending Support] states, "Person-month information included in current and pending support may differ from the person-months requested on the budget for a given project. The information contained on the budget is separate and distinct from the information entered on current and pending support regarding how much time the individual is or is planning or has committed to spend on a project."</p> <p>This allows for a situation in which salaries for senior personnel are budgeted for no more than 2 months per year simply to comply with the budgeting limitation when the intent is for the individual(s) to spend more than 2 person-months per year on the project. In those cases where the budget reflects a lower senior personnel commitment than truly anticipated, suggest NSF require that the budget justification clearly state that the senior personnel salary budget does not reflect the anticipated salary for senior personnel and the actual salary charged to the award likely will be greater than budgeted.</p> | NSF respectfully disagrees with the proposed revision as the current and pending support document is not used by NSF for budgeting purposes. Rather, it is used by program officers to: 1) determine whether PIs have bandwidth to perform the proposed research effort; and 2) avoid duplicate support of same research (federally and internationally). NSF believes the proposed language revision is not appropriate because there is no incentive for grantees to be "dishonest" up front in their budgeting. If more than 2 months salary is needed, grantees may request and justify it. Post award, if PIs need more effort than was approved, grantees have rebudgeting authority without prior NSF approval, if the scope is unchanged. Finally, it is important to note that research needs and staffing are very fluid during the period of performance. Such changes can often impact the direction of the research and thus affect the level of effort required. |
| 51 | NSF OIG | Proposal Preparation Checklist | Exhibit II-1 | II-60 | <p>"If the project (or any part of the project) now being submitted has been funded previously by a source other than NSF, provide the required information describing the last period of funding."</p> <p>We recommend NSF adopt similar language to NIH Form PHS 398/2590 Other Support, which requires explicit statements to address any potential overlap (scientific, budget, effort level) and how it would be resolved.</p> <p>[Note: Carried over from 2019]</p> | NSF deliberately states that the Proposal Preparation Checklist will be updated upon resolution of comments. Current and pending support will require a statement on any potential overlap. How it will be resolved must occur on a case-by-case basis. |
| 52 | NSF OIG | Facilities, Equipment and Other Resources | II.C.2.g | II-23 | <p>"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."</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. 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.</p> <p>[Note: Carried over from 2018 and 2019]</p> | Language has been modified. |
| 53 | NSF OIG | NSF Award Conditions | Part II Overview | VI-1 | <p>"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."</p> <p>This sentence is confusing in light of the preceding sentences, which state, "Part II of the NSF Proposal & Award Policies & Procedures Guide sets forth NSF policies regarding the award, administration, and monitoring of grants and cooperative agreements. Coverage includes the NSF award process, from issuance and administration of an NSF award through closeout. Guidance is provided regarding other grant requirements or considerations that either are not universally applicable or do not follow the award cycle." NSF General Grant Conditions require recipients to comply with NSF policies (NSF General Grant Conditions, Article 1.d.2), which are set forth in this document. The sentence in question could wrongly lead one to believe that only sections of the PAPPG specifically mentioned in award terms and conditions need to be followed. We strongly suggest that this sentence be removed.</p> <p>[Note: Carried over from 2018 and 2019]</p> | Thank you for your comment. In large part, the PAPPG provides guidance, instructional, 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. In addition, the first five chapters of the PAPPG relate to preparation and submission of the proposal, and as such, it would be inappropriate to include as a term and condition. 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. |
| 54 | NSF OIG | NSF Award Conditions | VI.C | VI-2 | <p>"When these conditions reference a particular PAPPG section, that section becomes part of the award requirements through incorporation by reference."</p> <p>Please see our suggestions outlined in comment number 78</p> <p>[Note: Carried over from 2018 and 2019]</p> | Thank you for your comment. In large part, the PAPPG provides guidance, instructional, 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. In addition, the first five chapters of the PAPPG relate to preparation and submission of the proposal, and as such, it would be inappropriate to include as a term and condition. 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. |
