

Guidance on Financial Assistance (GFA) 60-Day Comment and Response- DRAFT

NSF Public Comment Review and Revision Process

NSF provided a 60-day public comment period on the draft Guidance on Financial Assistance (GFA) and received more than 3,200 comments. The comments reflected substantial engagement with both the overall structure of the GFA and individual policy provisions. NSF reviewed the comments and consolidated substantially similar comments into significant issues and recurring themes rather than addressing duplicative comments individually.

NSF evaluated comments to identify opportunities to improve the clarity, usability, consistency, and implementation of the GFA; ensure alignment with governing statutes, regulations, and government-wide policy; address potential administrative burden or ambiguity; and consider recommendations to retain, restore, or modify NSF policies and procedures. Related issues appearing across multiple guides were reviewed together to promote consistent treatment throughout the GFA. The list of comments received by the public can be found on [Regulations.gov](https://www.regulations.gov).

The table below summarizes those comments received during the 60-day comment period and NSF's responses.

Topic	Summary of Comments	NSF Response	Guide
Single Consolidated PDF	Comments requested a single PDF version in addition to the topic-based guides so that institutions can search, download, distribute, and preserve the GFA as a complete document.	NSF will make a single consolidated PDF version of the GFA available in addition to the individual topic-based guides available online.	Introduction
Implementation Period	Comments requested sufficient time between publication and implementation to update institutional policies, systems, training materials, and compliance processes.	NSF will allow sufficient time between publication and implementation of the GFA before it takes effect to ensure that proposers and recipients have sufficient time to implement process and system enhancements.	Guide 1

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Complete Version History and Archiving	Comments requested clear version dates and preservation of historical versions so recipients can determine what requirements applied at a particular point in time.	NSF will identify the applicable date of each guide and maintain archived versions of the GFA. This will allow recipients and other users to identify the requirements in effect for a particular version and period. NSF also will continue to maintain access to historical PAPPG materials.	Introduction
Burden Estimates	Comments questioned whether a single estimate of approximately 120 hours per proposal adequately reflects substantial differences in proposal complexity, organization type, and NSF program requirements. Comments recommended estimates that better reflect the range of proposal types.	NSF reviewed its burden methodology and revised its estimates to better reflect differences in proposal complexity rather than relying on a single estimate that may not represent the range of NSF proposals.	Introduction
Applicability to Existing Awards	Comments requested clarification regarding whether a new version of the GFA applies only to new awards or also changes requirements governing existing awards.	NSF clarified that the GFA will apply to new awards and to existing awards when new funding is awarded, including applicable supplements and renewals. The applicable guide/version and award terms should be consulted to determine the requirements governing a particular award action.	Introduction
Use of Links to Statutes and Regulations	Comments questioned whether linked statutes or regulations become part of the GFA and what occurs if a link changes or is omitted.	NSF has revised and determined that hyperlinks better facilitate access to overarching governing statutory and regulatory authorities. Applicable statutes and regulations operate according to	Introduction

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		their own legal authority regardless of whether they are reproduced or linked in the GFA. This approach also reduces duplication and the risk that NSF guidance will restate a government-wide requirement inaccurately or become outdated.	
Proposed 2 CFR Part 200 Revisions	Comments objected to incorporating provisions from OMB's proposed revisions to 2 CFR part 200 before those revisions were finalized. Concerns focused on proposed provisions affecting publication costs, fixed-amount awards, international collaboration, conferences, termination, award administration, and other requirements. Comments recommended that NSF continue to apply the currently effective Uniform Guidance until OMB completes its rulemaking.	NSF revised the GFA to remove policy changes that were based solely on proposed revisions to 2 CFR part 200 and restored language consistent with the currently effective Uniform Guidance. This includes restoration or revision of provisions addressing fixed-amount awards and publication costs. NSF also removed the proposed requirement concerning disclosures by former NSF employees who had worked on a proposal and had been employed by NSF during the preceding two years. Conference and termination requirements link to the existing 2 CFR part 200 currently in effect. NSF will address future changes to 2 CFR part 200 after final government-wide requirements are issued and NSF determines what conforming changes are necessary.	Guides 1, 3, 4, 12, 23, 25

