



February 11, 2021

Suzanne H. Plimpton, Reports Clearance Officer  
National Science Foundation  
2415 Eisenhower Avenue, Suite W18200  
Alexandria, VA 22314  
*Sent via email to:* [splimpto@nsf.gov](mailto:splimpto@nsf.gov)

Subject: National Science Foundation Proposal/Award Information—NSF Proposal and Award Policies and Procedures Guide (Draft NSF 22-1)  
[85 FR 80823](#)

Dear Ms. Plimpton:

The University of Wisconsin-Madison (UW-Madison) is a member institution of the Council on Governmental Relations (COGR) and endorses the COGR letter. In addition, we would like to offer the following comments on the NSF Proposal and Award Policies and Procedures Guide (PAPPG).

Categories of Proposers, page I-6; Cover Sheet, page II-10; International Activities, page II-34  
Each of the sections in the heading above makes reference to Foreign Organizations.

- In Categories of Proposers, the part on Foreign Organizations states, “In cases however, where the proposer considers the foreign organization or individual’s involvement to be essential to the project and proposes to provide funding to the foreign counterpart through the NSF budget (through a subaward, consultant arrangement, or other direct funding)...”
- In Cover Sheet, the bullet on Funding of a Foreign Organization states, “including through use of a subaward, consultant arrangement or other direct funding.”
- In International Activities, the instructions describe a check box for “Funding of a Foreign Organization, including through use of a subaward or consultant agreement.”

The first two instances include the wording “other direct funding”, while the third instance does not. We wanted to draw attention to this inconsistency in wording and ask for further information. Please elaborate on the meaning of “other direct funding.” Does "other direct funding" include planned

purchases from foreign vendors? Does “other direct funding” include situations in which a proposing organization intends to employ a foreign national working in a foreign country? We are seeking additional clarification to understand when we are obligated to indicate involvement of a foreign organization or individual.

#### Biographical Sketch, page II-14

Thank you for replicating the language from the NSF website about outside professional appointments in the PAPPG. Doing so provides clarity for our researchers in the primary source of information for proposal preparation. We are also appreciative that NSF has included the option to use “et al.” in the product citation information in lieu of listing all authors’ names. This guidance will help our researchers stay compliant with the two-page biosketch limit.

#### Current and Pending Support, page II-24

We wanted to emphasize our support for COGR’s suggestions for the Current and Pending Support section of the PAPPG. We believe that additional language will help clarify to our researchers what activities need to be included in Current and Pending Support documents. An alternative to incorporating the suggested language in the second sentence of part (ii) of this section would be to adopt the definition of “current and pending research support” in the [National Defense Authorization Act for FY 2021](#), Sec. 223, which is:

The term “current and pending research support”--

(A) means all resources made available, or expected to be made available, to an individual in support of the individual's research and development efforts, regardless of--

(i) whether the source of the resource is foreign or domestic;

(ii) whether the resource is made available through the entity applying for a research and development award or directly to the individual; or

(iii) whether the resource has monetary value; and

(B) includes in-kind contributions requiring a commitment of time and directly supporting the individual's research and development efforts, such as the provision of office or laboratory space, equipment, supplies, employees, or students.

We also consider it important to incorporate language from the Current and Pending Support FAQs on the NSF website in the PAPPG to ensure that it is included in the primary source of information for proposal preparation.

#### Career-Life Balance Supplemental Funding Requests, pages II-42-II-43

We would like to express our thanks to NSF for including the Career-Life Balance Supplemental Funding Request instructions in the PAPPG, thereby moving it to the primary source of information for proposal preparation.

On page II-43, we suggest that the two paragraphs immediately preceding part d (which begin, "For all eligible categories noted above, the supplemental funding...") might flow better if included in part d. The two paragraphs do not specifically apply to part c, even though that is where they are located. NSF could also consider adding a clarifying phrase, for instance, "For all eligible categories noted above, **in parts a-c**, the supplemental funding..."

#### Travel Proposal, page II-49

We concur with COGR's suggestion that the certification language be amended or be inserted as a term and condition. Given that proposals are sometimes submitted shortly before the proposal deadline, there may not be sufficient time to affirm prior to proposal submission that a meeting organizer has a written policy or code-of-conduct as described.

#### Non-Discrimination Statutes and Regulations, page XI-1

Paragraph A.1.b reads:

When NSF receives a complaint alleging discrimination under any of these statutes, NSF may refer the complaint to the grantee or another entity with authority or jurisdiction to investigate the complaint when the complaint does not meet NSF requirements for acceptance for investigation. In this instance, the grantee shall acknowledge receipt of the complaint referred by NSF to the grantee and inform NSF of the final disposition of the complaint.

This paragraph may lead to confusion. First, it says that NSF may refer back to the grantee or *another entity*, but then the second sentence only refers to the grantee providing NSF with a final disposition. We suggest NSF clarify that the grantee is not responsible for providing any update if a complaint is referred to another entity. A small suggested edit is below.

When NSF receives a complaint alleging discrimination under any of these statutes, NSF may refer the complaint to the grantee or another entity with authority or jurisdiction to investigate the complaint when the complaint does not meet NSF requirements for acceptance for investigation. In this instance, **when the complaint is referred to the grantee**, the grantee shall acknowledge receipt of the complaint referred by NSF and inform NSF of the final disposition of the complaint.

Thank you for the opportunity to comment on the PAPPG. The UW-Madison is grateful to the National Science Foundation for considering feedback from the research community. Should you have any

questions about these comments, please feel free to contact me at [kmoreland@rsp.wisc.edu](mailto:kmoreland@rsp.wisc.edu) or (608) 262-3822.

Sincerely,

A handwritten signature in black ink, reading "Kim Moreland". The signature is written in a cursive style with a large, stylized "K" and "M".

Kim Moreland, Associate Vice Chancellor and  
Director, Research and Sponsored Programs