| 55 | NSF OIG | Changes in Objectives or Scope | VII.B.1.a | VII-2 | <p>"The objectives or scope of the project may not be changed without prior NSF approval."</p> <p>We suggest adopting similar guidance to the National Institutes of Health that defines change of scope and provides potential indicators. This guidance can be found in section 8.1.2.5 of the NIH Grants Policy Statement. Alternatively, we suggest adding a list of circumstances that could be considered a change of scope. For example, significant increase/decrease in a PI's effort allocated to the project, a significant decrease in research opportunities for graduate and undergraduate students, and significant (> 25%) rebudgeting of costs among budget categories, which indicates a material change in the research methodology.</p> <p>[Note: Carried over from 2018 and 2019]</p> | Thank you for your comment. What constitutes a change in objective or scope is dependent upon the research being conducted, and is best determined by the PI, any co-PIs, and the awardee organization. |
| 56 | 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?"</p> <p>[Note: Carried over from 2018 and 2019]</p> | Thank you for your comment. What constitutes a change in methods or procedures is dependent upon the research being conducted, and is best determined by the PI, any co-PIs, and the awardee organization. |

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| 57 | NSF OIG | Annual Project Reports | VII.D.1 | VII-8 | <p>"NSF recommends that annual project reports be submitted no later than 30 days prior to the end of the current budget period. The report becomes overdue the day after the end of the current budget period if it has not been submitted by the PI and approved by the cognizant NSF Program Officer."</p> <p>As described in the PAPPG, the threshold for a report becoming overdue is reliant on both the submission of the report by the PI and the approval of the report by the PO. By only recommending (rather than requiring) that the report be submitted 30 days in advance, NSF is allowing for circumstances where a PO could receive a report with insufficient review time prior to the report becoming overdue. We suggest that NSF establish firm timeframe requirements for submission by the PI to ensure POs have adequate time for review.</p> | NSF's policy is that the annual project report is due at least 90 days prior to the end of the budget period. We concur that the additional language added to the PAPPG may be confusing to readers. The language has been modified to address this issue. |
| 58 | NSF OIG | Annual Project Reports | VII.D.1 | VII-8 | <p>"The report becomes overdue the day after the 90 day period ends."</p> <p>The addition of the prior paragraph makes this sentence unnecessary and consequently a bit confusing. It should be deleted, as the sentence directly above reads, "The report becomes overdue the day after the end of the current budget period if it has not been submitted by the PI and approved by the cognizant NSF Program Officer."</p> | The language has been modified to address this issue. |
| 59 | NSF OIG | Award Closeout | VII.D.5.d | VII-10 | <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> | Language has been modified. |
| 60 | NSF OIG | Unexpended Balance | VIII.B.1 | VIII-2 | <p>"Unexpended Balance – means the sum of the unobligated and obligated balances. An unexpended balance is the result of awarded funds not being spent, or when the total expenditures for a project are less than the amount awarded. It can also be defined as the unspent portion of a budgeted amount, available for authorized future expenses during the award period."</p> <p>Suggest the following: "Unexpended Balance – means the sum of the awarded funds not yet obligated by the recipient and obligated balances not yet paid by the recipient. An unexpended balance is the result of awarded funds not being spent, or when the total expenditures for a project are less than the amount awarded. It can also be defined as the unspent portion of a budgeted amount, available for authorized future expenses during the award period."</p> | Definition has been modified as follows: "Unexpended Balance – means the sum of the awarded funds not yet obligated by the recipient and obligated balances not yet paid by the recipient. An unexpended balance is the result of awarded funds not being spent, or when the total expenditures for a project are less than the amount awarded. It can also be defined as the unspent portion of a budgeted amount, available for authorized future expenses during the award period." |