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Role Clarifications	Comments requested clarification of roles within NSF, including the NSF Grants Officer, NSF Program Director, and NSF Leadership Official, as well as clarification of the role of the Principal Investigator.	NSF addressed this comment by incorporating additional information on each position and clarifying the role of the NSF Leadership Official (formerly the division director) to include an expanded set of leaders who supervise NSF Program Directors and can commit program funds before proposals are sent to the NSF Grants Officer for review and award.	Guide 1
Major Research Equipment and Facilities Construction Reference	Comments noted that NSF should retain references to the Major Research Equipment and Facilities Construction (MREFC) account or otherwise clearly identify the applicable award mechanism for MREFC-supported activities.	NSF did not restore references to MREFC and removed this language because MREFC and research facility information is contained in the NSF Research Infrastructure Guide (RIG). NSF has provided links and references to that guide in the GFA.	Guide 1
Natural or Human-Caused Events	Comments requested a correction to the procedure and upload process and requested more than five business days past the deadline to allow sufficient time for the proposing organization.	NSF corrected the reference in the procedure but is not extending the five-day period. Given that many of NSF's funding opportunities have moved to a "no deadline" model, NSF believes there is sufficient flexibility for proposers.	Guide 2
NSF Closure	A comment requested that NSF add a procedure for contacting the NSF Program Director to obtain written approval for late submissions when NSF is closed.	NSF reviewed the comment and decided not to add another step addressing NSF closures. NSF will issue separate guidance and post additional information on its website if the agency is closed, for	Guide 2

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		example, as a result of a lapse in appropriations.	
Annual NSF Account Recertification	Comments requested clearer instructions regarding who must recertify NSF accounts, what must be reviewed, and when annual recertification must occur.	NSF clarified that annual account review and recertification is an information-security practice intended to help ensure that institutional account information and access remain accurate. Institutions may conduct the annual review in accordance with their internal schedules, provided that account information is reviewed annually.	Guide 2
Eligibility of For-Profit Organizations	Comments requested explicit recognition of for-profit organizations, noting that ambiguity could discourage participation in commercialization, translational research, and public-private partnerships.	NSF reviewed the eligibility language to make it clearer that for-profit organizations may be eligible where authorized under NSF's general eligibility framework and the applicable funding opportunity. Individual funding opportunities may establish narrower eligibility based on statutory authority or program objectives.	Guide 2
Concept Outlines	Comments recommended that Concept Outlines be submitted through Research.gov so that proposers and NSF have an electronic record of submission and disposition.	NSF is currently evaluating system capabilities to route Concept Outlines through Research.gov. Proposers should continue to email Concept Outlines to Program Directors for review and	Guide 2

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		approval prior to submission if required by the funding opportunity.	
Proposal Accessibility	Comments requested standards to follow when submitting alternative text and machine-readable documents.	NSF reviewed and did not establish a single standard in the guidance because multiple accessibility standards are available to the community and did not want to restrict.	Guide 3
Current and Pending Support and Biographical Sketches	Comments requested clarification regarding current and pending support disclosures, biographical sketches, and notification of institutional certifications for current and pending support.	NSF revised the definitions for current and pending support and biographical sketches to better align with federal definitions.	Guide 3
Institutional Certifications	Comments argued that certain proposed certifications could require AORs to attest to facts concerning investigators that institutions cannot reasonably know or independently verify, thereby expanding institutional responsibility beyond matters within their control.	NSF revised and clarified the certification requirements to focus AOR certifications on matters within institutional knowledge and control. Where appropriate, the institution certifies that investigators have been informed of applicable requirements rather than independently attesting to information that only the PI knows.	Guide 3
Salary Rebudgeting and Changes in Person-Months	Comments expressed concern that the draft appeared to remove recipient flexibility to change senior/key personnel effort after award and could convert routine recipient-managed	NSF clarified recipient authority to approve changes in person-months after award where NSF prior approval is not otherwise required. NSF prior approval continues to apply when established	Guide 4

