

Number	Comment Source	Topic	PAPPG Reference(s)	PAPPG Page Numbers	Comment	NSF Response/Resolution
1	Amherst College	Synergistic Activities	II.C.2.h(iv)	II-32	Creating separate documents increases the workload of research admins who now have to ensure not only their own PI's complete this, but also any subawards. Leaving this within the Biosketch reduces that burden.	
2	University of Arizona	Salaries and Wages	II.D.2.f(i)(a)	II-14	<p>The first paragraph of this section basically states that the NSF expect cost share through that portion of a faculty's normal 9-month appointment that supports research. This is a misinterpretation of the intent of the research portion of a tenured/tenure track faculty position. The research portion of a faculty appointment is directed toward investigating new avenues of research, gathering pilot data for future grant applications, training new students, writing grants, complying with ever-increasing regulations related to conduct of sponsored projects, etc. A faculty appointment is now consumed with these activities and it is unreasonable for NSF to expect faculty to cost share this time. If the NSF wants faculty and institutions to cost share on sponsored projects, they should ask for it instead of hiding it in this policy.</p> <p>Case and point is the second paragraph, which states that the NSF limits the salary it will pay to two months. There is an exception stated, but as a practical matter, program managers leverage this language in the PAPPG, sometimes in exploitive ways such as holding out this section before making a final award decision. In fact, some have gone so far as to tell the faculty that they will hold up an award decision until the faculty is compliant with the "two-month rule". That is not what this section states, and to misrepresent it is unethical. Lastly, this form of cost share creates massive inequality that NSF needs to consider. Wealthier institutions that can afford to underwrite NSF-funded projects can compete better for funding, which those that cannot afford to pay their faculty to run NSF projects cannot. In this era of vast inequity bet ween academic institutions, NSF needs to consider this policy, its language and implementation, and the consequences on universities.</p> <p>If NSF is requiring cost share, state it, require it, and enforce it. Continuing to hide it is a farce that creates an uneven playing field. If NSF would like to address this hidden (not so hidden) cost to institutions, the language should be made more clear. Here is a suggestion:</p> <p>NSF regards research as one of the normal functions of faculty members at institutions of higher education but appreciates that institutional resources support many activities under these function. As such, resources dedicated to research are spread thin at many institutions and may not be available to support and augment the conduct of NSF-funded projects. When reasonably available, compensation for time normally spent on research within the term of appointment is deemed to be included within the faculty member's regular organizational salary. When such subsidization of NSF-funded research is not possible, organizations should seek relief from the two-month salary guideline as described below. NSF Program Managers should encourage the use of this exemption, when warranted, in order to create equity in the ability of all institutions to participate in NSF-funded programs.</p>	Thank you for your comments. NSF implemented the National Science Board's report entitled, "Investing in the Future: NSF Cost Sharing Policies for a Robust Federal Research Enterprise" (NSB 09-20, August 3, 2009). In accordance with this policy, the determination was made to not address the two month policy as part of this activity. Since implementation of the cost sharing report, the two month policy has been discussed with the NSB and only minor clarifications were incorporated. As such, no changes are envisioned to this language at this time.
3	Case Western Reserve University	Budget	II.D.2.f(i)(a)	II-14	Would the NSF reconsider adding a budget template to the available documents to applicants? As the Baby Boomers are retiring and with the Great Resignation, grants specialists can be relatively new and unseasoned. We have found, here at our R1 Institution, a real interest on the part of young and new faculty to have a PDF budget template like the one used by the NIH. It acts as a guide in ways that an Excel budget sheet (depending on Macros) doesn't. See at this URL: https://grants.nih.gov/grants/how-to-apply-application-guide/forms-e/general/g.300-r&r-budget-form.htm It really seems to help the early faculty focus their budgeting skills. Thank you for your consideration.	Thank you for your comment. NSF considers the web form to have the highest usability, providing thorough, real-time feedback to the user. NSF provides additional instruction on entering proposal budgets at: https://resources.research.gov/common/attachment/Desktop/How%20to%20Enter%20Proposal%20Budgets_Final_508.pdf . NSF welcomes specific feedback on how we can improve the usability of the web form, as well as improve the instructions.
4	Anonymous	Synergistic Activities	II.C.2.h(iv)	II-32	Is it really necessary to split the synergistic activities from the biographical sketch thereby requiring an additional document to be handled and uploaded to the application? Since it seems the biosketch is no longer going to be limited to 3 pages, why not leave the synergistic activities in there. PIs are already accustomed to having it there and this represents another significant change to the sciENcv portal. For large proposals, this increases the document burden (i.e. 30 senior personnel = 90 docs but would go to = 120 docs).	Thank you for your comment. NSF is committed to use of the Biographical Sketch Common Form. When implemented by the Foundation, it will contain only the categories specified in the Common Form itself. In order to ensure that we can eliminate the page limitation, it will be necessary to have a separate upload of one page with no formatting instructions. The other option is to create a new form in SciENcv to collect this information and we believe that this will be more administratively burdensome.
5	Bucknell University	RUI and ROA proposal types	II.F.5 II.F.6	II-49	The inclusion of RUIs and ROAs as types of proposals is excellent, and will hopefully broaden knowledge of these opportunities amongst the research community AND NSF rotators who come from R1 institutions. However, the instructions included regarding use of the RUI in the title for only the RUI-eligible institution in a linked collaborative does not seem to be technically feasible in research.gov. In linked collaborative proposals that my institution submitted after 1/30/23, and as recently as 3/24/23, the solicitation and title were drawn from the lead institution (for the purpose of submitting). When we acted as the lead, the two non-RUI eligible institutions ended up with RUI in the title. When we were not the lead, we were unable to change the title or use the 14-579 solicitation.	Thank you for your comment. NSF is evaluating a potential system enhancement such that collaborative proposals would not inherit the proposal title after they have been linked and the non-leads could update the proposal title for RUIs.
6	Texas A&M University	Institutions of Higher Education	I.E.1.a	I-6	<p>a) Institutions of Higher Education (IHEs) Two- and four-year IHEs (including community colleges) accredited in, and having a campus located in the U.S., acting on behalf of their faculty members. IHEs located outside the U.S. fall under paragraph 6, below.</p> <p>I think it would be clearer if the reference was to: "paragraph (c) Foreign Organizations below."</p>	Thank you for your recommendation. Your comment has been incorporated.
7	Texas A&M University	Property Management Standards	IX.E	IX-5	<p>For all other awards, such equipment is considered "exempt property" as outlined below and in accordance with the applicable award terms and conditions.</p> <p>Clarify is the "exempt property" referring to the definition under 200.312 Federally owned and exempt property. If so perhaps provide that 2CFR reference and/or the definition.</p> <p>2CFR 200.312 (c) Exempt property means property acquired under a Federal award where the Federal awarding agency has chosen to vest title to the property to the non-Federal entity without further responsibility to the Federal Government, based upon the explicit terms and conditions of the Federal award. The Federal awarding agency may exercise this option when statutory authority exists. Absent statutory authority and specific terms and conditions of the Federal award, title to exempt property acquired under the Federal award remains with the Federal Government.</p> <p>To me the disposition of the equipment could be more clearly stated. Is the intent that unless NSF issues disposition instruction no later than 120 days after the end of the NSF supported project for which it was required the non-federal entity has no further responsibility to the government and can dispose of it without accounting to the government? I believe this is the case but again perhaps could be made clearer.</p>	Thank you for your recommendation. The opening language in Chapter IX.E incorporates the entire property management standards coverage in 2 CFR 200, including exempt property. As such, an additional reference is not required.
8	Ken Mankoff	Collaborators and Other Affiliations	II.D.2.h(iii)	II-31-32	<p>I am an advocate of open science. I not only release some data when I publish a paper, but I prefer to do all of my work following open science principles. I only use open source software, and my laptop runs Linux. Everything I do is open source on GitHub.</p> <p>The PAPPG requirements for listing collaborator has become onerous. It used to be a list that I could maintain in my own preferred tool and then share as a text file. It is now an Excel spreadsheet with macros embedded. I am, just barely, able to get things to work in LibreOffice, but this spreadsheet seems to push the limits of that software. It is slow and crashes often - not something that software usually does when I use it to work on XLS spreadsheets.</p> <p>Please consider simplifying the collaborator spreadsheet, and keep it simple. XLS macros are not.</p>	Thank you for your comment. Currently there are no plans to modernize the current format and move away from the XLS macros. Unfortunately, as of January 30, 2023, due retirement of Fastlane as a submission option, LibreOffice and Google Sheets are no longer supported. If an applicant needs assistance in creating this file using supported software, it can be accommodated through a help desk ticket, however due to limited resources, allow up to five business days to complete.

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9	Lee Kauvaka	Tribal Nations	II.E.10	II-43	<p>The United States through the State of Hawai'i is an entity contracting with NSF via the University of Hawai'i. The United States defense forces are illegally occupying the legal entity of the Hawaiian Kingdom, an independent state which has existed since 1843. The United States congress jointly resolved through public law in 1993 an apology to the Hawaiian people for the illegal occupation and overthrow of their sovereign government (Public Law 103-150 103d Congress - See Attached). The Hawaiian people were never a tribal people and have no agreement with the U.S. making them so.</p> <p>While NSF's TCUP grant program include State of Hawai'i eligible institutions of higher education which are entities identified under the State of Hawai'i as public institutions, none of the elements here in these revisions to PAPPG regarding tribal authorities applies to the higher education institutions in the State of Hawai'i. Therefore, the interests of the Hawaiian people, are not as a tribal people, but as a nation state deprived of their liberty, land, and state government (a constitutional monarchy). The Acting Council of Regency of the Hawaiian Kingdom is the governing authority PIs in Hawai'i need to address permissions.</p> <p>On page II-43 the wording needs to be changed to have PIs get permission from the "Acting Council of Regency of the Hawaiian Kingdom" not "Tribal Government". The line beginning, "Seeking and Obtaining Tribal Nation Permission" should read "seeking and obtaining independent state permission for Proposals for Proposals May Impact National Resources or Interests Prior to submission of a proposal that may impact the resources or interests of an independent foreign state" and NSF lawyers should look at the implications NSF has for contributing to the war crimes under the laws of occupation in the Hague Conventions which the United States ratified. Please refer to "WAR CRIMINAL REPORT (3257 NO. 22-0007" See Attached).</p>	Thank you for your comment.
10	Anonymous	Tribal Nations	II.E.10	II-43	<p>I am concerned about the impact of section E.10, in particular this sentence: "the participation of Tribal citizens as human subjects in a study (note that this type of proposal may also require a separate Tribal IRB)" This has potential negative impact on tribal members/enrollees who live off reservation who might chose to participate in research (as an individual, not as a tribal representative).</p> <p>My concern is about how this language could affect educational research, especially off the reservation. At best, it needs nuance or clarification for this sort of context, both informal (museums, etc) and Pre-K-12 formal classrooms. It can be read in a way that could exclude, or make very challenging, research including tribal enrollees, again, especially off the reservation and in contexts with members of multiple Nations (think San Francisco, Denver, Phoenix, etc.). For example, would a researcher have to get tribal authorization for every participant who may choose to enrolled participate in a study, even if in a diverse urban setting? If I am doing a museum study using people who attend museums on a given day, would I have to screen for tribal membership (for example: literally get their enrollment number) and then exclude those people because of the arduous special permissions implied by this policy (e.g., asking each Tribal Nation for permission for each individual participant)? If a tribal member (especially off-reservation) wants to participate and is informed, can the tribe tell them they can't? The ultimate impact could be excluding Tribal enrollees from research rather than ethically including them when we need more representation, not less. Further, it places tribal members who chose to participate in research in a very precarious, bureaucratic and awkward situation.</p> <p>I suggest considering the ramifications of this language and a more precise and nuanced alternative be crafted to ensure that tribal citizens who are not specifically representing tribal interests or knowledge not be subject to tribal consent for participating in research...especially in cases where the data is not dis-aggregated down to specific Tribal Nations.</p>	<p>Thank you for your comments. Regarding your concern about tribal members/enrollees who live off reservations who might chose to participate in research as individuals, we agree that clarification is warranted. When the PAPPG is officially implemented, its application will be initially limited to Tribal lands or those aspects of Tribal life that are within the domain of the Tribal Nation (as opposed to individual Tribal members), including but not limited to Tribal languages and subsistence rights on Tribal Nation lands.</p> <p>For proposed research that works with Tribal Nation members, the PI will need permission from the Tribal Nation if the PI seeks to invoke the Tribal Nation in any way (including but not limited to materials, public forums, or publications). The Tribal Nation that gives the permission may also require Tribal IRB depending on the role the Tribal members may play. If Tribal members (enrolled citizens whether urban or reservation living) voluntarily participate, they can do so but will not be considered as a Tribal representative.</p>
11	FASEB	General Comment	N/A	N/A	<p>As NSF prepares to fulfill the directives within "Ensuring Free, Immediate, and Equitable Access to Federally Funded Research," issued by the White House Office of Science and Technology Policy (OSTP) to the Heads of Executive Departments and Agencies issued by in August 2022, FASEB encourages broad stakeholder engagement to ensure updates for the 2025 PAPPG clearly articulate all options available to researchers to meet the requirements of the updated NSF public access policy. Similarly, once proposed updates to NSF's public access plan are released to the research community, we strongly encourage NSF to incorporate discussions regarding likely updates to the PAPPG to ensure alignment and clearly articulate expectations for grant applicants and awardees in this core resource.</p>	Thank you for your comment. NSF will take this under consideration.
12	Amanda Thomas	Synergistic Activities	II.C.2.h(iv)	II-32	<p>The language in the draft PAPPG 24-1 for the new 'Synergistic Activities' document references that this document is to be uploaded in the 'Supplementary documentation' section. However, based on other guidance in the PAPPG, it appears this would instead be uploaded in the Senior Personnel Documents section. I would recommend that the language be adjusted a bit so as not to cause confusion on where this new document will need to be uploaded. "These documents must be uploaded under "Synergistic Activities" in the supplementary documentation section of Research.gov." Recommended update: If it will be an upload for each Senior Personnel; "These documents must be uploaded under "Synergistic Activities" in the Senior Personnel Documents section of Research.gov." If the Synergistic Activities document will need to be combined for all Senior Personnel and uploaded under the Supplementary Documents section instead. I would recommend the draft PAPPG 24-1 be updated to clarify this and list this requirement in the Supplementary Documents section instead of the Senior Personnel Documents section. Thank you for the consideration!</p>	Thank you for your comment. The update has been incorporated.
13	Duke University and the Lumbee Tribe of North Carolina	Tribal Nations	I.E.1.c	I-6	<p>Our group comprises one Lumbee academic and two tribal administrative professionals who are concerned about proposed changes to the PAPPG that impact American Indian tribes and Indigenous groups. Academic institutions throughout the United States have long histories of extracting knowledge and material from Indigenous communities. In the process of doing so, researchers have advanced their own careers and brought prestige and financial benefits to themselves and to the institutions they represent. Often, Indigenous communities experienced no direct benefits from these research projects. In some cases, Indigenous communities experienced serious harm resulting from extractive research. The Lumbee Tribe of North Carolina (LTNC) has experienced many decades of extractive research in our community, including research that has advanced harmful stereotypes, including stereotypes about American Indians in general and stereotypes about Lumbee people in particular. Key examples of extractive research and its harmful effects on Lumbee people are summarized in a peer-reviewed article by Lumbee tribal members Ryan Emanuel and Karen Bird published recently in Southern Cultures. After summarizing these examples, Emanuel and Bird observe that extractive research "can fuel a vicious cycle of harm that elevates colonial myths and diminishes the perspectives and voices of Indigenous peoples.</p> <p>With this in mind, we take great interest in proposed changes by the National Science Foundation (NSF) to the PAPPG aimed at promoting meaningful and productive engagement with federally recognized American Indian tribes and with other Indigenous peoples of the United States. The LTNC is in a singularly unique position among tribes and Indigenous peoples because the US formally recognized Lumbee people as American Indians in 1956, but Congress simultaneously prohibited a government-to-government relationship between the federal government and the tribe. As a result of the tribe's unique status, the LTNC could be impacted by NSF's policies on tribal engagement in the same way that most non-federally recognized tribes could expect to be impacted.</p> <p>As a matter of equity and justice, NSF should expand its policies to be inclusive of nonfederally recognized tribes. In particular, Section E.5 should be expanded to ensure that non-federally recognized tribes are eligible to submit proposals to NSF. One outcome of this expanded policy is that non-federally recognized tribes will be able to advance their own research and education agendas on their own terms and according to priorities that they view as important.</p>	<p>Thank you for your comment. The intent of this provision is to ensure Tribal Nation interests and resources are respected and to encourage early engagement and meaningful collaboration with the Tribal Nation(s).</p> <p>NSF acknowledges your concern about non-inclusion of Indigenous communities and nonprofit organizations that are not federally recognized in this proposed language. NSF recognizes that there are challenges to including these Indigenous communities but continues to explore implications of what such a change would mean, to both NSF and the Tribal Nations.</p>
14	Duke University and the Lumbee Tribe of North Carolina	Tribal Nations	II.E.10	II-43	<p>Section E.10 should specify that PIs need to obtain permission from nonfederally recognized tribal governments whenever NSF-funded activities impact Indigenous knowledges, tribally controlled data, or other resources pertaining to specific non-federally recognized tribes. Moreover, the same expectations by NSF that PIs must obtain tribal IRB approvals should apply whenever PIs engage with non-federally recognized tribes that operate IRBs. Notably, language in the draft PAPPG would not require NSF-funded PIs to obtain permission from the LTNC for research that impacts the tribe, and the draft language would also excuse PIs from following the tribe's existing IRB protocols. Regardless of whether a PI's work impacts federally recognized or nonfederally recognized tribes, NSF should require the PI to submit documentation of permission, formal collaboration, etc. as supplementary information to a proposal.</p>	Thank you for your comment. NSF acknowledges your concern about non-inclusion of Indigenous communities and nonprofit organizations that are not federally recognized in this proposed language. NSF recognizes that there are challenges to including these Indigenous communities but continues to explore implications of what such a change would mean, to both NSF and the Tribal Nations.