| 61 | NSF OIG | Program Income | VIII.D.4.c(i) | VIII-6 | <p>"Program income earned during the project period should be expended prior to requesting reimbursement against the grant. In the event a recipient has unexpended program income remaining at the end of the grant, it must be remitted to NSF by crediting costs otherwise chargeable against the grant."</p> <p>This seems to contradict the first sentence of the preceding paragraph, "Unless otherwise specified in the grant, program income received or accruing to the recipient during the period of the grant is to be retained by the recipient, added to the funds committed to the project by NSF, and thus used to further project objectives." This language implies that NSF intends for program income to follow the "Addition" option established in 2 CFR 200.307(e)(2). However, the language quoted in the prior column, specifically, "should be expended prior to requesting reimbursement against the grant," is in line with the "Deduction" option established in 2 CFR 200.307(e)(1).</p> <p>NSF should clarify whether program income should have no impact on federal reimbursements (i.e., Addition) or be expended before requesting reimbursement (i.e., Deduction).</p> | <p>The 2nd paragraph in question is articulating that excess program income at the end of an award will be treated as deductive even if the recipient was permitted to apply the standard (additive) treatment during the life of the project. NSF does not want a recipient to retain excess/unused program income at the end of a project, rather the excess program income should be credited against costs originally charged to the government or remitted as a refund.</p> <p>NSF is satisfied with the language as-is and note that the language is in compliance with the following language from 2 CFR 200.307(e): "When the Federal awarding agency authorizes the approaches in paragraphs (e)(2) (ADDITIVE) and (3) (COST SHARING OR MATCHING) of this section, program income in excess of any amounts specified must also be deducted from expenditures."</p> |
| 62 | NSF OIG | Research Security | IX.C | IX-4 | <p>"By fostering transparency, disclosure and other practices that reflect the values of research integrity, NSF is helping to lead the way in ensuring taxpayer-funded research remains secure."</p> <p>NSF should include an additional disclosure requirement that requires the awardee to notify NSF OIG of certain violations of criminal or civil law. For example, the Federal Acquisition Rule 52.203-13 requires a government contractor to timely disclose, in writing, to the agency Office of Inspector General whenever the contractor has credible evidence that a principal, employee, agent, or subcontractor of the contractor has committed a violation of the Civil False Claims Act or a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity in connection with the award, performance, or closeout of a government contract or any related subcontract. The individual making the report must be an officer or manager empowered to speak for the company. A copy of the disclosure report must also be sent to the government contracting officer for the contract.</p> <p>The disclosure requirement continues until at least 3 years after final payment on the contract. Knowing failure on the part of a contractor to make such a required disclosure could be a cause for suspension and/or debarment until 3 years after final payment on the contract. FAR 9.406-2(b)(1)(vi) and 9.407-2(a)(8).</p> | Thank you for your comment. Given that this would constitute a policy change, it would require more internal and external communication, including posting in the Federal Register for public comment, prior to implementation. |
| 63 | NSF OIG | Endangered Species Act | II.D.2.i(v) | II-28 | <p>Text here mentions NSF compliance with Endangered Species Act (which is due to its role as a funder under provisions that affect only Federal agencies, (i.e., Section 7 of the ESA, which affects Federal agencies but not directly recipients who are not Federal entities) but nowhere in this section or elsewhere in PAPPG does it mention how NSF ensures the recipient's compliance with Endangered Species Act (recipient needs a permit from U.S. Fish and Wildlife Service or National Marine Fisheries Service (NMFS) to do research on an Endangered Species or that affects one) or for recipients who need a directed research permit from NMFS to be in compliance with the Marine Mammal Protection Act for research on a marine mammal, or an incidental take permit for research on something else that affects marine mammals. For other Federal laws related to human subjects or Animal Welfare Act the PAPPG does discuss how NSF ensures compliance so there is an inconsistency.</p> | In the applicable grant conditions, the Grantee Responsibilities and Federal Requirements term specifies that "By acceptance of this grant, the grantee agrees to comply with the applicable Federal requirements for grants and cooperative agreements and to the prudent management of all expenditures and actions affecting the grant including the monitoring of subrecipients (if applicable). Specific guidance on subrecipient monitoring and management can be found in 2 CFR §§200.331-332. A listing of National Policy Requirements the grantee must adhere to, where applicable is located at: https://nsf.gov/awards/managing/rtc.jsp ." |