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	changes into NSF prior-approval actions.	prior-approval thresholds are met, including a reduction of 25 percent or more in the time devoted to the project by the PI or co-PI. This preserves recipient flexibility for routine adjustments while retaining NSF oversight of material changes affecting project execution.	
Voluntary Committed Cost Sharing	Comments requested restoration of NSF's prior policy language governing voluntary committed cost sharing and clarification of when institutional contributions may be included in proposals.	NSF added language addressing voluntary cost sharing to ensure compliance with existing 2 CFR part 200 requirements and National Science Board policy.	Guide 4
Indirect Cost Rates	Comments requested clarification regarding which entities may negotiate indirect cost rates, application of negotiated rates, the de minimis rate, and language suggesting that indirect-cost recovery could depend on the availability of NSF funds. Some comments interpreted the 15-percent de minimis rate as an NSF-wide cap.	NSF clarified the provisions addressing indirect cost rate negotiation and application and removed language suggesting that indirect-cost recovery is subject to the availability of funds. In addition, NSF does not establish a 15-percent cap on negotiated indirect costs. The referenced de minimis rate applies to eligible recipients without a negotiated indirect cost rate in accordance with the applicable 2 CFR part 200.	Guides 4, 12
Individual Development Plans	A comment requested that NSF revert to the original Individual Development Plans (IDPs) requirement that they not be maintained in organizational records.	NSF reverted to guidance stating that IDPs are not required to be submitted to NSF.	Guide 5

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Data Management and Sharing Plans	Comments requested greater flexibility in DMSP requirements. Specific recommendations included adding a process for considering significant changes to the DMSP, recognizing that certain information may not be known at proposal submission; reconsidering the four-category limit and single-plan requirement or allowing separate plans for collaborators or subrecipients; accommodating data from different fields of science; providing guidance for valuation of in-kind computational resources; and creating a separate category for public access for publications. Comments also recommended allowing flexibility by changing “must” to “may” in several instances where information may not be known at the time of proposal submission.	NSF added clarifying language that data-management requirements should accommodate different research designs and that some information may develop after proposal submission. NSF clarified the process for consulting with the cognizant NSF Program Director when changes to the DMSP are justified. NSF retained the procedures for preparing a DMSP, and the number of categories will remain the same. NSF added clarifying language about the types of information that may be provided based on different fields of science. NSF did not incorporate language on valuation of in-kind computational resources and refers proposers to 2 CFR 200.434 for more information on these categories. NSF did not create a separate section for public-access publication requirements because the DMSP focuses on data in the proposal process, while publication requirements are maintained separately for NSF awards in Guide 21. NSF revised language to change “must” to “may” to provide flexibility to proposers given that some information may not be known at the time of submission.	Guide 5

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Tribal Approval	Comments expressed concern that requiring Tribal approval for proposals affecting Tribal interests or resources could create burdens for researchers and potentially affected Tribes. Comments noted that the approval requirement could be perceived as giving Tribes authority over NSF funding decisions.	NSF retained the approval requirement for Indian Tribes impacted by NSF-funded research. The requirement is intended to respect Tribal sovereignty and help ensure that NSF-supported research appropriately addresses Tribal interests and resources. NSF is engaging federally recognized Tribes and Tribal organizations regarding implementation, including opportunities to clarify the process and reduce unnecessary administrative burden. The requirement does not transfer NSF's authority to make funding decisions; rather, it establishes an approval requirement where proposed research affects applicable Tribal interests or resources.	Guide 6
IACUC and Animal Welfare	Comments requested clarification regarding the institutional official authorized to provide required animal-welfare or IACUC documentation and certification.	NSF clarified that applicable animal-welfare documentation or certification must be signed by an appropriately authorized institutional official.	Guides 6, 20
Dangerous Gain-of-Function Research (former Dual Use Research of Concern)	Comments noted that Executive Order 14292 contemplates review or replacement of the U.S. Government Framework for Nucleic Acid Synthesis Screening and requested that NSF avoid establishing requirements that	NSF updated the GFA, as appropriate, to reflect the revised government-wide implementing policy, U.S. Government Policy for Stopping High-Risk Life Sciences, issued on July 28, 2026. The policy keeps the existing suspension of	Guides 6, 14, 20