15	Duke University and the Lumbee Tribe of North Carolina	Tribal Nations	II.E.10	II-43	<p>In cases where no singular governing body exists or is authorized to speak on behalf of an Indigenous community that would be affected by proposed research, NSF should require the PI to describe the situation in the Project Description. Specifically, PIs should be expected to describe the nature of their engagement with any Indigenous group(s) named in their proposal, including protocols for obtaining free, prior, and informed consent from the group. PIs should clarify whether the work pertains to individuals who happen to belong to a particular Indigenous group, or whether the work applies to the Indigenous group as a collective.</p>	Thank you for your comment. NSF acknowledges your concern about Indigenous communities, including those that may not have a governing body authorized to speak on behalf of the community. NSF recognizes that there are challenges to including these Indigenous communities but continues to explore implications of what such a change would mean, to both NSF and the Tribal Nations.

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16	Duke University and the Lumbee Tribe of North Carolina	Tribal Nations	N/A	N/A	Information supplied by PIs that describes proposed engagement with (or impacts to) tribes or Indigenous peoples should be subject to NSF merit review criteria. Information subject to merit review should include supplementary documents demonstrating tribal permission, collaboration, etc., as well as portions of the Project Description that elaborate on tribal engagement or impacts, including material recommended in item (3) above. To accomplish this, NSF will need to rely on a pool of reviewers and panelists who are qualified to evaluate meaningful engagement with Indigenous groups, research impacts to Indigenous peoples, extractive research practices, etc. To this end, NSF could consider engaging Tribal Historic Preservation Officers or other tribal staff as experts who can evaluate these aspects of proposals – either as ad hoc reviewers or as panelists	Thank you for your comment. Regarding your request that PI's engagement activities undergo merit review, NSF acknowledges that Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission.
17	Duke University and the Lumbee Tribe of North Carolina	Tribal Nations	N/A	N/A	Given that proposed changes to the PAPPG could increase the burden on tribal staff to respond to requests from PIs, NSF should support capacity-building and expertise building within and among tribal governments. By funding proposals (including tribally led proposals) that build such expertise and capacity, NSF can help foster an environment in which tribes and Indigenous peoples can engage with academics in ways that are generative and co-beneficial rather than extractive. NSF should consult with tribes and Indigenous groups to determine whether and how these types of proposals fit within existing directorates and programs, and/or whether new kinds of solicitations are needed to facilitate this important and potentially transformative work.	Thank you for your comment. Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission. The intent of this provision is to ensure Tribal Nation interests and resources are respected and to encourage early engagement and meaningful collaboration with the Tribal Nation(s).
18	Duke University and the Lumbee Tribe of North Carolina	Tribal Nations	N/A	N/A	Our recommendations are aimed at helping NSF to promote Indigenous sovereignty and self-determination through the agency's mission of funding PIs to conduct innovative and impactful science. Another goal of our recommendations is to help NSF move away from situations in which the Intellectual Merits or Broader Impacts of proposals rely on ambiguous or unsubstantiated claims about "working with" Indigenous peoples, their cultures, or their knowledge systems. These situations open the door for continued extractive practices. NSF expects PIs to describe and explain many important aspects of their proposed research – including technical methods, research objectives, and management plans. The agency should expect no less from PIs when it comes to describing and documenting their work with or impacts to Indigenous peoples.	Thank you for your comment. The intent of this provision is to ensure Tribal Nation interests and resources are respected and to encourage early engagement and meaningful collaboration with the Tribal Nation(s).
19	Native American Fish and Wildlife Society - Research and Publications Committee	Tribal Nations	II.E.10	II-43	"c. Any proposal for NSF funding that may impact Tribal resources or interests must: (i) Check the box on the Cover Sheet entitled "Potential Impacts on Tribal Nations" if, pursuant to the above, the proposal may impact the resources or interests of a Tribal Nation." The committee finds issues with the above section. Who/ What entities determine whether a project affects Tribal land, resources, and interests? If a researcher is conducting studies adjacent to Tribal land but self-determines the affect on identified Tribes resulting in an unchecked box, does this bypass the system and notification to the Tribe? Alterations including short- and long-term research conducted adjacent to Tribal land, may affect the landscapes, wildlife, and resources that may be vital to Tribal health and sovereignty. Someone within NSF needs to have intricate and delicate historic knowledge to determine if a project 'MAY impact' Tribal nations. There needs to be a concerted effort to determine what falls under the 'MAY impact' statement.	Thank you for your comment. NSF acknowledges your concerns about the identification of potential impacts on Tribal Nations. When the PAPPG is officially implemented, its application will be initially limited to Tribal lands or those aspects of Tribal life that are within the domain of the Tribal Nation (as opposed to individual Tribal members), including but not limited to Tribal languages and subsistence rights on Tribal Nation lands. NSF also acknowledges your concern about NSF oversight of this requirement; NSF has procedures in place to address a situation in which a proposer/awardee has not complied with an NSF requirement, such as seeking permission from a potentially impacted Tribal Nation.
20	Native American Fish and Wildlife Society - Research and Publications Committee	Tribal Nations	II.E.10	II-43	"(ii) Include one of the following: (a) a copy of the written request to the relevant Tribe(s) to carry out any proposed activities/activity that require(s) prior approval from the Tribal Nation(s); (b) written confirmation from the Tribal Nation(s) that review and approval is not required; (c) written permission from the Tribal Nation(s) to engage in an initial phase for planning collaboratively; or (d) a copy of a document from the relevant Tribal Nation(s) that provides the requisite approval." The above statement is of major concern to the NAFWS Research and Publications committee. What is the accountability process for this 'Tribal approval' process? Will there be a designated department or individual to verify that the aforementioned "written request" has been delivered and collaborated with the identified Tribes. There is a need to establish a timeline for applicants to submit written requests that is appropriately established and enforced in collaboration with NSF and Tribes. There is a need to establish Tribal approval before funding is approved and distributed by NSF to the applicant. The NAFWS research and publication committee suggests applicants receive approval before submitting an application as well as a review at either 3-months or 6-months with both the applicant and the Tribe/s. Additionally, determination of who the Tribal letter comes from is essential. Would it be appropriate for a single Tribal member, or would this application have to be approved by Tribal council/committee? It is of note that it may be easy to find one individual who approves a project, but it would be more valuable and representative of overall Tribal interests to request a letter from a council. It is important to be collaborative with the 'tribal nation' and not one single individual.	Thank you for your comment. The intent of this provision is to ensure Tribal Nation interests and resources are respected and to encourage early engagement and meaningful collaboration with the Tribal Nation(s). NSF acknowledges your concern about accountability; NSF is open to consultation with federally recognized Tribal Nations who have concerns about potential impacts on a particular resource. Regarding concerns about timelines, please note that there are no timelines associated with this new language and Tribal Nations can follow whatever timeline works best for them. Your comment also includes a question about who the permission should come from. Please note that, Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission.
21	Native American Fish and Wildlife Society - Research and Publications Committee	Tribal Nations	II.E.10	II-43	Another major concern of the NAFWS Research Publications Committee involves implementation and ownership of the data that is collected. Who will own the data that is collected? Tribes should have access to any raw data collected by applicants that may impact their Tribal land. Tribes should be accredited appropriately and collaborated with through every phase of the research process including conversations regarding where the data should be used and what to be done with the data. Clear designation of what happens with used and unused data needs to be determined. As the government moves towards open data states where it is mandated that data becomes free-access, it is extremely important for any data to be protected under the sovereignty of Tribal Nations. Additionally, after the research is completed, it would be beneficial to produce a statement/report regarding how the research conducted and completed positively or negatively affects Tribe/s. We have often seen a lack of accountability from researchers regarding collaboration and results that have been promised to Tribes.	Thank you for your comment. Regarding your concern about data, Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership (which could require, for example, an MOU on data sovereignty/management) and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission.
22	Native American Fish and Wildlife Society - Research and Publications Committee	Tribal Nations	N/A	N/A	Tribal capacity is vital to consider when creating and implementing a timeline. Requesting proposal reviews of Tribes is burdensome labor and all Tribes capacity is different and each needs to be taken into consideration.	Thank you for your comment. NSF acknowledges your concern about burdens to Tribal Nations. As sovereign entities, they have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the assessment of fees to cover the cost of reviewing requests for permission. Regarding concerns about timelines, please note that there are no timelines associated with this new language and Tribal Nations can follow whatever timeline works best for them.
23	Native American Fish and Wildlife Society - Research and Publications Committee	Tribal Nations	II.E.10	II-43	Additional reflection and explanation on terms within E.10 should be considered, including: - "tribal nation"- when asking for Tribal approval does this refer to the governing council, or community, etc.? - "collaboration" - ("e. An exception to this requirement may occur when the proposal includes an initial phase for planning collaboratively with the tribe(s).") What does collaboration mean in this sense?	Thank you for your comment. The component or designated individual of the Tribal Nation responsible for reviewing and approving/disapproving permission to conduct research that potentially impacts tribal interests or resources is determined by the Tribal Nation. As sovereign entities, Tribal Nations have the authority to determine the process for reviewing such requests for permission to conduct research. The exception referenced in your comment has been removed from this provision.
24	Native American Fish and Wildlife Society - Research and Publications Committee	Tribal Nations	II.E.10	II-43	A clause should be implemented that allows the Tribe to back out of this agreement at any time as well as space for Tribes to comment if they are feeling misused throughout the process or agreed research period.	Thank you for your comment. Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the imposition of terms and conditions associated with approving requests for permission, including any agreements and/or termination clauses. There are also procedures in place to handle matters on a case-by-case basis.
25	Native American Fish and Wildlife Society - Research and Publications Committee	Tribal Nations	II.E.10	II-43	Needs to be in line and reflective of the White house Statement on Indigenous Knowledge free prior and informed consent UN protection for indigenous populations.	Thank you for your comment. The PAPPG provision is based on feedback from Tribal Nations and is in line with the January 2021 Presidential Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships and Executive Order 13175 of November 6, 2000 (Consultation and Coordination With Indian Tribal Governments).
26	Native American Fish and Wildlife Society - Research and Publications Committee	Tribal Nations	II.E.10	II-43	Exception- the exception needs to be clarified or taken out altogether. If this is just to allow extra time for planning, there should be a strict check-in process throughout that planning timeline.	Thank you for your comment. The referenced exception has been removed.

Number	Comment Source	Topic	PAPPG Reference(s)	PAPPG Page Numbers	Comment	NSF Response/Resolution
27	Native American Fish and Wildlife Society - Research and Publications Committee	Tribal Nations	II.E.10	II-43	There should be a clause that if the tribe has an established IRB, that should be the authoritative document that supersedes this.	Thank you for your comment. The intent of this provision is to ensure Tribal Nation interests and resources are respected and to encourage early engagement and meaningful collaboration with the Tribal Nation(s). Because a Tribal Nation's IRB would be limited (e.g., to human subjects), it may not cover all Tribal interests in a particular research activity, so permission from the Tribal Nation remains a necessary requirement. Further, Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources.
28	Native American Fish and Wildlife Society - Research and Publications Committee	Tribal Nations	II.E.10	II-43	There is a concern that as applicants perform research, they also have access to a large amount of Tribal information (cultural, TEK, etc.) that is not meant to be reported on and there needs to be an education process for applicants to understand cultural significance and how to work with Tribes.	Thank you for your comment. NSF acknowledges that in many cases PIs may come to the table lacking in education and cultural awareness. The intent of this provision is to ensure Tribal Nation interests and resources are respected and to encourage early engagement and meaningful collaboration with the Tribal Nation(s). In addition, Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission.
29	Bigelow Laboratory for Ocean Sciences	Tribal Nations	II.E.10	II-43	<p>Our institution welcomes the spirit of the changes in the PAPPG concerning prior informed consent of Tribal Nations for research that may occur on lands or impact resources or interests of Indigenous communities. We believe that Indigenous community consent to research that may impact those sovereign communities is important. Here, we highlight a few elements of the proposed changes to the PAPPG that we believe could benefit from more clarity, to minimize the burden on the NSF, proponents, and Indigenous communities.</p> <p>First, in order for proponents to have clarity on which regions or resources or interests within the USA may fall under the requirement for prior informed consent, we ask if the NSF or other federal agency will provide resources to identify the boundaries of these regions, resources and/or interests of federally-recognized Tribal Nations with the USA. This will minimize the burden on proponents to be able to accurately identify if the areas where they are proposing research require prior consultation, and also minimize the burden on Indigenous communities to have to repeatedly provide this information to prospective researchers. Likewise, we ask if the NSF will maintain a list of approved contacts for each Indigenous community from whom approval would meet the requirements for proposal sections 10C and 10D. Based on prior experience, we caution that the amount of effort/burden required to coordinate this oversight function may be underestimated for both the agency as well as Tribal Nations.</p> <p>Second, the proposed changes lack clarity on the burden of review within the "pre-proposal" stage. It is not clear who has the responsibility and authority to review these "pre-proposal" requests for research, what their expertise is to qualify them for decision making, and whether they are compensated for their efforts. For example, will NSF employ a tribal or regional facilitator for this purpose? Will the NSF provide defined restrictions on what terms like "resources" encompasses and who defines those interests, to guide the pre-proposal review? Likewise, it is not clear if such a pre-proposal review will necessarily require lengthening of the call for proposals, to enable sufficient time for effective pre-proposal review.</p> <p>Third, the proposed changes may bias against early-career investigators and/or investigators from under-represented groups who have not had the time or funding support to establish relationships with people in Indigenous groups and lands. Achieving prior informed consent requires relationship-building with Indigenous communities, which takes time and resources. The proposed changes lack clarity about how NSF will address this issue in the review of proposals, to ensure that individuals who are early-career, identify with under-represented identities, or are simply new to a specific research area do not face undue burden or discrimination from the process.</p>	<p>Thank you for your response. Regarding your concerns that the terms "resources" and "interests" are vague, please note that when the PAPPG is officially implemented, its application will be initially limited to Tribal lands or those aspects of Tribal life that are within the domain of the Tribal Nation (as opposed to individual Tribal members), including but not limited to Tribal languages and subsistence rights on Tribal Nation lands.</p> <p>Regarding your concern about pre-proposal review, Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission.</p>
30	Bigelow Laboratory for Ocean Sciences	Certification Regarding Malign Foreign Talent Recruitment Programs	II.D.1.d(ix)	II-7	Our institution recognizes the importance of preventing malicious foreign influence and/or talent recruitment on the research enterprise of the USA. We believe that improvements to reporting to enable federal agencies to assess malicious foreign influence and/or talent recruitment are warranted. We believe that the proposed addition of a new certification requirement regarding Malign Foreign Talent Recruitment Programs (page 42) does not constitute an undue burden on our institution.	Thank you for your comment.
31	Bigelow Laboratory for Ocean Sciences	Proposal Contents	II.D	Various	We welcome the proposed changes to supplemental documents for NSF proposals to now have the Mentoring Plan to include graduate students, the Data Management and Sharing Plan to now include plans for sharing data, and for the new Synergistic Activities document for all Senior Personnel.	Thank you for your comment.
32	Council on Governmental Relations (COGR)	Foreign Country of Concern	Introduction D, Definitions	xiv	<p>g. A Foreign Country of Concern – The revised version of the PAPPG includes a new definition that identifies a "Foreign Country of Concern" as the People's Republic of China, the Democratic People's Republic of Korea, the Russian Federation, the Islamic Republic of Iran, or any other country deemed to be a country of concern as determined by the Secretary of State. This definition plays a crucial role in qualifying several requirements within the PAPPG, including the definition of a Malign Foreign Talent Recruitment Program, which has significant implications for senior personnel certifications and the disclosure of Foreign Gifts and Contracts. While the definition explicitly mentions the four listed countries, it also refers to countries determined by the Secretary of State without providing a specific source or means of verification (such as a hyperlink).</p> <p>To help ensure compliance with the requirements, we request an explicit reference be included to guide recipients to the relevant information regarding countries deemed by the Secretary of State. This clarification will assist in meeting the necessary obligations.</p>	Thank you for your comment. At this time there is not an explicit reference available to guide recipients.
33	Council on Governmental Relations (COGR)	Institutions of Higher Education	Introduction D, Definitions	xv	h. An "Institution of higher education" – We appreciate that NSF aligned the definition to 2 CFR 200. Instead of copying the definition into PAPPG, we recommend cross-referencing it to 2 CFR 200, perhaps as follows. "An "Institution of higher education" as defined in 2 CFR §200, Definitions, consistent with 20 U.S.C. 1001."	Thank you for your comment. NSF believes that the full definition may provide useful context when reading the PAPPG.
