

# PUBLIC SUBMISSION

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**Docket:** NSF\_FRDOC\_0001

Recently Posted NSF Rules and Notices.

**Comment On:** NSF\_FRDOC\_0001-2604

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

**Document:** NSF\_FRDOC\_0001-DRAFT-0487

Comment on FR Doc # 2020-27448

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## Submitter Information

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## General Comment

Request clarification in wording regarding "Proposals Involving Vertebrate Animals." Specifically, para. 4.e.(ii) and 4.e.(iii). Not all schools have a PHS Approved Animal Welfare Assurance Number as required by the language. This is because neither NSF or PHS issue numbers to schools without animal welfare funding. Once funded, the school can request from NSF to petition PHS for an Animal Welfare Assurance Number. The current language mandates something that is unattainable for schools entering the field of vertebrate animal studies.

Recommendation to insert language that clearly allows non-PHS Approved Animal Welfare Assurance schools to add Pending to the appropriate blanks. When funded, the school can then work with NSF to acquire the appropriate approvals to obtain an official PHS assurance. This will also reduce confusion with research admin offices, investigators and reviewers that the current language creates. Specifically, language requires a PHS assurance prior to submission. This is unattainable as NSF will not coordinate an assurance without a funded project. Schools are then placed into a catch twenty-two situation - can't submit a proposal because the schools does not have an assurance but unable to get an assurance because your school has no animal studies.

Thank you for your support and understanding with this request. Please feel free to contact me for further clarification.