From: <u>Dylan Shell</u>

To: <u>Plimpton, Suzanne H.</u>

Subject: [EXTERNAL] - Comment on dropping NSF- fillable format forms

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Hello, I've been told that this email address will take comments regarding the plan to use SciENcv-only forms for NSF proposals before June 13th. Here's my experience.

For the last few proposals, I've used the SciENcv set-up and I find that they are actually quite convenient. However, I have submitted a couple of proposals that are collaborative and joint with a separate funding agency (see, for example:

https://www.nsf.gov/pubs/2021/nsf21035/nsf21035.jsp). There is a huge amount of documentation that we are expected to provide for non-US investigators including Bios, C&Ps, and COA forms. I had to produce those on behalf of my collaborators because the Finnish folks do not have these materials ready to go for their own agencies, and they have their own bureaucratic red tape on their side to deal with (with their own forms, and formats, letters, budgets, budget justifications). And I have to say that the NSF Fillable Format saved me. It was the only way I could produce these materials for someone else without masquerading as them: I could use their data (in their forms) and turn them into something that research.gov would accept. If you'd removed that format, we likely would not have been able to submit.

My experience with NSF proposals (submitted myself, reviewed, and in panels) over the years has been that there is a tendency toward homogenization. They seem to converge to the same, safe (and defensive) form. Little things like these forms matter a lot because they don't affect everything/everybody in the same way: in my experience most people fit the common case, but instituting a rule to force everyone to do so will hurt the outliers, the people on the tail of the distribution, and the slightly unique submissions. Those have unique or challenging constraints (like my example with the Finnish department).... and I've seen this with research.gov being stricter about some things: it got confused by how to set up someone not at the institution but for whom we needed a budget, for instance. These weird cases are probably only discovered in the system by trying to submit unusual variants. Constraints, such as forcing SciENcv, will have no real effect on the middle of the distribution (or my "normal" core program submissions), but it would be an impediment for the less conventional ones.

That's just my 2c. Thanks for reading this and for all you guys do. The NSF is (by such a huge margin) the absolute best driver of research in the nation, you all deserve heaps of recognition.

Yours, Dylan