34	Council on Governmental Relations (COGR)	Malign Foreign Talent Recruitment Program	Introduction D, Definitions	xv	<p>i. A Malign Foreign Talent Recruitment Program (MFTRP) – The PAPPG includes a new definition for an MFTRP incorporating provisions from the CHIPS and Science Act of 2022, with one significantly notable difference. The CHIPS and Science Act defines an MFTRP as the hallmarks listed in (A) AND (B). The PAPPG omits "and," which alters the meaning of the provision. This appears to be an oversight as it seems that the intent is to align with the CHIPS and Science Act.</p> <p>COGR requests that "and" be included in the definition between (A) and (B) as intended by the CHIPS and Science Act because this word is critical to carry out the intent of the law. Without the inclusion of "and," there is a risk of broadening the scope of definition beyond what was intended by Congress. Specifically, when "and" is omitted, the definition of an MFTRP could be understood as encompassing a program that has either the hallmarks stated in (A) or any program conducted in one of the countries of concern listed in (B) that does not fall within specified exclusions. The omission of "and" results in an overly expansive application of the definition by identifying an MFTRP as any program that is sponsored by a foreign country of concern (excluding exceptions) without clearly defining what is considered a "program" and potentially including activities or programs that have none of the hallmarks of a foreign talent recruitment programs. This was not the intended meaning of the CHIPS and Science Act definition.</p> <p>Furthermore, subparts (ii) and (iii) make references to lists developed by the John S. McCain National Defense Authorization Act for Fiscal Year 2019 (10 U.S.C. 2358 note: Public Law 115-232), which are not publicly available or accessible for recipients to verify. Our institutions are committed to promoting effective practices and safeguards to protect the U.S. scientific enterprise and have invested significant time and cost in the effort while fostering international collaborations that are vital to the success of the U.S. and global scientific enterprise. The unavailability of these lists harms institutional efforts to train researchers on entities and programs that pose security risks and on the certification that they are required to make under Chapter I.E.3.b that they do not participate in a MFTRP. Thus, this clarification is essential to ensure an accurate interpretation of this requirement for use in institutional training efforts and to ensure the accuracy and completeness of the required certification.</p>	Thank you for your feedback. Your comment has been incorporated.
35	Council on Governmental Relations (COGR)	Broad Agency Announcements	I.C.4	I-3	PAPPG 24-1 includes the addition of other transaction agreements (OTA) as a funding instrument NSF can utilize to fund proposals through a BAA. While OTA presents opportunities for flexibility and unique collaborations, it is important to acknowledge that these mechanisms can also pose challenges for principal investigators (Pis), institutions, and funding agencies, which can be counterproductive to its intended purpose. Due to its distinctive requirements, it may be beneficial to consider placing OTA within a funding solicitation rather than solely relying on the BAA. Furthermore, OTA should be used as a funding option only when other instruments are not feasible or suitable. To ensure the most effective implementation of OTA, we recommend that the NSF actively engage with the scientific community and other agencies that employ OTA to exchange best practices and approaches.	Thank you for your comment. BAAs have been removed from the categories of funding opportunities in the PAPPG.

Number	Comment Source	Topic	PAPPG Reference(s)	PAPPG Page Numbers	Comment	NSF Response/Resolution
36	Council on Governmental Relations (COGR)	Concept Outlines	I.D.1	I-3	<p>While we appreciate the additional language clarifying the use of Concept Outlines and the ProSPECT tool, we are concerned about the proliferation of submission portals for collecting pre-proposal and proposal information. Introducing new systems such as NSF's BAAM System and ProSPECT tool appears to duplicate functions already available on Research.gov and Grants.gov. This multiplicity of federal grants management systems burdens principal investigators and research administrators, who must navigate and maintain proficiency in numerous distinct systems that perform similar functions. This situation not only creates substantial overhead for recipient institutions in terms of learning, training, usage, and maintenance, it also increases the likelihood of errors.</p> <p>COGR requests that NSF allocate resources to enhance new functionality in Research.gov as a comprehensive system solution that accommodates all submission types, including concept proposals and BAAs. If the submissions cannot be handled through Research.gov, then we urge NSF to design any new system with seamless integration with Research.gov by: incorporating familiar navigation and look-and-feel; developing an integration that will significantly reduce the learning curve for the scientific community; and streamlining the overall user experience.</p>	Thank you for your comment. NSF appreciates the community's interest in the long-term evolution of NSF systems. This suggestion has been forwarded for consideration in information technology resource planning. NSF receives advice on our information technology strategies and priorities through the Business and Operations Advisory Committee. NSF seeks to continually improve our systems and we are continuing to extend the functions of Research.gov without disruption to ongoing proposal and award management and merit review processes while supporting the concurrent development and delivery of new capabilities requiring a variety of tools, and platforms to meet evolving challenges and mandates for the federal research enterprise."
37	Council on Governmental Relations (COGR)	Parties to a Malign Foreign Talent Recruitment Program	I.E.3.b	I-8	<p>Under the new requirement, individuals who are a party to an MFTRP are not eligible to serve as senior personnel. We understand that this applies to all proposals or any new NSF awards made after a specified date in January 2024 and will not apply retroactively (as consistent with Section 10632 (e). Limitation of the CHIPS and Science Act of 2022).</p> <p>COGR requests the text be clarified as follows. "Individuals who are a "current" party to a Malign Foreign Talent Recruitment Program are not eligible to serve as senior personnel on an NSF proposal or on any NSF award "issued" made after January X, 2024. See PAPPG Chapter II.D.1.e for additional information on required certifications associated with Malign Foreign Talent Recruitment Programs." Further, as noted above, a clear definition of MFTRP is essential to ensure that individuals know exactly what they must certify.</p>	Thank you for your feedback. The first comment has been incorporated.
38	Council on Governmental Relations (COGR)	Submission Windows	I.F.3	I-8	<p>We appreciate the clarification in section 3, Submission Windows, which specifies that proposals must be received by 5 p.m. based on the organization's local time rather than the Principal Investigator's (PI) local time. This clarification is immensely valuable in establishing clear expectations regarding proposal deadlines. We also suggest that the NSF consider further clarification for cases in which institutions have multiple campuses or locations. Providing explicit guidance for when an institution has various sites will help alleviate any potential confusion or ambiguity. This clarification will ensure that all parties involved, including PIs and institutions with multiple campuses or locations, understand the deadline requirements.</p>	Thank you for your comment.
39	Council on Governmental Relations (COGR)	Preaward Disclosures Current and Pending (Other) Support	II.B.1	II-2	<p>As highlighted in PAPPG 24-1 (though it is not new), senior personnel are required to provide Current and Pending (Other) Support (CPS) at the time of the proposal and on potential awards (as per Chapter II.D.2.h(ii)(g), CPS).</p> <p>We reiterate our request that NSF eliminate the need to collect CPS at the time of proposal submission. Instead, the submission of CPS information should be postponed until the project is selected for funding. Currently, recipients are required to submit CPS information at the time of proposal, award, and annually thereafter for updates. Removing the requirement for CPS at the proposal stage would alleviate a significant administrative burden on principal investigators (PIs), particularly considering that only approximately 28% of proposals are ultimately selected for funding. This revised approach would align with the existing process followed by the National Institutes of Health (NIH) and maintain consistency across agencies.</p>	NSF takes seriously the considerations surrounding the administrative burden this places on the research community. However, after further review, NSF has determined it is necessary to maintain its current policy as highlighted in PAPPG 24-1 that senior personnel are required to provide Current and Pending (Other) Support (CPS) at the time of the proposal and on potential awards (as per Chapter II.D.2.h(ii)(g), CPS).
40	Council on Governmental Relations (COGR)	Postaward Disclosures	II.B.2	II-2-3	<p>We understand the need to address Foreign Gifts and Contracts Disclosures in the PAPPG, including a dedicated section, Chapter VII.D.3. We believe, however, that the dispersed references to this requirement across multiple sections would lead to confusion for readers, as they would need to consult various parts of the PAPPG to fully grasp the requirement. Additionally, this scattered approach increases the risk of inconsistencies in cross-references, thereby risking further confusion. We suggest consolidating the requirement into a single, well-defined section of the PAPPG. By centralizing the information related to this requirement, readers will locate and understand it more easily, minimizing confusion and the need for extensive cross-referencing. This consolidation will also enhance the overall clarity and coherence of the PAPPG, facilitating better comprehension and adherence to the requirements outlined and ensuring a more streamlined and user-friendly experience when navigating it.</p>	Thank you for your comment.
41	Council on Governmental Relations (COGR)	Senior Personnel Biographical Sketch	II.D.2.h(i)(a)	II-23	<p>We appreciate the revision to the biographical sketch. Two notable modifications include removing the 3-page limit and separating synergistic activities into a separate senior personnel document type. Both are welcomed changes and demonstrate NSF's responsiveness to community feedback and the commitment to refining policies based on constructive input offered by the community.</p>	Thank you for your comment.
42	Council on Governmental Relations (COGR)	Current and Pending (Other) Support	II.D.2.h(ii)(a)	II-27	<p>In accordance with the NSPM-33 Implementation Guidance, a "Conflict of Commitment [is a] situation in which an individual accepts or incurs conflicting obligations between or among multiple employers or other entities. Many organizational policies define conflicts of commitment as conflicting commitments of time and effort, including obligations to dedicate time in excess of organizational or research agency policies or commitments. Other types of conflicting obligations, including obligations to improperly share information with, or to withhold information from, an employer or research agency, can also threaten research security and integrity and are an element of a broader concept of conflicts of commitment used in [the NSPM-33 Implementation Guidance]" [p.22].</p> <p>We recognize that this footnote quotes text from the NSPM-33 Implementation Guidance and we recommend that the adverb "improperly" be inserted before the verb "withhold" to make clear that it is improper withholding of information that may pose a threat to research security and integrity, as opposed to withholding information pursuant to lawful security or non-disclosure requirements.</p>	The NSTC's framework for federal scientific integrity required all federal agencies to adopt the federal definition aiming to achieve some degree of uniformity across the whole federal government while recognizing that there are differences. Thus NSF, as well as other federal agencies adopted the definition included in draft PAPPG which was taken directly from the framework. It is important the PAPPG and the upcoming updated NSF Scientific Integrity Policy use this definition within the appropriate context. The comment is very valuable, however, and it will be considered in the updated Scientific Integrity Policy.
43	Council on Governmental Relations (COGR)	RUI and ROA proposal types	II.F.5 II.F.6	II-49-53	<p>We appreciate the inclusion of two new proposal types, Research in Undergraduate Institutions (RUI) and Research Opportunity Awards for Predominantly Undergraduate Institutions (ROA/PU), in PAPPG 24-1. Although these funding opportunities are not new, we appreciate the NSF's initiative to highlight and draw attention to these avenues specifically designed for predominantly undergraduate institutions.</p>	Thank you for your comment.
44	Council on Governmental Relations (COGR)	Proposals Not Accepted or Returned Without Review	IV.B	IV-2	<p>The PAPPG includes a new category for proposals returned without review. The PAPPG references that NSF will develop an NSF Risk Rubric to inform the basis of the decision-making process for proposals that have the potential to negatively impact research security due to credible information of a national security concern. We are eager to learn more about the parameters and risk-based approach utilized referenced for the Risk Rubric. To help ensure transparency and inclusivity, we recommend that NSF make the Risk Rubric available for comment and engage with stakeholders before its implementation. This will allow for valuable input from the research community and other relevant stakeholders to help refine and improve the Risk Rubric to effectively address concerns and promote opportunities for crossagency harmonization. Furthermore, when a proposal is returned without review, the proposing institution (Authorized Organizational Representative) should be informed of the decision along with supporting information that formed the basis for the determination. Clear communication and the provision of supporting information will aid in promoting understanding and transparency regarding the decision-making process.</p>	Thank you for your comment.
45	Council on Governmental Relations (COGR)	Certification Requirements for Annual and Final Annual Reports	VII.D.1.b(iv)	VII-9	<p>PAPPG 24-1 expands requirements for mentoring plans requirement extending them to include graduate students in addition to postdoctoral researchers, as specified in chapter II.D.2.i.(i). Mentoring Plan (page II-32). There is also a new requirement to develop an individual development plan for graduate students or postdoctoral scholars that receive "substantial support." The plan must be updated annually, and "substantial support" is defined as one person month.</p> <p>Many institutions have established policies restricting graduate students from dedicating more than 50% effort to sponsored projects during the academic year to maintain their graduate student status. Under the policy, graduate students may devote 100% during summer. Recognizing that graduate students may be involved in multiple projects, there is a concern that defining "substantial support" as one person month may encompass insubstantial support. Considering this is a new requirement, we encourage NSF to engage with the community to collaboratively determine the best approach for addressing and defining "substantial support," which we believe should be greater than one person month and rather the equivalent to a full-time graduate student position.</p>	Thank you for your comment. We appreciate your sharing a revised recommendation, which was carefully considered by NSF. In development of the original definition of person month, we note that one person-month equates to approximately 4.33 weeks of full-time (or 100%) effort which is equivalent to approximately 173.2 person hours. Based on this expenditure of time by a graduate student or postdoctoral researcher, we have determined that this number of hours is substantial. This requirement is intended to help students with advanced STEM degrees reach their full potential and achieve their career goals. Implementation of this requirement is intended to maximize the positive impact of NSF funding that supports the development of the future STEM workforce.

Number	Comment Source	Topic	PAPPG Reference(s)	PAPPG Page Numbers	Comment	NSF Response/Resolution
46	Council on Governmental Relations (COGR)	Foreign Gifts and Contracts Disclosures	VII.D.3	VII-10	<p>PAPPG 24-1 includes revisions incorporating the implementation of Section 10339B of the CHIPS and Science Act of 2022, which pertains to foreign gifts and contracts disclosure requirements. According to these requirements, each "recipient institution of higher education" must annually report all "current financial support, the value of which is \$50,000 or more, including gifts and contracts, received directly or indirectly from a foreign source" associated with a "foreign country of concern." COGR and its partner higher education and academic research associations have consistently provided extensive input on proposed requirements in the research security area and foreign gifts reports related to Section 117 of the Higher Education Act (HEA)2. COGR supports the American Council on Education (ACE) response regarding this new requirement in the PAPPG.</p> <p>The implementation of this new requirement is of particular concern, as the PAPPG does not explicitly specify the reporting requirements. For instance, it is unclear whether the \$50,000 threshold is for a single transaction or an aggregate. While it is implied as the PAPPG defers to the U.S. Department of Education's requirements under Section 117, which uses an aggregate threshold, it is important to clarify as the CHIPS & Science Act does not specify the \$50,000 threshold as an aggregate number. Furthermore, the \$50,000 reporting requirement in the CHIPS & Science Act is significantly lower than the threshold of Section 117. As such, the PAPPG needs to clearly state how these transactions will be handled. Additionally, there is ambiguity regarding whether tuition should be included in the reporting requirement. The lower threshold of \$50,000 may encompass tuition payments made by individual students and families to some institutions. This does not appear to be the legislative intent, and it also raises student privacy concerns.</p> <p>We also note unique reporting elements for the NSF foreign gifts and contracts disclosure reporting in comparison to Section 117, such as foreign source address (2.d, 3.d., 4.d, & 5.d), gift items (pages 2-3 section e.iii and e.iv), and recipient of the gift (page 3 section f.i and f.ii).</p> <p>COGR recommends that the PAPPG clarify the reporting requirements and explicitly state whether it is a single transaction or an aggregate. Additionally, we request that tuition payments be excluded from the reporting requirement. Tuition payments are for educational services for students, as opposed to a gift or contract for research or related purposes, and do not present an opportunity for undue foreign influence. Furthermore, it would be beneficial to evaluate the need for reporting elements unique to the NSF in comparison to Section 117. This would help ensure that the information requested serves a necessary purpose.</p>	<p>Thank you for your comment. NSF notes that there is an aggregate by source not an individual threshold amount to meet the \$50,000 or more threshold for the reporting requirement for the "Foreign Gift and Contract Disclosure" required by Section 10339B of the CHIPS and Science Act. Thus, each "recipient institution of higher education" must annually report all aggregate "current financial support, the value of which is \$50,000 or more, including gifts and contracts, received directly or indirectly from a foreign source" associated with a "foreign country of concern." The purpose of the reporting requirements under Section 117 of the Higher Education Act of 1965 as amended is to ensure transparency of all reportable financial gifts from and contracts with foreign sources. The purpose of Section 10339B of the CHIPS and Science Act for foreign gift and contract disclosures from the countries of concern is national security. Given these different purposes, NSF believes that details such as the foreign source address, gift items, and recipient of the gift, are required under the "Foreign Gift and Contract Disclosure" as part of the implementation of Section 10339B of the CHIPS and Science Act to ensure the overall information validity and reliability of the annual report.</p>
47	Council on Governmental Relations (COGR)	Conflict of Interest Policies	IX.A.	IX-1-3	<p>While not new in 24-1, COGR would like to address the term "significant financial interest" which "means anything of monetary value, including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interest (e.g., stocks, stock options, private equity, or other ownership interests); venture or other capital financing, and intellectual property rights (e.g., patents, copyrights, and royalties from such rights)." The conflict of interest process concerns the significant financial interests of an "investigator," which is defined as the "PI, co-PIs, and any other person identified on the proposed project who is responsible for the design, conduct, or reporting of research or educational activities funded or proposed for funding by NSF."</p> <p>COGR's urges NSF to make clear that significant financial interests, including "venture or other capital financing" are limited to those held/received by an "investigator," as that term is defined in the PAPPG. While equity interests held by an investigator in a business entity is a "significant financial interest," venture capital or other funding directed to the corporate or other business entity in which such equity is held is not a "significant financial interest" of the investigator.</p>	<p>Thank you for your comment. Investors in the PI or in the PI's business should be disclosed. In addition, the PI's investment in a company should be disclosed. The NSF policy does not contemplate disclosure of the other investors.</p>