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| 64 | NSF OIG | Human Subjects | II.E.5.b(iv) | II-35 | <p>If the project lacks definite plans regarding use of human subjects, their data or their specimens, pursuant to 45 CFR §690.118, the proposer must check the box for "Human Subjects" on the Cover Sheet and enter "Pending" in the space provided for the approval date. If available at the time of proposal submission, the determination notice should be uploaded as an "Other Supplementary Document". If the determination notice is not available, and, the decision is made to fund the proposal, a determination notice must be provided to the cognizant program prior to award.</p> <p>NSF will be flexible with the form that this notice takes, as long as it makes clear that no work with human subjects, including recruitment, will be conducted until full IRB approval is obtained. NSF will add conditions to the award that prevent any research involving human subjects from being carried out, or otherwise restrict the drawing down of funds, until IRB approval has been obtained. The PI may conduct preliminary or conceptual work that does not involve human subjects while the protocol is being developed or is under review, consistent with organizational guidelines.</p> <p>Will the "flexible form of notice" be in eJacket (so OIG has direct access)? Also, removing the requirement for renewed documentation after an IRB determination expires [see removed language below] will make it more difficult to determine whether IRB approval is ongoing, but perhaps this is not necessary if the primary responsibility lies with the institution?</p> <p>Language removed from the previous PAPPG included: "Prior to the expiration date specified in the determination notice, the AOR is required to provide to the cognizant NSF Program Officer: 1. verification that the project continues to lack definite plans for the involvement of human subjects, their data, or their specimens; or 2. documentation that demonstrates that IRB approval has been obtained. The determination notice must indicate that no work with human subjects, including recruitment, will be conducted until full IRB approval is obtained. NSF will add conditions to the grant that prevent any research involving human subjects from being carried out, or otherwise restrict the drawing down of funds, until IRB approval has been obtained."</p> | <p>NSF internal proposal processing requirements instruct the cognizant NSF Program Officer to include any determination notices or approvals in the NSF eJacket (EJ) if available at the time of submission, the document would be included in the Supplementary Documents section of EJ.</p> <p>It is not necessary that a determination notice establish an expiration date as it contradicts the new Common Rule's stipulation that continuing review is not required for most projects. This is why that language was removed. Institutions are still welcome to establish their own expirations and parameters as the IRBs see fit. And indeed, the primary responsibility of monitoring the human subjects activities of the PI lies with the awardee organization.</p> |
| 65 | Penn State Research Community | Global Comment | N/A | N/A | <p>Through out the document, Penn State highlights sections that we believe should be labeled as "MUST" and not SHOULD". Support and clarity to the PI's is important. Please note Per UG 200.101, which states: "Throughout this part when the word "must" is used it indicates a requirement. Whereas, use of the word "should" or "may" indicates a best practice or recommended approach rather than a requirement and permits discretion."</p> <p>1) P. x: "...the Grants.gov Application Guide should (must) be followed..." 2) P. I-3: "Proposers that plan to submit a collaborative proposal from multiple organizations should (must) submit a single LOI for the entire project." 3) P. I-4: "The full proposal should (must) represent the..." 4) P. I-4: "It should (must) present the intellectual merit and broader impacts..." 5) P. I-5: "Authors other than the PI (or any co-PI) should (must) be named..." 6) P. I-8: "Proposers should (must) contact the cognizant NSF Program Officer..." 7) P. I-8: "A statement identifying the nature of the event that impacted the ability to submit the proposal on time should (must) be uploaded... If available, written approval from the cognizant NSF Program Officer also should (must) be uploaded..." 8) P. I-10: "Proposers should (must) allow up to six months for..." 9) P. II-4: "Each section of the proposal that is uploaded as a file should (must) leave out page numbering..." 10) P. II-7: "This information should (must) be submitted as a single copy document and uploaded..." 11) P. II-8: "The requested start date should (must) allow at least six months for NSF review..." 12) P. II-10: For each proposal that describes an international activity, proposers should (must) list the primary countries.... Proposers also should (must) enter the country/countries..." 13) P. II-11: "...and education products should (must) be described in the Special Information and Supplementary..."</p> | <p>Where appropriate, language has been modified.</p> |
| - | Penn State Research Community | Global Comment | N/A | N/A | <p>14) P. II-14: "...they should (must) be removed from Section A of the budget." 15) P. II-17: "Human subject payments should (must) be included on line G.6..."16) P. II-19: "...payments to human subjects or incentives to promote completion of a survey, should (must) be included on line G.6..." 17) P. II-19: "The amount for indirect costs should (must) be calculated by applying the current negotiated indirect cost rate(s) to the approved base(s) and such amounts should (must) be specified..." 18) P. II-28: "...and proposals that include subawards are a single unified project and should (must) include only one supplemental..."</p> | <p>Where appropriate, language has been modified.</p> |