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	may conflict with forthcoming government-wide guidance.	federally funded dangerous gain-of-function work in place.	
Broader Impacts	Comments expressed that NSF should continue to ensure greater participation from all segments of the research community. Some requested restoration of prior terminology.	NSF reviewed the GFA to ensure that eligibility, proposal, merit-review, and award-administration requirements are stated consistently with applicable law, executive orders, and Administration policy. NSF will administer funding opportunities according to their published eligibility and review criteria and applicable legal requirements. NSF continues to support broader impacts as one of its merit review criteria.	Guide 8
Merit Review	Comments emphasized the importance of expert peer review and expressed concern that changes to the GFA could introduce considerations unrelated to scientific and technical merit into proposal review or award decisions.	NSF reiterates that it will continue to follow its established merit-review process, with NSF Program Directors considering the results of merit review and other applicable programmatic considerations when making recommendations and decisions consistent with NSF policy and the applicable funding opportunity.	Guide 8
Award Actions	Comments requested that NSF revise the use of the term “accepting” to “drawing funds” to constitute acceptance and correct the reference to award budgets in the award notice list.	NSF reviewed the comment, revised the term to “drawing funds,” and revised the award conditions list.	Guide 10

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Special Creativity Extensions	Comments requested restoration of Special Creativity Extensions as a mechanism for providing additional support to particularly creative or promising projects.	NSF considered the recommendation but will retain the elimination of Special Creativity Extensions. NSF has issued relatively few such extensions and determined that existing mechanisms can address the underlying needs. A no-cost extension may provide additional time where appropriate, while supplemental funding may provide additional resources when justified. Maintaining a separate, infrequently used extension mechanism is therefore unnecessary.	Guide 11
Accomplishment-Based Renewals	Comments requested restoration of Accomplishment-Based Renewals (ABRs) as a mechanism for continuing particularly successful projects.	NSF considered the recommendation but will retain the elimination of ABRs. NSF has used the mechanism infrequently and determined that successful projects may seek continued support through NSF's standard renewal process. The standard process provides a more consistent approach to evaluating continued support without maintaining a separate, rarely used renewal mechanism.	Guide 11
Changes in Project Objectives or Scope	Comments requested that NSF clarify what constitutes a change in scope to Facilities, Equipment, and Other Resources.	NSF reviewed the comment and did not adjust this language because it reflects a current standard. If there are changes to this section, the award recipient should contact the cognizant Program Director to discuss them further.	Guide 11

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Subawards and Flow-Down Requirements	Comments requested clearer guidance regarding subrecipient determinations, risk assessments, and which Federal and NSF requirements must be flowed down to subrecipients.	NSF reviewed the provisions for consistency with the Uniform Guidance and clarified distinctions between recipients and subrecipients, where appropriate. Pass-through entities remain responsible for required subrecipient determinations, monitoring, and applicable flow-down requirements.	Guide 11
Pre-Award Costs	A comment requested that NSF include the allowability of NSF-approved pre-award costs in excess of 90 days, consistent with the policy in PAPPG 24-1.	NSF reviewed the comment and restored this language from PAPPG 24-1 to the GFA.	Guide 12
Scientific Integrity	Comments also requested a definition of scientific integrity and the addition of “inappropriate influence” to the scientific integrity definition for researchers.	NSF did not revise its scientific integrity definition to include “inappropriate influence” given that the referenced section applies to proposers, award recipients, and the research community.	Guide 13
Gold Standard Science	Comments requested additional explanation of Gold Standard Science and how NSF expects the principles to apply to NSF-supported activities.	NSF provided a link to NSF’s Gold Standard Science implementation plan allowing users to consult the authoritative and explanatory materials rather than relying on an abbreviated description in the GFA.	Guide 13
Responsible Conduct of Research	Comments generally supported responsible-conduct requirements but requested clearer definitions and	NSF reviewed the Responsible Conduct of Research provisions for clarity and consistency with applicable requirements but did not expand the definition.	Guide 13