48	Council on Governmental Relations (COGR)	Scientific Integrity	XI.M	XI-26	<p>The PAPPG includes a new definition of scientific integrity derived from "A Framework for Federal Scientific Integrity Policy and Practice" issued by the National Science and Technology Council. Defining Scientific integrity as "the adherence to professional practices, ethical behavior, and the principles of honesty and objectivity when conducting, managing, using the results of, and communicating about science and scientific activities." It should be recognized that "professional practices" may differ among licensed professions (and indeed among jurisdictions in which licenses are held). Similarly, "ethical" behavior may also differ based on profession/jurisdiction-specific codes of ethics, as well as cultural, religious, and philosophical tenets. The March 2023 JASON Research Program on Research Security recognized similar issues [p. 4] and developed simpler and distinct definitions of "research integrity" and "research security" [p. 14].</p> <p>Rather than using these fluid concepts in a definition that is supposed to guide behavior, COGR urges NSF to follow the JASON approach by modifying the definition of Scientific Integrity to focus on the principles to which NSF expects awardees to adhere and by distinguishing between the concepts of research "integrity" and "security". We recommend the following wording that aligns with the JASON approach: "Scientific integrity is the adherence to the principles of honesty, objectivity, impartiality, transparency, accountability, fairness, and stewardship when conducting, managing, using the results of, and communicating about science and scientific activities."</p>	<p>Thank you for your comment. The NSTC's framework for federal scientific integrity required all federal agencies to adopt the federal definition aiming to achieve some degree of uniformity across the whole federal government while recognizing that there are differences. Thus NSF, as well as other federal agencies adopted the definition included in draft PAPPG which was taken directly from the framework. It is important the PAPPG and the upcoming updated NSF Scientific Integrity Policy use this definition within the appropriate context. The comment is very valuable, however, and it will be considered in the updated Scientific Integrity Policy.</p>
49	Big Ten Academic Alliance	Tribal Nations	VII.D.1.b(iv)	VII-9	<p>The proposed 2024 PAPPG adds a requirement that graduate students and postdoctoral scholars funded by NSF research have Individual Development Plans (IDP).</p> <p>Exploring how an IDP requirement would benefit graduate students is advantageous to all impacted by this requirement. The BTAA-RCR Collaborative embraces NIH and NSF promotion of positive mentoring practices and we feel that assessment of agency IDP requirement effectiveness would be beneficial. Specifically, do documented conversations regarding career goals and professional development result in more positive outcomes for postdoctoral researchers and graduate students? Previous studies suggest that IDPs can have a positive impact on the goal-setting, career planning and preparedness among doctoral and postdoctoral students. However, the usage varied across institutions, suggesting a need for greater support and implementation strategies.</p> <p>We encourage the Federal government to examine whether the current and proposed IDP requirements result in more favorable outcomes for individuals subject to these requirements, in contrast to efforts towards implementation of other positive mentoring practices. For instance, what is the appropriate duration of an individual's appointment that would correspond with the need for an IDP and an effective implementation of it? Also, would institutions solely implement IDPs for graduate students in lieu of other mentoring practices? We also encourage agency harmonization of any IDP requirements, including individuals affected, content required, certification, and agency reporting.</p>	<p>Thank you for your comment.</p>
50	Chickasaw Nation	Tribal Nations	II.E.10	II-43	<p>b. based on the guidance received, submit a written request to the relevant Tribal Nation(s), or the authorized designee(s) of the Tribal Nation(s), for approval to carry out the proposed activities/activity that require(s) Tribal review and approval.</p> <p>Recommendation: The Chickasaw Nation recommends the first step include the tribal nation's involvement in developing the research questions and associated activities.</p>	<p>Thank you for your comment and we appreciate your recommendation that the Tribal Nation be involved in developing research questions and associated activities. The intent of this provision is to provide the opportunity for early engagement with the Tribal Nation, which could include but is not limited to the participation by the Tribal Nation in developing the research questions and associated activities.</p>
51	Chickasaw Nation	Tribal Nations	II.E.10	II-43	<p>The participation of tribal citizens as human subjects in a study (note that this type of proposal may also require a separate tribal IRB).</p> <p>Recommendation: The Chickasaw Nation recommends this language be broader to include the process or body the tribe might have in place for research functions, as some tribes do not have a tribal IRB.</p>	<p>Thank you for your comment. NSF agrees that this language should be broader to include other mechanisms that a Tribal Nation may have in place to review proposed research that has the potential to impact Tribal interests or resources. In response, the language has been revised to address this.</p>
52	Chickasaw Nation	Tribal Nations	II.E.10	II-43	<p>c. Any proposal for NSF funding that may impact tribal resources or interests must: (i) Check the box on the Cover Sheet entitled "Potential Impacts on Tribal Nations" if, pursuant to the above, the proposal may impact the resources or interests of a Tribal Nation. Please note that simultaneously submitted collaborative proposals and proposals that include subawards are a single unified project and, as such, the lead organization is responsible for checking the box on the Cover Sheet, if applicable. (ii) Include one of the following: (a) a copy of the written request to the relevant Tribe(s) to carry out any proposed activities/activity that require(s) prior approval from the Tribal Nation(s).</p> <p>Recommendation: The Chickasaw Nation recommends this paragraph be further clarified to ensure a copy of the request to the tribe alone is not sufficient to start research activities. Instead, it should be clearly written that approval from the tribal nation is required to start research activities.</p>	<p>Thank you for your comment. While language exists later in the proposed provision that expressly states that no award will be granted unless prior permission by the Tribal Nation has been obtained, we have clarified the language in this section to emphasize this point.</p>
53	Chickasaw Nation	Tribal Nations	II.E.10	II-43	<p>d. NSF funding for a proposal that includes an activity that requires prior approval from a Tribal Nation or Tribal Nations will not be awarded until the required documented approval from the relevant Tribal Nation(s) has been submitted to NSF.</p> <p>e. An exception to this requirement may occur when the proposal includes an initial phase for planning collaboratively with the tribe(s). However, under this exemption, subsequent phases may not proceed until a written prior approval from the Tribal Nation(s) is submitted to the cognizant program officer.</p> <p>Recommendation: The Chickasaw Nation recommends there be some type of documentation to indicate that the tribal nation has agreed to the planning phase, if it is to be a true collaboration.</p>	<p>Thank you for your comment. While language exists later in the proposed provision that expressly states that no award will be granted unless prior permission by the Tribal Nation has been obtained, we have clarified the language in this section to emphasize this point.</p>

Number	Comment Source	Topic	PAPPG Reference(s)	PAPPG Page Numbers	Comment	NSF Response/Resolution
54	Chickasaw Nation	Tribal Nations	II.E.10	II-43	As we did not observe any language insertion on discussing/negotiating upfront issues concerning data ownership, access, use and publication of research results with the tribe, the Chickasaw Nation recommends such language be added to the draft.	Thank you for your comment. The intent of this provision is to ensure Tribal Nation interests and resources are respected and to encourage early engagement and meaningful collaboration with the Tribal Nation(s). In addition, Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission.
55	University of Colorado Boulder	Certification Regarding Malign Foreign Talent Recruitment Programs	II.D.1.d(ix)	II-7	We recommend that this specific AOR certification be added to the PAPPG Chapter II.D.1.d, "Proposal Certifications Provided by the Organization."	This certification is already included in the specified section.
56	University of Colorado Boulder	Synergistic Activities	II.C.2.h(iv)	II-32	We recommend that, unless the intent of the NSF is to gather more detail about each activity, an additional document not be added to the current number of required uploaded documents. Additionally, current biographical sketch formats (which have the inclusion of synergistic activities) are not required for Conference Proposals or Travel Proposals, however the draft PAPPG indicates the new synergistic activities document will be required for these types of programs.	Thank you for your feedback. The update has been incorporated.
57	University of Colorado Boulder	Mentoring Plan	II.D.2.i(i)	II-33	We recommend that Mentoring Plans for Graduate Students be a separate document from Mentoring Plans for Postdoctoral Scholars. A single project may have both roles participating on the activity and have different mentoring requirements, which could not be efficiently detailed in a single one-page document. We further recommend that the requirement for a single Mentoring Plan for Graduate Students not be implemented for collaborative proposals. If the mentoring plan for Graduate Students is found to be of benefit we believe each institution should develop and upload their own mentoring plans, as mentorship for these individuals will vary between PIs and between Institutions per their individual organizational policies.	Thank you for your comment. NSF has determined that it should be one plan to cover graduate students and postdoctoral researchers.
58	University of Colorado Boulder	Safe and Inclusive Working Environments for Off-Campus or Off-Site Research	II.E.9.d	II-43	We recommend that each submitting organization should check the box on the cover page as appropriate to their activities and submit a monitoring plan specific to their organization and participating subrecipients. Each organization has only the authority to implement their plan according to its organizations in one two-page plan has proven to be challenging and could inadvertently lead to the submission of incomplete information.	Thank you for your comment. NSF considers collaborative proposals to be a unified research project and as such there is one plan submitted for the entire project. It should be noted that this is consistent with the treatment of data management and postdoctoral mentoring plans.
59	Anonymous	Tribal Nations	II.E.10	II-43	Regarding the changes to Chapter II, Section E10 "Seeking and Obtaining Tribal Nation Permission for Proposals that May Impact Tribal Resources or Interests": Clearer instruction is needed on how NSF is defining "Tribal Resources or Interests." As is, this statement is open to very wide interpretation and could be applied to almost any activity taking place in any area where any Native peoples may have had an ancestral presence/history. Also, what level of "guidance" or tribal review is needed? Is this something that will require a full community consultation or just the approval of certain individuals/approved leadership groups? And who gets to decide whether the right contact/body has been sufficiently consulted? Although tribal consultation is highly desirable, these new rules are also likely shift the administrative burdens of consultation (prior to funding) to Indigenous communities that may not have the resources or staff capacity to engage in the review of all NSF proposals that may be developed. Similar to the increased pressure that Alaska Native organizations faced around NSF's Navigating the New Arctic, this is likely to create a highly disorganized process of potential PIs/COPs reaching out randomly for consultation. I encourage NSF to consider whether there may be alternative processes that will ameliorate the need for many different tribal contacts to bear the burden of reviewing all NSF proposals in a disorganized/haphazard way. For example, could there be an NSF-funded panel or review board that determines which projects require greater levels of review/consultation? Or, could NSF outline/manage a regional review process that happens with the participation of clearly identified groups of tribal government appointees on a regular timeline? (similar, perhaps, to the fisheries management councils... or to the Ice Drilling Program's process for requesting field support?). Tribal Nation(s) may each have their own preferred method for consultation... but it should not left to each individual researcher or prospective researcher to decipher what those processes might be from project to project. Finally, prior to seeking participation/guidance from tribes, NSF might think about requiring researchers to complete standard baseline training on "working with Indigenous communities" developed for different regions. Trainings developed in partnership with tribal Nations and social scientists might help to prevent many missteps from well-intentional researchers that do not otherwise have a background working with or around Native communities.	Thank you for your comments. Regarding your concerns that the terms "resources" and "interests" are vague, please note that when the PAPPG is officially implemented, its application will be initially limited to Tribal lands or those aspects of Tribal life that are within the domain of the Tribal Nation (as opposed to individual Tribal members), including but not limited to Tribal languages and subsistence rights on Tribal Nation lands. In addition, Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission.
60	Oakland University	Biographical Sketch	II.D.2.h(i)(a)	II-23	Rather than continually tweaking the biosketch format every couple of years, consider moving to the NIH model. This would have several benefits, not the least of which would be reducing burden on investigators and research administrators by eliminating the need to switch between formats. It would also permit investigators to give a more detailed explanation of their fitness for conducting the proposed research, and demonstrating the ways in which they've already contributed to their discipline(s).	Thank you for your comment.
61	Oakland University	Synergistic Activities	II.D.2.H(iv)	II-32	Let's admit that the concept of synergistic activities is still so poorly understood by all concerned that it is no longer worth the trouble of including it in proposals.	Thank you for your comment.
62	Oakland University	Mentoring Plan	II.D.2.i(i)	II-33	Now that mentoring plans must include graduate students as well as postdoctoral researchers, the page limit for the mentoring plan must be increased. It's already difficult to do justice when the plan has to cover postdocs at multiple institutions. Adding graduate students to the mix without giving investigators more room than just a single page will make it virtually impossible to provide any in-depth discussion of the basic plans, much less describing "how different components will be enacted for each group."	Thank you for your comment.
63	University of Alaska	Tribal Nations	II.E.10	II-43	This comment is a follow-up from the NNA-CO hosted session. I want to applaud including this Tribal Nation Permission for Proposals, but also acknowledge that it will be a difficult transition to meet it. I speak as an Indigenous researcher and not a Tribal leader, so I am hesitant to make recommendations for the PAPPG wording specifically. I agree with the issues raised in the NNA-CO hosted session, as well as the comment letter drafted by NNA-CO. But I wanted to highlight the importance of making Tribes aware of this change, which could be part of in also making Tribes aware of NSF programs that could be relevant for them. The Federal Registry is an insufficient form to engage Tribes, as it will get lost in the copious requests in this format. I am not sure what is part of the training for program managers to understand what "potential impacts on Tribal Nations," but I will assume that this is not Tribally developed and therefore could be insufficient. Beyond just training for program managers, I would support program managers to attend conferences heavily attended by Indigenous Peoples, as they do with science conferences. This was also brought up in the NNA-CO hosted session, but I would add to the conference list BIA Providers and Alaska Forum on the Environment for Arctic research. This would support starting to build relationships with Tribal leaders and have program managers start to understand the complexity of what could potentially impact Tribal Nations. I would also expect this to be an iterative process, where NSF could provide staffing, resources, training, and funding assistance for Tribes to adjust. I think this will be a long, but much-needed, process to overcome barriers and challenges to participation in research.	Thank you for your comments. NSF agrees that it is important to build relationships with Tribal Nations. The Foundation has been in the process of significantly expanding its outreach to Tribal Nations and this proposed new language is in response to that increased outreach. It is important for NSF to attend conferences heavily attended by Indigenous Peoples and continue to increase its participation at such conferences in the future.
64	University Corporation for Atmospheric Research (UCAR)	Malign Foreign Talent Recruitment Program	Introduction D. Definitions	xvi	Could the NSF provide additional clarity regarding the definition of "program" as used in i.B definition of Malign Foreign Talent Recruitment Program found in Section E of the Introduction to the PAPPG "Definitions & NSF-Recipient Relationships", which currently reads "A program that is sponsored by...". The addition of a definition of the term "program" or ready examples of what would be included in the definition of "program" would further assist teams in the relevant and equitable application of this definition and the related rules that rely upon it. Additional clarification to Chapter 1, Section E - "Who may submit proposals", subsection 3.B, states that "Individuals who are a party to a Malign Foreign Talent Recruitment Program are not eligible...". Could the NSF provide additional clarity on what would qualify as 'party to' an MFTRP? A definition or examples would be very helpful as would knowing if this definition only applies to the individual or their immediate family as well..	NSF has utilized the statutory definition from the CHIPS and Science Act of 2022.
65	University of Maryland Center for Environmental Science	Tribal Nations	II.E.10	II-43	We are concerned that the new draft provisions in the NSF Proposal and Award Policies and Procedures Guide that propose changes in the policies relating to tribal governments are too vaguely written and will introduce significant complications in undertaking research. Our concern is not with regards to tribal lands, where it is appropriate that controls are in place to consider the role of tribal governments. Rather, it is the vague language that states "Prior to submission of a proposal that may impact the resources or interests of a federally recognized American Indian or Alaska Native Tribal Nation (Tribal Nation), PIs must: a. Seek guidance from the potentially impacted Tribal Nation(s) regarding what activities/activity require(s) review and prior approval from the Tribal government(s) or authorized designee(s) of the Tribal government(s); and b. Based on the guidance received, submit a written request to the relevant Tribal Nation(s), or the authorized designee(s) of the Tribal Nation(s), for approval to carry out the proposed activities/activity that require(s) Tribal review and approval." This vague language potentially enables any tribal entity to assert that their interests and resources are impacted by proposed scientific research, whether that land or sea area is actually controlled by the Tribal government or not. We undertake marine research in the Alaskan Arctic and are familiar with the interest of local communities in our research results, and we provide information and data back to local communities that helps support subsistence of local food resources. We provide information, for example, on the status bivalve populations 60 miles south of St. Lawrence Island in the Bering Sea that foraging walrus use for food. Some of these walrus are harvested for food by hunters from the two villages on St. Lawrence Island, Savoonga and Gambell. In this case, ecosystem health is in the interest of the many villages in the Bering Strait region, but requiring scientists to seek tribal government permission from each of those villages to sample the sea floor many miles south of those villages is misguided and imposes requirements on the scientific community that will actually decrease our capabilities to assess ecosystem health for the benefit of those villages as well as all other US citizens with interests in Arctic ecosystem health in the face of climate change. Thank you for your consideration.	Thank you for your comments. Regarding your concerns that the terms "resources" and "interests" are vague, please note that as this new requirement is launched, its application will be initially limited to Tribal lands or those aspects of Tribal life that are within the domain of the Tribal Nation (as opposed to individual Tribal members), including but not limited to Tribal languages and subsistence rights on Tribal Nation lands.