| 91 | Penn State Research Community | Global Comment | N/A | N/A | <p>Commenter recommended numerous editorial changes throughout the document such as identifying extra spaces and comma usage.</p> | <p>Thank you for your comment.</p> |
| 92 | Penn State Research Community | BAAM | I.A. | I-1 | <p>With research.gov just now being completely rolled out, it doesn't seem to make sense to introduce another new proposal system. Why can't this be done in research.gov?</p> | <p>Research.gov does not allow for the use of Contracts, and other arrangement. Research.gov is currently designed for financial assistance proposals (grants and cooperative agreements) which constitute the majority of NSF funding opportunities and associated proposals. NSF choose to create the Broad Agency Announcement Management site (BAAM) as a streamlined application and submission system to make it easier to proposer types that are not familiar with submitting proposals to NSF. BAAM supports NSF's use of broad agency announcements, or BAAs, as a new form of funding opportunity. The BAA can be broad in its offering and NSF can choose to fund proposals as grants, cooperative agreements, contracts, or other arrangements; and each BAA will specify the award type. The goal of using BAAs, is to engage new communities of scientists and engineers, including those who may be working beyond institutions of higher education, such as in industry, nonprofits; state, local and tribal governments; civil society; and communities of practice and other organizations. NSF's use of BAAs supports the goal of broadening participation of smaller institutions and groups new to NSF. The BAAM system is not designed to replace Research.gov but provide another opportunity.</p> |
| 93 | Penn State Research Community | Proposal Processing | I.H | I-10 | <p>"Proposers should allow up to six months for programmatic review and processing (see Chapter III for additional information on the NSF merit review process). In addition, proposers should be aware that the NSF Division of Grants and Agreements generally makes awards within 30 calendar days after the program division/office makes its recommendation." Unless the solicitation specifies otherwise.</p> | <p>This is the standard for the entire NSF proposal and award process, and further amplification is not necessary.</p> |
| 94 | Penn State Research Community | Proposal Font, Spacing and Margin Requirements | II.C.2.a | II-4 | <p>Using Arial 10-point font generates a warning in research.gov every time a document with it is uploaded, saying that it might exceed 6 lines per inch which might cause the proposal to be rejected. Why not make it an 11-point minimum? This warning is always jarring to PIs.</p> | <p>NSF is clearly articulating the font requirements and providing a warning when the PI is in danger of violating those requirements which could result in nonacceptance of the proposal.</p> |

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| 95 | Penn State Research Community | Proposal Font, Spacing and Margin Requirements | II.C.2.a | II-4 | Please make the font minimum 11 point. This will avoid confusion with the PI's and research teams. | Thank you for your comment. |
| 96 | Penn State Research Community | Senior Personnel Documents | II.D.2 | II-7 | See reference in footnote #11: Check/confirm (is "II.D.2.ij" correct?) | Language has been modified. |
| 97 | Penn State Research Community | Requested Start Date and Proposal Duration | II.D.2.a | II-8 | "The requested start date should allow at least six months for NSF review, processing, and decision, unless the solicitation specifies otherwise. " | This is the standard for the entire NSF proposal and award process, and further amplification is not necessary. |
| 98 | Penn State Research Community | SciENcv | II.D.1.e | II-7 | Requiring Biosketches to only be generated in SciENcv could place too much burden on PIs and senior personnel to learn a new process with short notice, so we ask that the use of a pdf template be made optional for 2023 and then mandatory for 2024 | <p>The use of SciENcv for the creation of NSF-required biographical sketch and current and pending support documents is a vast improvement for researchers over the static, NSF fillable formats. The benefits include:</p> <ul style="list-style-type: none"> - Pre-population of data: By linking accounts to ORCID, proposers may see a reduction in the administrative burden associated with preparing these sections of the proposal. - Ability to have multiple versions: Proposers can easily access multiple versions of the NSF-required documents and customize them to align with the requirements of a specific funding opportunity. - Ensures compliance with current NSF policy: Use of SciENcv ensures that proposers are using a compliant version of the biographical sketch and current and pending support documents. <p>In addition, the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Section 223(a)(1) (42 USC 6605(a)(1)) requires all senior personnel identified on a proposal submitted to NSF to certify that the information provided in their Biographical Sketch and Current and Pending Support documents are accurate, current, and complete. SciENcv has developed an electronic signature mechanism that will meet this statutory requirement and ensure NSF compliance with this requirement. Other agencies that use SciENcv also will use this mechanism to collect the requisite electronic signature.