

# PUBLIC SUBMISSION

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Recently Posted NSF Rules and Notices.

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Agency Information Collection Activities; Proposals, Submissions, and Approvals: Proposal and Award Policies and Procedures Guide

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The new Biosketch and current and pending formats are exceptionally cumbersome and result in a significantly increased administrative burden on research administrators.

There needs to be a procedure in place to more easily identify the source of biosketches created with sciencv to ensure compliance. Research administrators collecting bios from many faculty, sometimes across multiple institutions for collaborative proposals need an easy, quick way to determine the source fo the documents to ensure that they are compliant. There needs to be more flexibility in the fillable PDFs for space between categories. There needs to be a better way to eliminate compliance issues when completing the fillable PDFs with a web browser.

The current and pending procedures are extremely burdensome for large proposals. NSF should move to a JUST in TIME procedure for current and pending, similar to NIH. The current procedure is a massive administrative burden, especially for the large proportion of proposals that are not funded and this burden is exponentially increased with the new formatting requirements. At a minimum, NSF should drop the requirement to include the proposal currently being submitted on current and pending forms. Title and especially budget are often not finalized until late in the proposal preparation process. This results in undue administrative burden to update this information on current and pending forms. This problem is complicated further when faculty use sciencv to generate current and pending and research administrators can not easily update the information. This is especially burdensome for large proposals with many researchers, and even more so for collaborative proposals that include faculty from multiple institutions.

The administrative burden for these new formats is real, and excessive, and not fully understood by NSF policy makers. I'd encourage you to engage more with research administrators prior to making these types of changes to more fully evaluate the impact.