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66	Cheryl Rosa	Tribal Nations	II.E.10	II-43	<p>Two days lead time prior to the NNA-CO webinar did not provide a timeline that would allow this level of consideration prior to the June 12th deadline.Regarding the proposed changes to the PAPPG involving Tribal permissions for researchers doing work that involves Tribal resources, I strongly advise holding off on proposed changes until the National Science Foundation provides more detailed information to a wider group of stakeholders, scientists, and Tribal representatives. The changes proposed by NSF are broad/wide-ranging, they impact a number of different stakeholder and rights-holder groups, and they lack necessary detail. As examples: on the webinar, there were many unanswered questions regarding the proposed changes. I list several (only a subset):</p> <ul style="list-style-type: none"> • What was the consultation with AK Tribes before the guidelines were drafted? • How will training or updates on tribal rights under the updated guidelines be conveyed to Tribes? Will there be support provided for these activities? • Clear guidance is needed on what constitutes "Tribal resources." Who determines this? Does this apply to land-based research only? What about ocean/water or even stream-based research that passes through or near Tribal lands? • How do PIs determine what is defined as impacting "Tribal interests," when in Alaska, one could easily argue that any research in Alaska will impact Tribal interests? And are PIs the appropriate entity to determine this? Who will adjudicate disagreements on these topics? • Will there be additional funding/personnel-time for Tribes to address the requests for approval letters? The same question holds for inquiries into Tribal interests. • Which Tribal entity or designee is the 'correct' one and how do PIs find that out? • Will the NSF proposal process and expectations allow for a longer time to prepare proposals (i.e., rolling proposal deadlines)? Will NSF provide a means of funding pre-submission proposal activities that involve consulting with tribal entities? • What happens if consent from a Tribal Government is revoked during a project? • Will funding be available to help local Tribes/communities address what will likely be a steep increase in inquiries regarding partnerships/co-production? • What role will community advisory boards play in obtaining permissions? • What actions need to be taken when there is a change in representatives/staff on either the Tribal or the federal/PI side? How much of a change to Tribal government will trigger a requirement for new permissions? <p>I have recently attended the Synoptic Arctic Survey Workshop with ~40 other scientists working in the Arctic. None that I asked had heard of these proposed changes and all had questions. Making these changes with little socialization/lead time during busy subsistence, as well as field season time periods is not ideal. I appreciate your consideration of my recommendation to hold off on proposed changes until the National Science Foundation provides more detailed information to a wider group of stakeholders, scientists, and Tribal representatives.</p>	<p>Thank you for your comment. In response to your question about the level of consultation that took place prior to developing the proposed language, please note that this language was drafted in response to what we heard during an April 2021 Director's Town Hall to which all federally-recognized Tribal Nations were invited, a 90 day public comment period that commenced shortly before the 2021 Town Hall, a series of listening sessions that occurred during the summer of 2022, and outreach efforts of NSF's Tribal Consultation and Engagement Working Group (which included attending conferences focused on the interests of Tribal Nations). The proposed language was then drafted and public comments were solicited between mid-April of 2023 and June 12, 2023. To ensure that federally-recognized Tribal Nations were aware of this proposed language, NSF sent out both emails and post cards to Tribal Nation leaders notifying them of this proposed language. In addition, NSF held "office hours" to answer questions about the proposed language. The NNA-CO webinar was another opportunity that NSF provided to answer questions about the proposed language during the public comment period. Regarding your comments about assistance, guidance, and training to interpret implementation of the proposed language, NSF takes the position that Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission.</p> <p>In addition, please note that there are no timelines associated with this new language and Tribal Nations can follow whatever timeline works best for them. Regarding your concerns that the terms "resources" and "interests" are vague, please note that as this new requirement is launched, its application will be initially limited to Tribal lands or those aspects of Tribal life that are within the domain of the Tribal Nation (as opposed to individual Tribal members), including but not limited to Tribal languages and subsistence rights on Tribal Nation lands.</p>
67	Heather Sauyaaq Jean Gordon, Child Trends	Tribal Nations	II.E.10	II-43	<p>Indigenous people are underrepresented in all areas of study, not only STEM. I fear this emphasis on STEM diminished important other social sciences and arts that are key to our Indigenous Knowledge and cultural survival. (regarding the Introduction and section A) 2-I recommend that in addition to Tribal Nation, you create an application category for an Indigenous nonprofit. You could base the determination on if 2/3 of the board are Indigenous (the Administration for Native Americans has this designation). This designation allows there to be recognition of non federally recognized Indigenous organizations (like Native Hawaiians, other Pacific Islanders, state recognized Tribes, terminated Tribes) that function through nonprofits or for low capacity and small Tribes in Alaska that run many services through nonprofits. Only acknowledging federally recognized is extremely disrespectful as Tribes are sovereign without the federal government recognizing them and many are unrecognized or were terminated throughout history. (regarding the Category of Proposers section) Please also see the talk that was given about Hawaii and the talk I gave on Alaska Natives to the NSF ERG. 3-In addition to Tribal Nations there should be checkboxes on the cover sheet for Indigenous nonprofits, state recognized Tribes, Tribal Colleges and Universities, unrecognized Tribes, etc. Or the Tribal Nations definition should be expanded to encompass these other designations (in regards to Other information) 4-I would add a note on Indigenous Data Sovereignty to the Data Management section and note that sharing is not always authorized by Tribes or Indigenous communities/nonprofits and that is ok. 5-In reference to the Federal Environmental Statutes and submission of a collaborative proposal from multiple orgs. Again, I advise in all places that the definition of Tribal Nation be expanded to the definition I put in number 2.</p>	<p>Thank you for your comment. NSF acknowledges your concern about not including Indigenous communities and nonprofit organizations that are not federally recognized in this proposed language. NSF recognizes that there are challenges to including these Indigenous communities but continues to explore implications of what such a change would mean, to both NSF and the Tribal Nations. Regarding your concerns that the terms "resources" and "interests" are vague, please note that as this new requirement is launched, its application will be initially limited to Tribal lands or those aspects of Tribal life that are within the domain of the Tribal Nation (as opposed to individual Tribal members), including but not limited to Tribal languages and subsistence rights on Tribal Nation lands.</p>
68	Heather Sauyaaq Jean Gordon, Child Trends	Tribal Nations	II.E.10	II-43	<p>As Native Hawaiians and other Indigenous people not federally recognized also need their resources and interests protected. As Indigenous people we have a kinship based relationship to the environment and harm to the water, animals, or lands also harms our wellbeing. 6-In reference to section 10 on seeking and obtaining Tribal Nation Permission. Here again I urge the broadening of the definition of Tribal Nations for reasons outlined above. Additionally, to the section ii of what to include, I disagree with (a). Submitting the letter of request sent to the Tribe does not show that the Tribe approved the activity. I would say that b, c, or d are relevant but (a) needs to be removed as it does not show any Tribal response. Additionally, this section is vague as it does not firmly outline what it means that "resources or interests" may be impacted. While there are some examples, the examples do not recognize that subsistence practices in Alaska are often on state and federal land and scientific engagement in studies can affect subsistence and food security. In Alaska land claims gave the land to state, feds, and Alaska Native for profits, NOT Tribes, so there needs to be additional protections written in for use areas by Alaska Tribes. 7-In reference to Chapter XI. There are more executive orders relevant to equity and also Indigenous Peoples. There are also other EOs in regard to environmental justice. 8-Finally I urge you to return to the two letters by Kawerak et al to the NSF Navigating the New Arctic program. Please engage directly through the revision process with Tribes, Indigenous nonprofits, TCUs beyond just this draft, but through additional revisions. 9-Additionally, I urge you to talk to Indigenous nonprofits, Native Hawaiians, Pacific Islanders, unrecognized Tribes, state recognized Tribes and others about the Kawerak letters as well. These issues of sovereignty apply far beyond federally recognized Tribes. Indigenous protections and care of the land and waters is vital to the future of the world and we must be leading ecological work with our generations of knowledge.</p>	<p>Thank you for your comment. NSF acknowledges your concern about not including Indigenous communities and nonprofit organizations that are not federally recognized in this proposed language. NSF recognizes that there are challenges to including these Indigenous communities but continues to explore implications of what such a change would mean, to both NSF and the Tribal Nations. Regarding the process for seeking a request for Tribal Nation approval, we acknowledge that a letter of request does not indicate Tribal Nation approval, the intent of paragraph (a) is to ensure that the PI starts the process of engaging the Tribal Nation prior to submission of the proposal. Paragraph (d) in the proposed provision that expressly states that no award will be granted unless prior permission by the Tribal Nation has been obtained, and we have clarified the language in this section to emphasize this point.</p> <p>Regarding your concerns that the terms "resources" and "interests" are vague, please note that when the PAPPG is officially implemented, its application will be initially limited to Tribal lands or those aspects of Tribal life that are within the domain of the Tribal Nation (as opposed to individual Tribal members), including but not limited to Tribal languages and subsistence rights on Tribal Nation lands.</p>
69	ARCUS	Tribal Nations	II.E.10	II-43	<p>Thank you for your continued work on evaluating and improving the PAPPG. My comments are specific to the proposed instructions for "Seeking and Obtaining Tribal Nation Permission for Proposals that May Impact Tribal Resources or Interests" and how that may impact research conducted in Alaska. My comments represent my perspective as an individual, rather than an official statement from my organization or Board of Directors. The proposed changes to the PAPPG regarding Tribal engagement are an important step in improving research in Alaska and moving towards more equitable inclusion of Tribal organizations and the interests of Alaska Native communities, researchers, and scholars. In the unique Alaska context, however, with over 200 Federally-recognized tribes, the presence of the Alaska Native Claims Settlement Act of 1971 (ANCSA) and Alaskan National Interest Land Conservation Act (ANILCA), as well as other relevant federal and Alaska state laws, subsistence rights, and a complex organization of Alaska Native organizations (e.g., village corporations, regional corporations, etc.), more consideration should be taken on how the proposed guidelines would be implemented and the unintentional burdens and confusion that may result. Specifically: -More guidance is needed for potential grantees on how to determine if a research idea would impact Tribal interests and hence require Tribal permission; in Alaska, one could easily argue that all research would impact Tribal interests. Would the determination lie solely with the potential grantee, who may or may not already have the knowledge or experience of Tribal priorities and interests? -Any Tribal/Ak Native organization that would be responsible for handling these requests should be sufficiently resourced with funding and personnel before the policy takes effect, with direction from the Tribes on the needed resources and support to prevent additional unfunded burdens. The Tribal organizations should be provided the support and time to develop their own research priorities, protocols, research review process, and support infrastructure, as they deem appropriate for their community and region. -Additional information (e.g., a documented process and contact information) would be needed detailing how grantees should request guidance from Tribes or relevant Ak Native entities. -Priority should be given to funding opportunities that foster relationship-building with Tribal organizations, and Tribal-led research. Without addressing the implementation process, the proposed policy would likely cause confusion and burden by both Tribes and non-Tribal researchers. Thank you again for your work on this issue and for the opportunity to comment.</p>	<p>Thank you for your comment. Regarding your concern about which resources and interests are covered by this provision, NSF has determined that when the PAPPG is officially implemented, its application will be initially limited to Tribal lands or those aspects of Tribal life that are within the domain of the Tribal Nation (as opposed to individual Tribal members), including but not limited to Tribal languages and subsistence rights on Tribal Nation lands.</p> <p>Regarding your concern about how potential proposers will determine if a research idea would impact Tribal interests and hence require Tribal permission, please note that the intent of this provision is to ensure that Tribal Nation interests and resources are respected. PIs are therefore encouraged to engage early and consult with the Tribal Nation(s) to determine whether their projects may impact the Tribes, as well as involve them in the design of the study as appropriate. In addition, NSF takes the position that Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission.</p>
70	Pennsylvania State University	General Comment	N/A	N/A	<p>Recommends NSF make numerous changes from "should" to "must." 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>Thank you for your comment. As previously responded, NSF has made this assessment, and usage of these terms remain accurate.</p>
71	Pennsylvania State University	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>Please make the font minimum 11 point. This will avoid confusion with the PI's and research teams.</p>	<p>Thank you for your comment.</p>
72	Pennsylvania State University	Project Description	II.C.2.d(i)	II-12	<p>Edit the third paragraph to state: "The Project Description also must contain, as a separate section within the narrative, a section labeled "Broader Impacts," and the Broader Impacts must appear as a heading on its own line.</p>	<p>Thank you for your comment. This update has been incorporated.</p>
73	Pennsylvania State University	Participant Support	II.D.2.f(v)	II-17	<p>Suggest moving the last paragraph on II-17 to the end of section (c)(v) for better flow. The paragraphs preceding and following this one both discuss allowable participant support costs.</p>	<p>Thank you for your comment. This update has been incorporated.</p>
74	Pennsylvania State University	Current and Pending (Other) Support	II.D.2.h(ii)	II-29	<p>In the Total Award Amount section: If the grant is a subaward to your organization, enter only the total award amount of the subaward, including indirect costs.</p>	<p>Thank you for your comment. This update has been incorporated.</p>

Number	Comment Source	Topic	PAPPG Reference(s)	PAPPG Page Numbers	Comment	NSF Response/Resolution
75	Pennsylvania State University	Current and Pending (Other) Support	II.D.2.h(ii)	II-29	In the Person-Month(s) (or Partial Person-Months) Per Year Committed to the Project: Commitments entered on this form do not constitute cost sharing if they have not been listed on grant proposals.	Thank you for your comment.
76	Pennsylvania State University	Documentation of Collaborative Arrangements of Significance to the Proposal through Letters of Intent	II.D.2.(iii)	II-34	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.	Thank you for your comment.
77	Pennsylvania State University	Submission of a Collaborative Proposal From Multiple Organizations	II.E.3.b(i)	II-37	Up to now, a proposal PIN has not been required for linking proposals with research.gov. It would be surprising if this started to be required now.	Thank you for your comment. The proposal PIN and the temporary proposal ID are the only linking mechanism for collaborative proposals from multiple organizations. See "Collaborative Proposals" section at https://www.research.gov/research-web/content/aboutpsm#psm .
78	Pennsylvania State University	Foreign Gifts and Contracts Disclosures	VII.D.2.b(iv)	VII-10-11	When it refers to "the end date of the award" does the term "award" in this case mean a gift or contract from a foreign source? Or does it mean an award from NSF? If it refers to gifts or contracts, it would make more sense to just stick to those words and be consistent with the rest of that section. If it means an award from NSF (e.g., to PSU) then which award? Because the gifts and contracts we will need to report are not tied to federal awards; they are independent transactions. So, we would potentially have to keep records forever since I'm sure we will always have awards from NSF. I have seen a lot of inconsistent wording in the various rules and policies to come out on research security, and just think that particular phrase in the PAPPG could be made clearer.	Thank you for your comment. NSF could not identify the language quoted by the commenter "end date of the award." The term "end date of the award" is not referenced in Section 2.b.iv, which is about the type of foreign source for a gift from a foreign source.
79	University of Wisconsin-Madison	Malign Foreign Talent Recruitment Program	Introduction D. Definitions	xv	Having a definition of malign foreign talent recruitment program is helpful, as is knowing what activities are not included in the definition. It may be useful for NSF to clarify that parts (A) and (B) are indicators of a malign foreign talent recruitment program. If this clarification were not made, then legitimate academic collaborations may be mischaracterized as malign foreign talent recruitment programs. We presume that NSF does not intend for this type of mischaracterization to occur, given that the CHIPS and Science Act Section 10638 includes the word "and" between parts (A) and (B) in the definition of malign foreign talent recruitment program. Part (B) of the definition incorporates these references: "(ii) an academic institution on the list developed under section 1286(c)(8) of the John S. McCain National Defense Authorization Act for Fiscal Year 2019 (10 U.S.C. 2358 note; Public Law 115-232); or (iii) a foreign talent recruitment program on the list developed under section 1286(c)(9) of the John S. McCain National Defense Authorization Act for Fiscal Year 2019 (10 U.S.C. 2358 note; Public Law 115-232)." We are unable to locate the information in these references. We ask that NSF provide these lists so that they are readily available to the research community.	Thank you for your comment. The term 'and' has been added to clarify that both parts A and B are included in the definition of malign foreign talent recruitment program.
80	University of Wisconsin-Madison	Certification Regarding Malign Foreign Talent Recruitment Programs	II.D.1.e	II-7	Senior personnel must certify that they are not party to a malign foreign talent recruitment program. In the proposal, senior personnel will make this certification as part of the Biographical Sketch and the Current and Pending/Other Support documents. After an award is made, how will the certification occur annually? PIs and co-PIs are only required to submit a revised current and pending support document with the project report if there has been a change in active other support. If that condition is not met, how will the certification occur?	Thank you for your comment. Enhancements will be made to NSF corporate systems to address the annual certification requirement.
81	University of Wisconsin-Madison	Biographical Sketch	II.D.2.h	II-23	Thank you for removing the three-page limitation for the Biographical Sketch. The absence of a page limitation is welcome.	Thank you for your comment.
82	University of Wisconsin-Madison	Proposal Not Accepted or Returned Without Review	IV.B	IV-2	NSF has added a reason for not accepting a proposal or returning it without review because it "has the potential to negatively impact research security." It would be helpful for NSF to engage with the Authorized Organizational Representative if this is the reason that a proposal is not accepted or returned. Doing so would be consistent with the NSPM-33 Implementation Guidance, because the Guidance indicates that there should be "Notice and due process in agency consideration and application of regulatory administrative action." Also, the comment for this new reason mentions an NSF Risk Rubric. UW-Madison, as part of the research community, would appreciate an opportunity to review and comment on the NSF Risk Rubric. We would like to understand how the NSF Risk Rubric will impact our proposals and awards.	NSF concurs with the proposed recommendation to engage with the Authorized Organizational Representative if a proposal is not accepted or returned without review due to national security concerns. Furthermore, NSF will plan engagement sessions to solicit feedback from the research community outside of the official PAPPG process.
83	University of Wisconsin-Madison	Certification Requirements for Annual and Final Annual Reports	VII.D.1.b(iv)	VII-9	This certification appears to be the first and only mention in the PAPPG of an "individual development plan" required for graduate students and postdoctoral scholars. This is a substantial new requirement and should be described in greater detail. UW-Madison suggests that NSF elaborate on this requirement in Chapter IX: Recipient Standards. Please clarify if this requirement only applies to postdocs supported on awards issued to the organization, which would mean that the requirement does not apply to postdocs paid directly by NSF.	Thank you for your comment. This update has been incorporated.