</p> <p>NSF does understand, however, that mandatory use of SciENcv will require organizations to train researchers to ensure implementation of this new requirement. To provide sufficient time for such training, NSF will be extending the implementation for THIS requirement in the 2023 PAPPG until October 2023. The specific date will be announced to the NSF proposer community when available.</p> |
| 99 | Penn State Research Community | SciENcv | II.D.1.e | II-7 | Requiring Current & Pending to only be generated in SciENcv could place too much burden on PIs and senior personnel to learn a new process with short notice, so we ask that the use of a pdf template be made optional for 2023 and then mandatory for 2024. The pdf version could be certified by each individual by using Adobe Sign. | <p>The use of SciENcv for the creation of NSF-required biographical sketch and current and pending support documents is a vast improvement for researchers over the static, NSF fillable formats. The benefits include:</p> <ul style="list-style-type: none"> - Pre-population of data: By linking accounts to ORCID, proposers may see a reduction in the administrative burden associated with preparing these sections of the proposal. - Ability to have multiple versions: Proposers can easily access multiple versions of the NSF-required documents and customize them to align with the requirements of a specific funding opportunity. - Ensures compliance with current NSF policy: Use of SciENcv ensures that proposers are using a compliant version of the biographical sketch and current and pending support documents. <p>In addition, the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Section 223(a)(1) (42 USC 6605(a)(1)) requires all senior personnel identified on a proposal submitted to NSF to certify that the information provided in their Biographical Sketch and Current and Pending Support documents are accurate, current, and complete. SciENcv has developed an electronic signature mechanism that will meet this statutory requirement and ensure NSF compliance with this requirement. Other agencies that use SciENcv also will use this mechanism to collect the requisite electronic signature.</p> <p>NSF does understand, however, that mandatory use of SciENcv will require organizations to train researchers to ensure implementation of this new requirement. To provide sufficient time for such training, NSF will be extending the implementation for THIS requirement in the 2023 PAPPG until October 2023. The specific date will be announced to the NSF proposer community when available.</p> |
| 100 | Penn State Research Community | Collaborators and Other Affiliations | II.D.2.h(iii) | II-26 | It was mentioned on page 33 above that the COA is one of the three documents that must be certified by key personnel, but there is nothing about certification in this section. | Language has been modified to remove the certification requirement for the Collaborators and Other Affiliations document. |
| 101 | Penn State Research Community | Documentation of Collaborative arrangements of significance | II.D.2.i(iv) | II-28 | "Letters of collaboration should be limited to stating the intent to collaborate and should not contain endorsements or evaluation of the proposed project." If it is not required, then how much leeway is there? It seems safest to make this format required, in order to avoid letters of support being written as letters of collaboration. | Language has been modified. |
| 102 | University of Colorado Boulder | Current and Pending Support | II.D.2.h(ii) | II-24 | After thorough review of the proposed changes to the 23-1 PAPPG, the University of Colorado Boulder would like to register a concern regarding the upcoming change to post-submission/pre-award Current and Pending Support documentation. The Research Administrator/AOR burden for having to create and submit a proposal file update for every awarded project will be significant (granted, a great problem to have, since we're being awarded, but a burden nonetheless). Additionally, the AOR's priority is always for submission deadlines; PFUs would be next in line, but a delay is possible especially given how tightly staffed most organizations are right now. | NSF understands that mandatory use of SciENcv will require organizations to train researchers to ensure implementation of this new requirement. Based on the feedback received, NSF will be extending the implementation for THIS requirement in the 2023 PAPPG until October 2023. The specific date will be announced to the NSF proposer community when available. |