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	practical guidance concerning research security.		
Research Security — Definitions and Terminology	Comments requested clearer and more consistent definitions for research-security terms, including Foreign Country of Concern, honorary appointments, Faculty Associate or equivalent positions, International Research of Concern, and “other research security violations.” Comments noted that abbreviated definitions could conflict with statutory or government-wide definitions.	NSF revised research-security terminology to rely more directly on applicable statutory and federal definitions. In particular, NSF reconciled terminology concerning Foreign Countries of Concern, directs users to the applicable Federal source for current information, and removed “other” before “research security violations.” NSF retains the definition of Faculty Associate from PAPPG 24-1. The definition of International Life Sciences Research of Concern has been aligned with the government-wide implementing policy U.S. Government Policy for Stopping High-Risk Life Sciences, issued on July 28, 2026. NSF clarifies that all research security violations identified by the organization must be provided to NSF within 30 calendar days of identification.	Guide 14
Research Security — TRUST Framework and Risk Assessments	Comments requested additional transparency regarding the TRUST Framework, including how NSF identifies research-security risks, the analytical tools and screening lists used, whether institutions will receive risk-assessment findings and an	NSF recognizes the requests for greater clarity concerning implementation of the Trusted Research Using Safeguards and Transparency (TRUST) Framework and research-security risk assessments. NSF uses the TRUST pilot to assess research security risks associated with NSF	Guide 14

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	opportunity to respond, and whether requirements apply to activities such as specimen loans or fieldwork in countries of concern. Some comments argued that screening against numerous Federal lists would create substantial institutional burden.	proposals and awards. TRUST provides a risk-based process for identifying and mitigating potential research security concerns, including those related to appointments, positions, sources of research support, and compliance with disclosure requirements. TRUST assessments are conducted separately from NSF's merit review process. NSF did not provide additional details on the TRUST Framework but did provide easier access to the lists for review.	
Property Management	Comments requested clarification of title, use, management, inventory, disposition, and reporting requirements for property acquired with NSF assistance. Some specifically objected to including biological specimens, core samples, and other physical research products within the definition of tangible personal property and to removing definitions for tangible personal property and recipient-titled property, and requested restoration of provisions describing recipients' legal rights.	NSF clarified the definitions for title and use of equipment, equipment disposition, and Federal Property Standards. NSF removed the examples of biological specimens, core samples, and other physical research products from the definition of tangible personal property. NSF maintained the definitions for tangible personal property and recipient-titled property because they are referenced in Guide 21. NSF restored language addressing the recipient's legal rights under an award.	Guide 15
Financial Management and Payments	Comments requested clarification regarding advance payment authority, reimbursement, working-capital	NSF revised the financial-management provisions to clarify advance authority, working-capital advances, payment	Guide 16

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	advances, withholding of payments, interest on Federal advances, cancelling appropriations, and remittance requirements. Comments also requested that the GFA refer to the Payment Management Service site for contact information rather than including specific routing numbers in the GFA.	withholding, and requirements concerning remittance of interest earned on Federal advances. NSF also clarified relevant terminology to support more consistent administration. NSF removed the routing numbers for payments and referred to the Payment Management Service site.	
Overdue Project Reports	Comments requested clarification that a report should not become overdue merely because an NSF Program Director has not yet approved a report that the recipient submitted by the required deadline.	NSF clarified that the recipient's timeliness obligation is based on submission of the required report, rather than subsequent approval by the NSF Program Director. This distinguishes the recipient's reporting responsibility from NSF's internal review and approval process.	Guide 18
Title VI of the Civil Rights Act, Section 504, Title IX, and Age Discrimination Evaluations	Comments requested that NSF not rescind regulations concerning compliance with Title VI of the Civil Rights Act and not remove references and requirements for Section 504 coordinators, Title IX coordinators, and age discrimination evaluations.	NSF confirms that the GFA has no effect on the referenced statutes or regulations and in no way “rescinds” them. NSF has determined that the agencies responsible for issuing these regulations provide notice regarding them. The absence of references to them in the GFA does not diminish the authority of the agencies that administer them.	Guide 19