84	University of Wisconsin-Madison	Foreign Gifts and Contracts Disclosures	VII.D.3	VII-10-11	Please confirm whether organizations need to report single transactions with a value of \$50,000 or more, or if organizations are expected to report transactions from a foreign source/country of concern with an aggregate value of \$50,000 or more. The report due date is July 31st, but a reporting period is not listed. UW-Madison recommends that the reporting period should be the calendar year to align with Department of Education (ED) reporting. The burden to complete the Section 117 reporting is significant and requires that UW-Madison collect and analyze information from multiple offices and organizations internal and external to the University. Because the NSF Foreign Gifts and Contracts Disclosure is not identical to the information requested by ED, we need sufficient time to compile information for each report. Thank you for providing information about proposed data elements to be collected. The definition of "foreign country of concern" raises questions. First, the Department of State maintains a list of Countries of Particular Concern. Is this the list to which organizations should refer? If so, NSF may want to provide a hyperlink in its guidance to this specific list. Second, if an organization were to receive funds from Hong Kong or Macau (or another Special Administrative Region of China), are those to be counted as gifts or contracts from China? For consistency with ED, NSF may wish to consider making only 2.d.i a required data element. For HEA Section 117 reporting to ED, only the country name is required. Regarding 2.f.i and iii, please clarify the difference between "a foundation of the institution, and related entities such as any educational, cultural, or language entity" and "an intermediary." For the purposes of ED reporting, we consider the two phrases to have essentially the same meaning. As i. and iii. are currently written, UW-Madison is unclear how to differentiate the two categories for reporting purposes. For consistency with ED, NSF may wish to consider making only 3.d.i a required data element. For HEA Section 117 reporting to ED, only the country name is required. Regarding 5.f.iii, NSF indicates on page 1 of the proposed data elements document that the agency is adopting the same definition as ED for "restricted or conditional gift or contract." However, part iii inescapably expands the definition beyond 20 U.S.C. § 1011f(h)(5) and goes outside of Section 10339B of the CHIPS and Science Act. This expanded definition constitutes an entirely new data element and a new burden. For consistency with ED and to reduce burden on organizations, UW-Madison recommends deletion of this data element.	Thank you for your comment. NSF appreciates the commenter's questions and is clarifying the following three areas. (1) Regarding the timelines for reporting, the reporting requirement for the "Foreign Gift and Contract Disclosure" required by Section 10339B of the CHIPS and Science Act is an annual requirement. Thus, NSF expects that the first report due July 31, 2024 will cover the annual period from July 1, 2023 through June 30, 2024 to allow a 30-day lag time for finalization of the collection and reporting of this information. The second report due July 31, 2025 will cover the annual period from July 1, 2024 through June 30, 2025. (2) Regarding the comment about "foreign country of concern," NSF notes that the Secretary of State, pursuant to authority delegated by the President, annually designates Countries of Particular Concern (CPC) under the International Religious Freedom Act, based on a determination that a country's government has engaged in or tolerated "particularly severe violations of religious freedom." 22 U.S.C. § 6402. Accordingly, organizations should not refer to the State Department CPC designations for purposes of interpreting Section 10339B of the CHIPS and Science Act of 2022 (P.L. 117-167). NSF applies the following for the term "foreign country of concern" for reporting purposes under Section 10339B to mean "the People's Republic of China, the Democratic People's Republic of Korea, the Russian Federation, the Islamic Republic of Iran, or any other country determined to be a foreign country of concern by the Department of State." (3) Finally, regarding the comment about data elements, NSF notes that the purpose of the reporting requirements under Section 117 of the Higher Education Act of 1965 as amended is to ensure transparency of all reportable financial gifts from and contracts with foreign sources. This is in contrast to the national security purpose of Section 10339B of the CHIPS and Science Act for foreign gift and contract disclosures from the four identified countries of concern. Given these different purposes, NSF believes that details such as the foreign source address, gift items, and recipient of the gift, are required under the "Foreign Gift and Contract Disclosure" as part of the implementation of Section 10339B. Regarding reporting requirements 2.d and 3.d, NSF believes that details provided under the "Foreign Gift and Contract Disclosure" required by Section 10339B of the CHIPS and Science Act ensure the information's validity and reliability. Regarding reporting requirement 5.f.iii, to list the name of any and all intermediaries, this information is needed if the gift is not made directly.

Number	Comment Source	Topic	PAPPG Reference(s)	PAPPG Page Numbers	Comment	NSF Response/Resolution
85	University of Wisconsin-Madison	Compliance with E.O. 12898	XI.A.1 XI.A.8	XI-1 XI-6	A.1. General and 8. Environmental Justice under E.O. 12898 (pages 164 & 169/196): These sections add that NSF recipients must comply with E.O. 12898 but include little detail about how recipients are to comply. Please provide additional guidance about how recipients are expected to comply with this Executive Order. Also, the last sentence in paragraph 8.a. does not seem to belong, as it refers to LEF rather than E.O. 12898.	<p>Thank you for your comment. We added Executive Order 12898 "Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations" (February 11, 1994) to this version of the PAPPG because this executive order has applicability to the actions of NSF awardee organizations with respect to compliance with Title VI of the Civil Rights Act of 1964 42 U.S.C. 2000d, and NSF's implementing Title VI regulations at 45 CFR 611. Executive Order 12898 requires that "each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States". However, Executive Order has been further clarified by the recently issued Executive Order 14096 "Revitalizing Our Nation's Commitment to Environmental Justice for All" (April 21, 2023) which direct . Executive Order 14096 states that the definition of "Federal activity" means any agency rulemaking, guidance, policy, program, practice, or action that affects or has the potential to affect human health and the environment, including an agency action related to climate change. Federal activities may include agency actions related to: assuring compliance with applicable laws;awarding, conditioning, or oversight of Federal funds; and managing Federal resources and facilities. Moreover, Section 3. (X) states that "(a) Consistent with section 1101 of Executive Order 12898 and each agency's statutory authority, each agency should make achieving environmental justice part of its mission. Each agency shall, as appropriate and consistent with applicable law.... (x) in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, and agency regulations, ensure that all programs or activities receiving Federal financial assistance that potentially affect human health or the environment do not directly, or through contractual or other arrangements, use criteria, policies, practices, or methods of administration that discriminate on the basis of race, color, or national origin;"</p> <p>Executive Order 14096 requires NSF and other Federal agencies to make its Environmental Justice Strategic Plan available within 18 months of the date of the executive order. NSF encourages awardee organization to visit the Environmental Justice Scorecard for updates or changes to NSF regulations, policies, procedures and practices related to the implementation of the Environmental Justice executive orders.</p> <p>NSF will clarify these requirements in the latest revisions to the PAPPG and make the correction requested about the erroneous sentence to paragraph 8a.</p>
86	American Council on Education	Foreign Gifts and Contracts Disclosures	VII.D.3	VII-10-11	<p>We appreciate the opportunity to comment on the proposed implementation of this new preaward reporting requirement for the NSF. Our institutions take seriously our reporting obligations under Section 117 and other provisions, such as this newly created reporting requirement, regarding foreign gifts and contracts. We are aligned with the federal government regarding concerns around improper foreign influence and research security. However, we have been disappointed by the lack of engagement and continuing confusion around Section 117 reporting to the Department of Education (ED), and we believe the system remains in need of substantial additional work. While we have engaged extensively with the department in notice and comment to create its Information Collection Request (ICR), we continue to believe the system would be more useful if the department more fully engaged directly with the stakeholder community in creating processes and answering questions about current Section 117 requirements. Therefore, we ask NSF during this process to engage with the higher education community in substantial conversations regarding the creation of the reporting portal, and implementation of this statute.</p> <p>While this new reporting requirement to NSF is similar, there are also some major differences with Section 117. NSF's reporting is meant to be an annual report, while Section 117 requires biannual reports (January 31 and July 31). The NSF reporting requirement also only applies to "countries of concern," while Section 117 was established to apply to any gift from a foreign source. The biggest difference is the reporting threshold under Section 117 is \$250,000, while under the new NSF disclosure the reporting threshold is \$50,000. These differences will likely create confusion and additional reporting burdens for our institutions. Both NSF and ED have publicly noted that these two reporting requirements may be duplicative and that there needs to be consistency in approach to reduce burden. Because of this, both ED and NSF should commit to engaging with the stakeholder community to ensure consistency, reduce regulatory burden for institutions, and work together regarding the continuing confusion around definitions and expectations in what institutions are reporting.</p>	<p>Thank you for your comment. NSF agrees that additional stakeholder input may be helpful as NSF finalizes its reporting portal for the "Foreign Gift and Contract Disclosure" required by Section 10339B of the CHIPS and Science Act and NSF anticipates working with stakeholders to obtain informal user input before the reporting portal goes live on the July 31, 2024 implementation date.</p>
87	American Council on Education	Foreign Gifts and Contracts Disclosures	VII.D.3	VII-10-11	The CHIPS and Science Act states "the Director shall request...a disclosure, in the form of a summary document." However, this proposed implementation implies that institutions will have to report each individual gift or contract over \$50,000 rather than a summary. This will be incredibly burdensome for institutions of higher education. We ask that the final implementation of this reporting requirement clarify that institutions will only need to report summaries, rather than individual reports for gifts and contracts over \$50,000.	Thank you for your comment. NSF believes that details provided under the "Foreign Gift and Contract Disclosure" required by Section 10339B of the CHIPS and Science Act ensure the information's validity and reliability.
88	American Council on Education	Foreign Gifts and Contracts Disclosures	VII.D.3	VII-10-11	Section 10339B reads "... gifts and contracts, received directly or indirectly from a foreign source (as such term is defined in section 117 of the Higher Education Act of 1965 (20 U.S.C. 1011f(h)(2))) associated with a foreign country of concern." This language does not seem to include regular tuition payments from individual students and families. However, the lower \$50,000 threshold will likely capture tuition payments from individual foreign parents and families for international students studying at U.S. institutions of higher education. We ask that the final PAPPG clarify that this new disclosure is not meant to capture tuition for individuals, except in such cases where tuition payments are made from foreign embassies or consulates as part of foreign government sponsorship programs for international students.	Thank you for your comment. Tuition payments from an individual for a specific student(s) are excluded from the reporting requirement under Section 10339B of the CHIPS and Science Act of 2022 (e.g., parent payment for child/children or other relatives). However, if the payment of tuition is in the form of a grant, scholarship or other form of financial aid that is conditioned on a specific criterion (e.g., the student's major – student studying a particular language; or the student's country of origin – all students from a particular country), but not for the benefit of a specific student, that payment is reportable when the aggregate threshold of \$50,000 from a foreign source is met.
89	American Council on Education	Foreign Gifts and Contracts Disclosures	VII.D.3	VII-10-11	<p>The proposed "Foreign Gifts and Contracts Disclosure" incorporates many of the same definitions and terms as Section 117, including names and addresses of foreign sources. We continue to be concerned about the reporting of names and addresses of individual foreign donors, which is at odds with the common practice at many institutions of allowing individual donors, including those living in other countries, to request confidentiality in their giving. As we have also expressed to ED, we are also concerned about the slippery constitutional slope of institutions disclosing the names of natural-person donors. Recently, in striking down a state's donor disclosure law applicable to nonprofits, the Supreme Court based its holding on the well-established First Amendment right of nonprofit organizations not to disclose confidential donor information because of the risk that public disclosure could potentially chill associational rights.</p> <p>In addition, as we have expressed to ED in March 2020 comments on the Section 117 ICR, we are concerned that the disclosure of names and addresses of donors requesting confidentiality could jeopardize the safety of some foreign individuals, especially those from countries of concern.4 Potential examples include:</p> <ul style="list-style-type: none"> * a foreign individual from a religious minority in his or her home country who makes a donation to a religiously affiliated college could be subject to reprisal and religious persecution; * an individual donor from a country where many believe females should not be educated who makes a gift to support college tuition for young women; * an individual or entity donation from a Middle Eastern country to support research on Islamic fundamentalism and its connection to ISIS or other designated terrorist groups; * an individual or entity donation from Russia to support research on corruption under Putin's regime; or * an individual or entity donation from a country plagued by regular kidnapping of the affluent or perceived affluent for ransom. <p>We ask that, in final implementation, NSF not require individual names and addresses of donors, since the policy specifically asks for a summary of donations, rather than individual names and addresses.</p>	<p>The purpose of the reporting requirements under Section 117 of the Higher Education Act of 1965 as amended is to ensure transparency of all reportable financial gifts from and contracts with foreign sources. The purpose of Section 10339B of the CHIPS and Science Act for foreign gift and contract disclosures from the identified countries of concern is national security. Given these different purposes, NSF believes that collecting names and addresses for the "Foreign Gift and Contract Disclosure" required by Section 10339B of the CHIPS and Science Act is ensuring ensures the information's validity and reliability. Regarding concerns that this specific information (name and address) not be publicly disclosed, NSF will not proactively disclose this specific information publicly given privacy concerns. If NSF receives a FOIA or other request for this specific information (name and address), it will be protected to the extent allowed by law.</p>
90	American Council on Education	Foreign Gifts and Contracts Disclosures	VII.D.3	VII-10-11	Under the CHIPS and Science Act, NSF is requesting a summary document "from a recipient institution of higher education," a disclosure "from the institution, a foundation of the institution, and related entities such as any educational, cultural, or language entity." We are concerned about our institutions' ability to collect information from foundations or related entities, which may be completely, legally separate from the institutions, with their own staff and governing boards, under the Internal Revenue Code's Sec. 501(c)(3) and/or Sec. 509(a)(3). An institution is unlikely to have any authority over such organizations and may be unable to compel the release of data. It would be helpful for NSF to engage in more substantial conversations with the stakeholder community about how to define such foundations and related entities to help reduce the burden in the collection of this data, as well as to clarify "related entities."	Thank you for your comment. NSF appreciates that different IHEs may have different relationships with their related entities. The statute requires the disclosure be made by "the institution, a foundation of the institution, and related entities such as any educational, cultural, or language entity" under Section 10339B(a). NSF expects each IHE to coordinate with their related entities and expressly state, when completing its required annual report, which entities are included in that report.
91	American Council on Education	Foreign Gifts and Contracts Disclosures	VII.D.3	VII-10-11	As NSF works to finalize the implementation of the "Foreign Gift and Contract Disclosure" requirements, we also ask that the agency substantially engage with the stakeholder community in creating the reporting tool, including asking for technical feedback. There are numerous limitations with the current Section 117 reporting portal; however, there has not been any opportunity to provide technical feedback on the portal. A user-friendly reporting portal would greatly reduce burden and enhance the quality of information being reported. Our associations, and members institutions, continue to be committed to responding to foreign gift and contract reporting requirements, as these issues become even more important to the public and policymakers. We hope NSF will continue to work with higher education stakeholders in regular and substantial engagement on the final implementation of this new reporting requirement.	Thank you for your comment. NSF agrees that stakeholder input may be helpful as NSF finalizes its reporting portal for the "Foreign Gift and Contract Disclosure" required by Section 10339B of the CHIPS and Science Act and NSF anticipates working with stakeholders to obtain informal user input before the reporting portal goes live on the July 31, 2024 implementation date.
92	The Wildlife Society	Tribal Nations	II.E.10	II-43	<p>We recommend that the NSF consider how processes outlined in the PAPPG will interact with the resources currently available to tribes for engaging with and reviewing research proposals and funding opportunities. These procedures could create an additional burden on tribes which may have no dedicated institution for engaging with these processes.</p> <p>Tribes engaging with the NSF funding process should be provided with a clear avenue for communicating concerns about proposals with identified impacts on tribes, and we recommend continued engagement with tribal nations throughout the implementation of revisions to the PAPPG.</p>	Thank you for your comment. Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission.

Number	Comment Source	Topic	PAPPG Reference(s)	PAPPG Page Numbers	Comment	NSF Response/Resolution
93	The Wildlife Society	Tribal Nations	I.E.1.c	I-6	Replace the term "Tribal Government" with "Tribal Nation". The NSF currently acknowledges that there are tribes recognized by states but unrecognized by the federal government. We urge the NSF to engage with those communities during research and education initiatives. NSF proposal eligibility criteria should make the distinction between tribal researchers and tribes conducting research, thus allowing for non-Native researchers to appropriately engage with tribes after tribes have agreed to the association with said research on a free, prior, and informed consent basis. The NSF should also recognize that individual tribal citizens should be able to provide proof of tribal citizenship if their claim of citizenship is being incorporated into their request for NSF funding. Tribes should be provided with a clear process to engage with the NSF if an individual's claims to tribal citizenship are shown to be false. It should be clearly established that tribes carry the final determination of individual citizenship and descentancy, and the NSF should incorporate a commitment to revoke award funding within the current grant period in cases where claims of tribal citizenship are shown to be false.	Thank you for your comment. NSF has replaced "Tribal Government" with "Tribal Nation" throughout the PAPPG. This proposed language is not intended to address eligibility criteria for PIs, though a specific program solicitation may impose limitations on a PI's eligibility.
94	The Wildlife Society	Tribal Nations	II.D.2.i(iv)	II-34	This section of the PAPPG should include language identifying the NSF as the responsible party for the review, assessment, and assurance that awards approved for funding have followed the established guidelines, and either do not impact tribal resources or otherwise comply with Federal Environmental Statutes. This process may otherwise be overly burdensome to tribal communities, especially those without dedicated institutions and/or internal processes for research review.	Thank you for your comment. Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission. Please also note that there are no timelines associated with this new language and Tribal Nations can follow whatever timeline works best for them. Please also note that NSF will ensure that environmental reviews are conducted in compliance with federal environmental laws prior to an NSF award being made. Please note that an award will not be made absent Tribal Nation approval.
95	The Wildlife Society	Tribal Nations	II.E.10	II-43	Section E(10)(d) currently states that "NSF funding for a proposal that includes an activity that requires prior approval from a Tribal Nation or Tribal Nations will not be awarded until the required documented approval from the relevant Tribal Nation(s) has been submitted to NSF." This condition may prove burdensome or challenging for tribes whose policies relating to research do not align with NSF funding timelines. We recommend NSF revise this condition to instead implement a period where funding is "tentatively awarded" based on assurances that the applicant secures the appropriate tribal permissions and follows any applicable tribal laws and policies governing research, data sovereignty and publication. If tribes do not currently have these laws/policies in place, the applicant should provide a letter of support from the appropriate tribal governing body (i.e. business or community council) within a defined period of time. Review of permissions during this "tentatively awarded" period should be the responsibility of the NSF, as this process is burdensome for tribal communities. This portion of the PAPPG should also include a requirement that applicants describe any plans for data sharing and future publication agreements and have a formalized and jointly agreed upon agreement prior to the end of the award period. Recognizing the critical importance of data sovereignty in this context, we recommend the PAPPG reference and recommend adherence to the CARE Principles relating to protections for indigenous data sovereignty as described by Carroll et. al (2020).	Thank you for your comment. Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission. Please also note that there are no timelines associated with this new language and Tribal Nations can follow whatever timeline works best for them.
96	Navigating the New Arctic Community Office (NNA-CO)	Tribal Nations	II.E.10	II-43	The proposed changes in the PAPPG will likely impact Tribes in both positive and negative ways, depending on implementation. The intent of the proposed revisions requiring researchers to seek and obtain "Tribal Nation permission for proposals that may impact Tribal resources or interests" indicates a notable and positive step forward. However, implementation may result in undue burden on Tribes and, secondarily, on researchers, especially if adequate guidance and resources are not provided to support the engagement process. In general, we understand that the proposed revisions require principal investigators (PIs) to: (1) engage with Tribes to assess whether the research is impacting the resources or interests of Tribes; (2) if the answer is yes, seek Tribal guidance on what aspects of the proposed work require review and Tribal approval; and (3) based on Tribal guidance, submit a request to the Tribes for approval.	Thank you for your comment. Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission. Please also note that there are no timelines associated with this new language and Tribal Nations can follow whatever timeline works best for them.
97	Navigating the New Arctic Community Office (NNA-CO)	Tribal Nations	II.E.10	II-43	Proposed revisions seemingly require the proposal's principal investigator (PI) to initially assess and acknowledge potential impact(s) on Tribal resources and interests. Some PIs may interpret these revisions as requiring an assessment of primarily negative impacts. This should be clarified by requesting that PIs acknowledge both negative impacts and positive impacts (benefits) so that Tribes have a more complete/holistic context when considering whether to approve projects. Additionally, the revisions may be strengthened by clarifying what may constitute engagement best-practices, which should include the researcher(s) holding discussions with the Tribe(s) to increase understanding and to potentially agree to mutually beneficial outcomes.	Thank you for your comment. Regarding your concern about which resources and interests are covered by this provision, NSF has determined that when the PAPPG is officially implemented, its application will be initially limited to Tribal lands or those aspects of Tribal life that are within the domain of the Tribal Nation (as opposed to individual Tribal members), including but not limited to Tribal languages and subsistence rights on Tribal Nation lands. Regarding your concern about how potential proposers will determine if a research idea would impact Tribal interests and hence require Tribal permission, please note that the intent of this provision is to ensure Tribal Nation interests and resources are respected and to encourage early engagement and meaningful collaboration with the Tribal Nation(s).
98	Navigating the New Arctic Community Office (NNA-CO)	Tribal Nations	II.E.10	II-43	The examples provided for projects with potential Tribal impacts (for example, "the participation of Tribal citizens in research as collaborators/consultants/subject matter experts pertinent to a specific Tribal Nation; the participation of Tribal citizens as human subjects in a study (note that this type of proposal may also require a separate Tribal IRB); carrying out studies or research on Tribal reservations, territories, and other locations where Tribes have legally protected rights to resources or to engage in activities; and using Indigenous Knowledge or Tribally controlled information or data in research.") are helpful. It seems appropriate and important to include reference to relevant Executive actions, namely the Executive Memorandum on "Indigenous Traditional Ecological Knowledge and Federal Decision Making" (Nov 15, 2021) and the Executive "Guidance for Federal Departments and Agencies on Indigenous Knowledge" (Nov 30, 2022). Such guidance will be important for showing that there are federal guidance/orders/statutes for engaging with Tribes and Indigenous Peoples beyond the Federal Environmental Statutes, such as the National Environmental Protection Act (NEPA), the National Historic Preservation Act (NHPA), and the Endangered Species Act (ESA), which are highlighted in Section II.D.2.1.	Thank you for your comment. NSF appreciates your suggestion to include references to the Executive Orders and Presidential Memoranda addressing Indigenous Knowledge and revisions have been implemented to include these references.
99	Navigating the New Arctic Community Office (NNA-CO)	Tribal Nations	II.E.10	II-43	PIs seeking Tribal review, guidance, and potential approval may overwhelm many Tribes. Most Tribes in Alaska do not have research or IRB protocols or the resources to support their development and implementation. Therefore, many Tribes may choose not to engage in the process. Ideally, funding and support opportunities for Tribes should be created and/or identified to support Tribal reviews in the short-term and to assist in building Tribal capacities in the long-term. Additionally, an unintended consequence may be that many researchers/PIs may choose to design and submit research proposals that do not require Tribal input or collaboration. NSF may consider suggesting a more than adequate time frame for this engagement to be completed, encouraging PIs to allow for several months to a year for the approval process and to support relationship building and equitable engagement (e.g., see the Circumpolar Inuit Protocols for Equitable, Ethical Engagement protocols: https://www.inuitcircumpolar.com/project/circumpolar-inuit-protocols-for-equitable-and-ethical-engagement/). PIs should be encouraged to consider developing relationships and agreements that support reciprocity and accountability within research (see the "Principles for Conducting Research in the Arctic" by the Interagency Arctic Research Policy Committee, 2018, Washington D.C.). An additional best-practice for researchers engaging Tribes may be to encourage researchers to provide general information about NSF funding rates, as an effort to communicate the uncertainty and competitive nature of research proposals submitted to NSF. This will help Tribes make decisions about investing their time and resources in supporting and/or engaging with prospective PIs.	Thank you for your comment. Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission. Please also note that there are no timelines associated with this new language and Tribal Nations can follow whatever timeline works best for them.
100	Navigating the New Arctic Community Office (NNA-CO)	Tribal Nations	II.E.10	II-43	The proposed policy changes appear to allow proposals to be submitted to NSF with only their "written request to the relevant Tribe(s) to carry out their proposed activities/activity that require(s) prior approval from the Tribal Nation(s)". This implies that such proposals would be peer-reviewed prior to Tribal approval. This could lead to the situation where proposals are recommended for funding but not awarded until Tribal approval is granted, which could put Tribes in the position of being the final "barrier" to an award being made. This could lead to undue pressures on Tribes by PIs and universities who are eager to receive funding. This language could be adjusted to require Tribal approval as part of the initial proposal submission.	Thank you for your comment. NSF wants to be respectful of Tribal Nation's time and will not require the Tribal Nation's approval prior to submission of the proposal to NSF. However, an award will not be made absent Tribal Nation approval. The intent of this provision is to ensure Tribal Nation interests and resources are respected and to encourage early engagement and meaningful collaboration with the Tribal Nation(s).
101	Navigating the New Arctic Community Office (NNA-CO)	Tribal Nations	II.E.10	II-43	The proposed changes allow proposals to be submitted with "written permission from the Tribal Nation(s) to engage in an initial phase for planning collaboratively", implying that this phase would happen after the award is granted. It would be appropriate for NSF to require this planning phase to be adequately represented in the project timeline and budget, and require proposals to have developed contingency plans if the collaborative planning phase does not result in a shared vision or interest with the Tribe or does not adequately address Tribal interests. As an alternative, NSF may consider developing a process for collaborative planning proposals with Tribes that could be granted in advance of the research proposal.	Thank you for your comment. The intent of this provision is to ensure Tribal Nation interests and resources are respected and to encourage early engagement and meaningful collaboration with the Tribal Nation(s). NSF has removed the language about the planning phase to avoid potential confusion with regard to the requirements for prior approval from the Tribal Nation.
102	Navigating the New Arctic Community Office (NNA-CO)	Tribal Nations	II.E.10	II-43	Proposed revisions provide context for when "Tribal reservations, territories, and other locations where Tribes have legally protected rights to resources or to engage in activities." It is not clear whether the Alaska context, with the presence of Tribes, Tribal organizations and consortia, and Alaska Native Corporations, has been considered. This should be clarified. Also, the current PAPPG revisions apply to federally recognized Tribes. There are many unrecognized Tribes, as well as Native Hawaiians, and Tribal organizations and consortia who would benefit from being included. These organizations are often in service to Tribes and provide critical support, administration, and capacity. The reference to Tribes could be revised to include "Tribal organizations and consortia".	Thank you for your comments. We understand that the proposed language may result in unintended consequences due to the definition of Tribal resources and interests. Please note that when the PAPPG is officially implemented, its application will be initially limited to Tribal lands or those aspects of Tribal life that are within the domain of the Tribal Nation (as opposed to individual Tribal members), including but not limited to Tribal languages and subsistence rights on Tribal Nation lands. Regarding your comment that non-federally recognized Indigenous communities should be included in this new provision, NSF recognizes that there are challenges to including these Indigenous communities but continues to explore implications of what such a change would mean, to both NSF and the Tribal Nations.

Number	Comment Source	Topic	PAPPG Reference(s)	PAPPG Page Numbers	Comment	NSF Response/Resolution
103	Navigating the New Arctic Community Office (NNA-CO)	Tribal Nations	II.E.10	II-43	The revised PAPPG does not address training around these updates, potential requirements, and the right of refusal held by Tribes. Training for Tribes, Tribal organizations and consortia is needed to ensure all impacted are aware of these changes. Funding is also needed to support these organizations in creating processes and governance bodies to fully respond to requests from researchers.	Thank you for your comment. Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission. Given the unique context of each Tribal Nation, processes could have significant differences; thus, training that applies to all such processes would neither be practical nor appropriate for NSF to develop.
104	Navigating the New Arctic Community Office (NNA-CO)	Tribal Nations	II.E.10	II-43	On May 31, 2023, the NNA-CO organized and hosted an informational webinar session with NSF representatives to discuss the proposed revisions to the PAPPG and to answer participant questions. Over 40 people attended, including researchers, community engagement professionals, Arctic Indigenous scholars and community members, and NSF officials. A recording of the session is available on the NNA-CO website (https://www.nna-co.org/specialsession-nsf-representatives-discuss-proposed-revisions-pappg-related-tribal-engagement). Several participants acknowledged that researchers seeking Tribal Nation approval for research that impacts Tribes is very important and is good to have addressed in NSF proposal policies and procedures. Below is a summary of some of the comments, concerns, and questions that were raised; many have been slightly revised for length and clarity (any mistakes are those of the NNA-CO, which hosted the session and captured high level notes). * If a Tribal nation denies approval, what are the implications for the NSF proposal process? *Additional guidance would help clarify the timeline for proposers, Tribal review, or deadlines for proposal submissions. For example, Tribal Councils may have a process that includes review by other advisory bodies and that can take months. Tribes often have layers of consent, from individual to community level approvals. There was a suggestion for more rolling grant deadlines (rather than specific deadlines) to provide more flexibility when working with Tribes. *How does a PI know if their proposal may impact Tribal resources or interests? It will be important to provide resources for PIs to assist in determining Tribal impacts or interests. *The governance landscape in Alaska is complex. Would a PI need to get approval from all entities – Tribes, Alaska Native Village Corporations, Alaska Native Regional Corporations, etc. – that might be impacted by proposed research? *How will Tribes receive clear guidance or training on their rights through these new policies and procedures if they go into effect? *How do these proposed new guidelines relate to when Tribes themselves are serving as PI on a proposal that has an impact on Tribal resources and interests? For example, if the Tribal president is the PI and the Tribe a project partner, would approval be implicit? *What happens if consent from a Tribal Government is revoked after a project is awarded? For example, if Tribal leadership changes after a research award is granted, and as a result Tribal approval gets revoked, would the project need to be discontinued? *Is there any guidance on how research institutions are to communicate with Tribal governments?	Thank you for your comment. Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission. Regarding concerns about timelines, please note that there are no timelines associated with this new language and Tribal Nations can follow whatever timeline works best for them. NSF takes the position that it is the Tribal Nation that determines how review of a PI's proposed research that could impact a Tribal Nation's resources or interests should take place as well as whether permission should be approved or denied. Please note that when the PAPPG is officially implemented, its application will be initially limited to Tribal lands or those aspects of Tribal life that are within the domain of the Tribal Nation (as opposed to individual Tribal members), including but not limited to Tribal languages and subsistence rights on Tribal Nation lands. Regarding your question about if a Tribal Nation revokes its approval post award, NSF will address such situations on a case-by-case basis.
105	Navigating the New Arctic Community Office (NNA-CO)	Tribal Nations	II.E.10	II-43	Continued high level notes from webinar session with NSF: *Is there something in the proposed policies that requires the PI to first ask the Tribes if the proposed research is something that the Tribe may need and want and if it furthers Tribal plans and interests. Are there requirements for the PI to ask Tribes what their current research needs are? Will there be guidance for the PI to make this process go smoothly for Tribes and take some of this work load off of Tribes? Tribes get a lot of requests and this would add to their workload. *Will NSF be able to fund small approval-seeking grants for Tribes to review proposals? It takes time and money to co-produce projects and to seek equitable input on proposed activities. *How will NSF determine if a proposal is fulfilling the requirement for Tribal approval? It will be important to have compensated Indigenous reviewers (including community members and Elders) and NSF program staff to help determine if a proposal is fulfilling these goals. *Are there ways for these proposed revisions to include reference to Indigenous Peoples in the Pacific and state recognized or unrecognized Tribes, recognizing that their Indigenous sovereignty is inherent? *Has NSF considered the potentially negative impacts of these PAPPG revisions, e.g. potentially fewer proposals that include Tribes being submitted? There was a suggestion for NSF internal tracking to include a parameter for 'involvement of Indigenous communities' in the same way that NSF already tracks 'involvement of Tribal Colleges'. This will allow for assessment of the outcomes of these proposed revisions. If proposals that involve Tribes and Indigenous communities decline, NSF may consider a Tribal set aside as an incentive to ensure that research includes Tribes.	Thank you for your comment. Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission. NSF acknowledges your concern about non-inclusion of Indigenous communities and nonprofit organizations that are not federally recognized in this proposed language. NSF recognizes that there are challenges to including these Indigenous communities but continues to explore implications of what such a change would mean, to both NSF and the Tribal Nations.
106	Raymond Foxworth	Tribal Nations	N/A	N/A	New NSF standards and practices must seriously consider Indigenous Data Sovereignty. Indigenous communities across the globe are actively mobilizing to create new research practices and standards that govern research on and with Indigenous peoples. In many cases, the need for new research standards and practices is motivated by the fact that researchers and agencies that govern research practices (including university IRBs and others institutions) do not take seriously the needs and demands of Indigenous communities, leaving them open for continued exploitation by researchers (sometimes intentionally, sometimes not). Part of these new practices and standard calls for researchers to abide by CARE principles.1 As Carroll, Herczog, Hudson, Russel and Stall note in their article in Scientific Data note: The CARE Principles detail that the use of Indigenous data should result in tangible benefits for Indigenous collectives through inclusive development and innovation, improved governance and citizen engagement, and result in equitable outcomes.3. Collective benefit is more likely to be realized when data ecosystems are designed to support Indigenous nations and when the use/reuse of data for resource allocation is consistent with community values. UNDRIP asserts Indigenous Peoples' rights and interests in data and their authority to control their data. Access to 'data for governance' is vital to support self-determination and Indigenous nations should be actively involved in 'governance of data' to ensure ethical reuse of data. Given the majority of Indigenous data is controlled by non-Indigenous institutions there is a responsibility to engage respectfully with those communities to ensure the use of Indigenous data supports capacity development, increasing community data capabilities, and the strengthening of Indigenous languages and cultures. Similarly, Indigenous Peoples' ethics should inform the use of data across time in order to minimize harm, maximize benefits, promote justice, and allow for future use. The CARE Principles are designed to be complementary to the FAIR Principles, Findable, Accessible, Interoperable, Reusable, and other mainstream data frameworks, and promote equitable participation and outcomes from data access, use, reuse, and attribution in contemporary data landscapes. Given the tension between protecting Indigenous rights and interests in data while encouraging FAIR data in a global research environment that also supports open data, implementation of the CARE Principles should be seen as a required dimension of open and FAIR data that ensures the use of data aligns with Indigenous rights, is as open as determined by Indigenous communities, is purposeful, and enhances the wellbeing of Indigenous Peoples. NSF should consider including CARE principles into their standards when proposals engage with Tribal nations.	Thank you for your comment. The intent of this provision is to ensure Tribal Nation interests and resources are respected and to encourage early engagement and meaningful collaboration with the Tribal Nation(s). In addition, Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission.
107	Raymond Foxworth	Tribal Nations	I.E.1.c	I-6	Native Hawaiians or Native Hawaiian Communities are not mentioned as part of your definition of Tribal Nations thus they are excluded from NSF procedures regarding working with Indigenous governments. Native Hawaiians do indeed have a separate legal status than Native American nations but are nonetheless Indigenous peoples and many federal agencies treat Native Hawaiian communities under the same operating procedures as they do Native nations. Moreover, some federal legislation (like the Native American Graves Protection and Repatriation Act as one example) provides Native Hawaiians and Native Hawaiian Communities similar protections under the law to Native American nations. Greater consider needs to be given to protecting Native Hawaiians.	Thank you for your comment. NSF acknowledges your concern about the non-inclusion of Indigenous communities and nonprofit organizations that are not federally recognized in this proposed language. NSF recognizes that there are challenges to including these Indigenous communities but continues to explore implications of what such a change would mean, to both NSF and the Tribal Nations.
108	Raymond Foxworth	Tribal Nations	II.E.10	II-43	Greater detail on how NSF will review new standards. These changes do not give any clarity as to how NSF will operationalize these policy changes in review panels. Most academics do not understand tribal sovereignty, tribal IRBs or the extra care that is required in studying "small," "hard to reach" and/or communities that have been exploited by academic researchers—all realities of Indigenous communities. There needs to be a clear understanding to applicants of how NSF will monitor applications that have any impact on Native nations. Currently it reads as if there will be a check list of forms with no evaluation of completeness, relevancy, etc.	Thank you for your comment. Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission. Given the unique context of each Tribal Nation, processes could have significant differences; thus, NSF recognizes that development of a single checklist that applies to all such processes would neither be practical nor appropriate.