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Harassment and Nondiscrimination	Comments requested clarification regarding nondiscrimination and harassment requirements, organizational and individual reporting responsibilities, and applicable institutional officials.	NSF added information addressing Safe and Harassment-Free Working Environments and Sexual Assault and Harassment Prevention and Response.	Guide 19
Intellectual Property	Comments requested alignment with applicable Bayh-Dole requirements, restoration of the 30-day review period for unwanted inventions, and clearer terminology and regulatory references concerning march-in rights.	NSF clarified that NSF implements the Bayh-Dole Act and its implementing regulations for covered funding agreements and subject inventions and restored the 30-day review period for unwanted inventions. NSF also revised the special-patent-provisions discussion to clarify that restrictions on a recipient's right to retain title require an agency determination consistent with applicable statutory and regulatory procedures and are not made solely by an individual Grants Officer. NSF also revised the discussion of march-in rights to align with the statutory criteria.	Guide 21
Copyright	Comments requested clarification of NSF's rights in copyrighted materials and how those rights apply to materials developed under NSF awards.	NSF clarified the copyright provisions concerning the rights NSF obtains in materials developed with NSF support and the circumstances in which those rights apply.	Guide 21
Data Management and Sharing Plans	Comments recommended separating data and research-product sharing requirements from copyright	NSF has separated data sharing and copyright provisions to improve clarity.	Guide 21

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	provisions. They also requested more precise persistent-identifier requirements, including that dataset identifiers resolve to the landing page for the particular dataset rather than the repository generally.	NSF has also clarified that the PID should resolve to the landing page.	
Public Access Repository	Comments sought confirmation that publisher or public access fees associated with complying with NSF's Public Access Repository requirements are allowable, noting that such costs may be necessary to meet NSF's public access requirements.	NSF reviewed the comment and notes that deposits of AAMs into PAR fulfill NSF public-access requirements for publications and do not require payment of special fees to publishers or other third parties. Special fees for the purpose of making published versions of record (VORs) publicly accessible are allowable costs, but such payments are not required for deposits of AAMs in PAR. NSF did not adopt revisions to include costs in the AAMs section because paying author fees is not a prerequisite to sharing AAMs via PAR.	Guide 21
National Security	A comment requested that NSF add additional information related to National Security Decision Directive 189.	NSF reviewed the comment and decided not to incorporate additional requirements from NSDD 189 because the GFA provides an overview of the requirements. Additional information regarding national security and controlled unclassified information (CUI) should be directed to the cognizant NSF Program Director.	Guide 24

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Research Misconduct	Comments requested exceptions or safe harbors, clarification regarding plagiarism involving Super Intelligence tools, information regarding NSF plagiarism detection, citation to the governing research-misconduct regulation, and clarification of references to research misconduct in provisions concerning suspension or termination.	NSF did not create specific exceptions or safe harbors because those issues extend beyond the scope of the GFA provision. NSF clarified that use of these tools does not remove responsibility for conduct that otherwise meets the applicable definition of research misconduct. NSF added a citation to the governing research-misconduct regulation. NSF also removed language that could imply separate research-misconduct information-handling requirements and clarified that the relevant section addresses suspensions, terminations, and disputes.	Guide 25
Suspension and Termination Grounds	Comments requested clear and predictable grounds for suspending or terminating an award and specifically objected to language allowing termination or a determination that an award no longer aligned with agency priorities.	NSF revised the GFA to rely on the grounds and procedures in the currently effective Uniform Guidance. Rather than establishing a separate NSF list that could diverge from governing regulations, the GFA links users to the applicable regulatory requirements.	Guide 25
Termination Notice and Appeals	Comments requested adequate notice when NSF terminates an award and a meaningful opportunity to appeal or otherwise contest the action.	NSF clarified the applicable termination and dispute procedures and retained an appeal pathway for applicable NSF award actions. The GFA links to the governing 2 CFR part 200 termination requirements and separately identifies NSF's procedures for disputes and appeals.	Guide 26