109	Raymond Foxworth	Tribal Nations	II.E.10	II-43	Data collection that may involve subjects on Tribal lands. Today, in the world of big data, there is data being collected on individuals who live on tribal lands by researchers without tribal consent and this ranges from survey data to genetic data—and these kinds of data collection studies are funded by NSF. These changes make no mention of how NSF will ensure tribal consent with these advancements in technology and sampling strategies that have a direct impact on tribal nations. While studies may not have a direct impact on Native nations, if there is any possibility of research recruitment (actively or inactively), then researchers need to abide by tribal IRB standards. Currently, these new NSF guidelines only apply to researchers who propose studies that mention a direct impact a Tribal community. But data collection by Native people who reside on Native nation land is occurring. NSF needs to pay attention to these advancements in data collection and how they will work to safeguard tribal communities and subjects in this environment of big data and advancements in data collection that skirts tribal sovereignty and consent.	Thank you for your comment. The intent of this provision is to ensure Tribal Nation interests and resources are respected and to encourage early engagement and meaningful collaboration with the Tribal Nation. In addition, Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission.
110	NSF OIG	General Comment	Introduction A.	viii	STEM typically refers to Science, Technology, Engineering and Mathematics.	Thank you for your comment. This update has been incorporated.

Number	Comment Source	Topic	PAPPG Reference(s)	PAPPG Page Numbers	Comment	NSF Response/Resolution
111	NSF OIG	General Comment	Introduction A.	viii	The additional DEIA text that encourages participation from groups underrepresented in STEM: We suggest adding language to better clarify whether this section refers to NSF's efforts to broaden participation internally, externally, or both.	Thank you for your comment. The text applies to the external community. To clarify this point, the sentence: "NSF highly encourages the leadership, partnership, and contributions in all NSF opportunities of individuals who are members of such communities." was modified as: "NSF highly encourages the leadership, partnership, and contributions in all NSF opportunities of individuals who are members of such communities supported by NSF."
112	NSF OIG	NSF Disclosure Requirements	II.B.1 II.B.2	II-2	We suggest additional language could be added to clarify whether initial disclosures should be submitted through sciENcv. Perhaps this could be accomplished by including a footnote that refers to the Proposal Contents section within Chapter II that describes the explicit use of sciENcv for multiple disclosure documents. Providing this information in both sections will help ensure recipients appropriately comply with the new requirements.	Thank you for your comment. The NSF disclosure requirements section is not the appropriate location to specify how such information should be submitted. Rather, the appropriate location is the biographical sketch and current and pending (other) support section of the PAPPG.
113	NSF OIG	Biographical Sketch	II.D.2.h(i)	II-26	We suggest that additional language should be added to the "Biographical Sketches" section to make this section parallel to the "References Cited" section (pg II-14) where the PAPPG states "Each reference must include the names of all authors (in the same sequence in which they appear in the publication[Emphasis Added]), the article and journal title..." We have had a case in the past where a PI manipulated the order of authorship in the Biographical Sketches section multiple times to make their contribution appear larger than it was.	Thank you for your comment. It is not possible to accommodate this request as NSF has already made the determination that senior personnel who wish to include publications in the Products section of the biographical sketch that include multiple authors may, at their own discretion, choose to list one or more of the authors "et al" in lieu of including the complete listing of authors' names. This also is consistent with the Biographical Sketch Common Form that is currently being cleared by Federal Research Funding Agencies.
114	NSF OIG	Federal Environmental Statutes	II.D.2.i	II-34	We suggest that the PAPPG should also mention the Marine Mammal Protection Act 16 U.S.C. 1361 as a significant Federal Statute affecting research compliance for which the agency has numerous authorizations for geological survey projects on NSF vessels.	Thank you for your comment. NSF complies with numerous federal environmental statutes. The 2023 PAPPG text highlights a few statutes which have relevancy for the greatest number of NSF proposals, with the text noting, "...including, but not limited to the National Environmental Policy Act (42 USC §4321, et seq.), the National Historic Preservation Act (54 USC §306108 [previously codified at 16 USC §470, et seq.], and the Endangered Species Act (16 USC §1531, et seq.)...". The Marine Mammal Protection Act 16 U.S.C. 1361 (MMPA) is typically relevant to a smaller subset of NSF proposals, such as marine geophysical research using active seismics which involve on the order of 10 proposals per year. While for these reasons we did not cite the MMPA in the PAPPG, the NSF Organizational Checklist, which is referred to in the PAPPG text, includes instructions which emphasizes attention to potential impacts on marine mammals. Additionally, the OGC EC Team provides targeted outreach and training on NSF environmental compliance, including obligations pursuant to the MMPA, to the marine geophysics community such as during University-National Oceanographic Laboratory System (UNOLS) Marine Seismic Research Operations Committee (MSROC) meetings.
115	NSF OIG	Tribal Nations	II.E.10	II-43	We suggest NSF consider instead specifying "known Tribal citizens." Or consider adding guidance about specific verbiage that could be included in surveys or educational research to elicit tribal citizenship disclosure by collaborators/consultants/SMs or survey participants. Does this section require tribal nation permission in order for a tribal citizen to be able to participate in any NSF-funded educational or research opportunity (e.g. research assessing different methods of teaching math)?	Thank you for your comments. For proposed research that works with Tribal Nation members, the PI will need permission from the Tribal Nation if the PI seeks to invoke the Tribal Nation in any way (including but not limited to materials, public forums, or publications.) The Tribal Nation that gives the permission may also require Tribal IRB depending on the role the Tribal members may play. If Tribal members (enrolled citizens whether urban or reservation living) voluntarily participate, they can do so but will not be considered as a Tribal representative.
116	NSF OIG	NSF Policy on Sexual Harassment, Other Forms of Harassment, or Sexual Assault	XI.A.1.g	XI-2-3	We suggest that NSF expand its policy to require notification from awardee institutions for allegations/complaints against PIs/co-PIs. This type of notification should not be considered a presumption of guilt nor would it trigger a direct actionable response from NSF. Rather, this knowledge would simply make NSF aware of potential issues to follow-up on when working with specific PIs & Co-PIs in the future. For example, this information could prompt NSF to follow-up with an institution on the status of an allegation if the individual in question is being considered as a PI or Co-PI for a new award. This policy would be one step further for NSF in maintaining the integrity of the US Research Enterprise and ensuring safe and harassment-free workplaces while at the same time still allowing for institutional due process to play out.	Thank you for your comment. We anticipate considering suggestions such as this one as part of Section 10536 of the CHIPS and Science Act of 2022, which requires the establishment of an interagency working group purposed with coordinating federal research agency efforts to reduce the prevalence of sex-based and sexual harassment involving award personnel. Among other duties, the working group must develop policy guidelines for federal research agencies. Agencies must implement policies regarding sex-based and sexual harassment that are consistent with the guidelines.
117	NSF OIG	Research Misconduct: NSF Policies and Responsibilities	XII.C.1	XII-4	We suggest considering a footnote, embedded link, cross-reference to, or incorporation by reference thereof to the QCR method of assessing plagiarism (Quotation, Citation, and Reference), found here: https://oig.nsf.gov/sites/default/files/document/2022-10/QCR.pdf .	Thank you for your comment. NSF concurs with the feedback and a reference to the Foundation's Research Misconduct Regulation has been added to Chapter 12.
118	NSF OIG	Reporting Possible Misconduct	XII.C.3	XII-6	We suggest NSF consider including an email address below the anonymous phone number or our new website statement. "For general inquiries about reporting fraud, waste, and abuse: oig@nsf.gov." Or "For general inquiries about reporting fraud, waste, and abuse contact NSF OIG."	Thank you for your comment. This update has been incorporated.
119	Kawerak, Inc; Aleut Community of St. Paul; Association of Village Council Presidents; Bering Sea Elders Group	Tribal Nations	II.E.10	II-43	We support NSF's recognition of underrepresented and underserved communities in STEM fields, as well as the attention to environmental justice as relates to minority and low-income populations, in the proposed changes. We also applaud the increased attention NSF will place through these PAPPG changes on the impacts of research on Tribal Nations, and the importance of researchers working collaboratively with Tribes and obtaining Tribal permission for research which has impacts on Tribes. With regard to proposal-related requirements pertaining to Tribes as outlined in Chapter 2 Section E(10), we encourage a broad interpretation of activities which require review and approval by Tribal Nations. Acknowledging that the bulleted list in this section is meant only as examples, we also stress the need for the requirement for Tribal review and approval to extend to research activities being proposed on or within traditional Tribal lands or waters, as well as research that has impacts on resources which, if impacted, Tribes would perceive as having had impacts on the Tribe itself. What may or may not have an impact is a culturally-defined question, understandings of which may vary significantly between Tribes and non-Tribal researchers (see e.g. Bielawski 1992, 1996, Fienup-Riordan 1999, Raymond-Yakoubian and Raymond-Yakoubian 2017, Kawerak 2021). What may or may not have an impact on Tribes is a question for Tribes to answer. In addition to assisting in properly addressing the potential impacts of research on Tribes, this would also assist in the implementation aspect of the proposed Tribal review and approval policy (the implementation aspect is, in general, lacking in detail as the proposed revisions currently stand). NSF recognizing a broad and Tribally-based interpretation of activities which require Tribal Nation review and approval would also likely encourage researchers to work collaboratively with Tribes, and to do so as early as possible in the research process.	Thank you for your comments. The intent of this provision is to ensure Tribal Nation interests and resources are respected and to encourage early engagement and meaningful collaboration with the Tribal Nation(s). Regarding your concern about which resources and interests are covered by this provision, NSF has determined that when the PAPPG is officially implemented, its application will be initially limited to Tribal lands or those aspects of Tribal life that are within the domain of the Tribal Nation (as opposed to individual Tribal members), including but not limited to Tribal languages and subsistence rights on Tribal Nation lands. In addition, Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources. Such processes could include the establishment of Tribal Nation's terms and conditions about data ownership and other relevant research activities when reviewing and approving requests for permission and/or the assessment of fees to cover the cost of reviewing requests for permission.
120	Kawerak, Inc; Aleut Community of St. Paul; Association of Village Council Presidents; Bering Sea Elders Group	Tribal Nations	II.E.10	II-43	While supportive of the important effort to consider the impacts to Tribes as pertains to research, we also encourage all research institutions—including NSF—to conceive of the relationship between Tribes and research broadly, beyond just a focus on impacts; rather, we stress the need to focus on an indigenization of research, an understanding that Tribes are part of what research fundamentally is (Raymond-Yakoubian and Raymond-Yakoubian 2017, Kawerak 2021). Among other things, such a consideration broadens the suite of requisite epistemic and ethical considerations for research, such as greater movement towards co-production of knowledge. One small way this broader understanding could be realized in the PAPPG revisions would be to include some examples of activities which could be considered as a researcher's "Synergistic Activities" (see Chapter 2 Section D(2)(h)(iv)) that are not traditionally western in nature, such as serving on a co-management body or expertly sharing Traditional Knowledge across generations and/or cultural groups.	Thank you for your comments. The intent of this provision is to ensure Tribal Nation interests and resources are respected and to encourage early engagement and meaningful collaboration with the Tribal Nation(s). In addition, Tribal Nations, as sovereign entities, have the authority to determine the process for reviewing requests for permission to conduct research that may impact their interests or resources.
121	Kawerak, Inc; Aleut Community of St. Paul; Association of Village Council Presidents; Bering Sea Elders Group	Tribal Nations	II.E.10	II-43	It is our understanding that information about these revisions and the associated request for comments were sent to Tribal leaders. Having had a chance to review email correspondence that was sent to this effect, we encourage NSF to also include in such correspondence an invitation to Tribes to engage in formal Tribal Consultation on these and other issues. Providing comment is something anyone in the public can do; Tribes have special status, rights and relationships which must be recognized and affirmed in processes such as this. The Tribal entities signing on to this letter also wrote to NSF in 2020 and 2021 with regard to significant concerns and problems associated with NSF research processes (Kawerak et al. 2020, 2021). We do not feel that there has been adequate progress or engagement with Tribal entities regarding those issues. We do see these proposed revisions to the PAPPG as a positive step towards improving the nexus related to Tribes and research. As such, we encourage continued work along such paths, including in a more substantial way and with greater involvement of Tribal entities.	Thank you for your comments. In response to your concern about the level of consultation that took place prior to developing the proposed language, NSF acknowledges that while a formal consultation with each of the 574 Tribal Nations was not practical, we engaged in extensive efforts to obtain feedback from Tribal Nations regarding how to enhance research practices and policies. The proposed PAPPG provision was drafted in response to what we heard during an April 2021 Director's Town Hall to which all federally-recognized Tribal Nations were invited, a 90 day public comment period that commenced shortly before the 2021 Town Hall, a series of listening sessions that occurred during the summer of 2022, and outreach efforts of NSF's Tribal Consultation and Engagement Working Group (which included attending conferences focused on the interests of Tribal Nations). This proposed language was then drafted and public comments were solicited between mid-April of 2023 and June 12, 2023. To ensure that federally-recognized Tribal Nations were aware of this proposed language, NSF sent out both emails and post cards to Tribal Nation leaders notifying them of this proposed language. In addition, NSF held "office hours" to answer questions about the proposed language.

Number	Comment Source	Topic	PAPPG Reference(s)	PAPPG Page Numbers	Comment	NSF Response/Resolution
1	DACS	Foreward	Introduction B	x	Revise the paragraph to state: "The PAPPG does not apply to NSF procurement contracts, other arrangements, or other transactions."	This update has been incorporated.
2	DACS	NSF Organizations	Introduction E.5	xx	<p>Revise to state:</p> <p>DACS awards procurement contracts, other arrangements, other transactions, grants, and cooperative agreements in support of the Foundation. The contracts branches are responsible for the planning, solicitation, negotiation, award, and administration of professional, research and development, and support contracts and some financial assistance awards for NSF. The Infrastructure Support Branch (ISB) is responsible for planning, solicitation, negotiation, award, and administration of cooperative agreements primarily focused on research infrastructure including Federally Funded Research and Development Centers (FFRDCs) and multi-organizational and international programs, in all life-cycle stages and certain other awards requiring significant post award oversight.</p> <p>DACS participates in NSF's Integrated Project Teams, business process reviews, risk assessments, advanced cost analysis, oversight, and administrative assistance. The DACS Grants & Agreements Officers and Contracting Officers have delegated warrant authority to issue awards on behalf of the Foundation and their approval constitutes a legal obligation of Federal funds for recipients to expend to fulfill the scope of the approved proposal. In addition, DACS Awarding Officials are responsible for issuing all award amendments and certain postaward prior approvals, for monitoring recipient compliance with award terms and conditions, and for the administration and closeout of these awards.</p> <p>The DACS Policy Branch provides comprehensive compliance oversight and operational policies to support the DACS mission as well as maintaining NSF's FAR-based acquisition framework and other arrangement/other transactions guidance.</p>	
3	DACS	Broad Agency Announcements (BAAs)	I.C.4	I-2	With the exception of RIE's use of a BAA, BAAs will not result in the award of financial assistance instruments. As such, DACS suggests removing BAAs since they are subject to the FAR and DACS FAR-supplements, not the PAPPG. DACS is issuing guidance on BAAs limiting possible awards to non-financial assistance instruments.	This update has been incorporated.
4	DACS	FFRDCs	I.E.2.d	I-7	FFRDCs are prohibited from competing against non-FFRDCs. The ability of a FFRDC to compete for awards should be clearly explained an award made to establish a FFRDC. DACS is updating the NSFAR to be as explicit as other supplements, like DOE. See FAR 35.017-1(c)(4)	
5	DACS	Property Management Standards	IX.E	IX-5	Suggest this to be rewritten to say, "where NSF awards involves real property. Add the footnote to state, "2CFR 200.311".	
6	DACS	Patents and Inventions	XI.D.1.m(v)	XI-16	m: Request for conveyance of title to NSF: Should the General Counsel be mentioned here, given that they would litigate any case on the behalf of NSF?	
7	DACS	Patents and Inventions	XI.D.1.n	XI-16	<p>n: Appeals: In this section, a few notes</p> <p>1.) Consider removing any reference to the General Counsel as a decision maker.</p> <p>2.) Should the appeal also be inclusive of DGA too and not only DACS.</p> <p>3.) Who is the "NSF Deputy Director"? While the COO fulfills many of the roles, it should be definitive.</p>	
8	DACS	Informal Resolution of Award Administration Disputes	XII.B.3.a	XII-3	Procedures: Remove "both" in the first sentence. Should be addressed to the DD for the cognizant G/AO.	
9	DACS	Informal Resolution of Award Administration Disputes	XII.B.3.b	XII-3	<p>Procedures: "Remove Division Director, DACS"</p> <p>Also, should the recipient use email instead of snail mail? Create an email alias for these to be sent to. We should ensure that this is no where else in the document that request recipients to mail something to the NSF building.</p>	
10	DACS	Informal Resolution of Award Administration Disputes	XII.B.3.b	XII-3	Remove "DACs" in the first sentence of section. b.	
11	GEO	Seeking and Obtaining Tribal Nation Permission for Proposals that May Impact Tribal Resources or Interests	II.E.10	II-43	<p>Arctic Sciences Section POs write to express strong support for the intent of the proposed PAPPG language, which we understand is intended to promote and enhance relations between Tribes and federal agencies. However, the Section has concerns about the lack of definition and broad sweep of these new requirements, which we anticipate will cause confusion among Pis, NSF POs, and, perhaps most significantly, among Tribal officials and citizens. See the full text of the comment here: https://nsf-my.sharepoint.com/:g/personal/0563736995_nsf_gov/EVtqJfUzldlOi8qHhG_SUJoBNkcs5JN8G6aRRZd73qQCA?e=1lu0PL</p>	