

May 23, 2022

FR Doc. 2022-07941

**Subject: Public Comment on National Science Foundation
Proposal/Award Information-NSF Proposal and Award Policies and
Procedures Guide**



To the National Science Foundation,

The Consortium for Ocean Leadership (COL), which represents our nation's leading ocean science, research, and technology organizations from academia, industry, and the larger nonprofit sector (to include philanthropy, associations, and aquariums), appreciates the opportunity to provide input to the proposed revisions to the National Science Foundation (NSF) Proposal/Award Information-NSF Proposal and Award Policies and Procedures Guide (PAPPG).

COL has been working with the ocean – and broader natural science – community to identify and promote policies and actions that address the special problems of remote research settings in harassment prevention, target support, and incident response. The [Report of the Workshop to Promote Safety in Field Sciences](#), generated by COL and California State University Desert Studies, summarizes a range of recommendations to provide safe and inclusive field environments for people of all backgrounds and identities, including the suggestion that federal funding entities support and incentivize Principal Investigators to ensure safe and inclusive field environments by making a safety plan a mandatory, reviewed component of proposals (recommendations 2.2 and 3.1 in the report linked above). So, COL applauds NSF for the proposed revision to its Proposal and Award Policies and Procedures Guide to include the requirement, for proposals supporting field work, for a Plan for Safe and Inclusive Field/Vessel/Aircraft Research (PSI-FVAR) as described in Chapter II.C.2.i(ix).

The proposed background and preparation sections of the PSI-FVAR, as outlined in the draft PAPPG, are clear and adhere to best practice recommendations. Completing this PSI-FVAR for proposal submission will ensure Principal Investigators clearly understand the unique circumstances of their proposed field environment, the field participants, and the required policies, processes, and training, for handling incidents in the field. We offer below a few suggestions to improve the PSI-FVAR requirement.

First, the guidance calls for Principal Investigators to provide detail regarding the multiple organizations that will be involved in the project. These may not be specifically known at time of proposal. For example, within ocean science, projects using small fishing vessels, as opposed to vessels in the academic fleet, will require some flexibility in this regard. However, the Principal Investigator should include a strategy for how multi-institutional challenges will be handled, for example, how agreement on safety plans and processes will be reached in advance of field work and how to bring partners to the highest level of safety and inclusivity. A plan is only as good as the institution with the most lenient policies.

The need for accountability could be stronger in the proposed outline. In PSI-FVAR section 2, Principal Investigators should identify those accountable for properly handling and reporting incidents in the field and for ensuring consequences for any individual found to have engaged in misconduct or unethical or disrespectful behavior per NSF's stated expectations. Will Principal Investigators be required to report on their success or lessons learned in funded project reports? How will NSF hold Principal Investigators (and others) accountable for following the PSI-FVAR? If these field safety and inclusivity plans are to be taken seriously, it will be critical that projects demonstrate adherence to their PSI-FVAR in the first annual progress report.

Finally, we would ask if each of the NSF Directorates and Divisions that fund field research have developed their review criteria for these PSI-FVAR. These will be new to reviewers, and, thus, they will need resources for evaluating that a plan has been well thought out. The above referenced [report](#) includes a pre-expedition checklist focused on safety that can serve as a guide for both Principal Investigators and reviewers in developing and evaluating the PSI-FVAR. A version of this checklist, tailored for ocean (vessel-based) science is in development, which will be peer-reviewed and published on a timeline that aligns with the effective date of the revised PAPPG.

While these questions and suggestions are important and will strengthen the proposed collection of information, overall, the PSI-FVAR is an excellent step forward for NSF and the science community. We believe that the agency's estimate of the additional paperwork's burden is accurate, and moreover, we wish to reiterate the positive impacts that mandated safety plans will have.

Thank you for the opportunity to provide input to the draft PAPPG revisions. Again, we commend the NSF on the important addition of the PSI-FVAR requirement in proposals for field research.

Respectfully,



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Consortium for Ocean Leadership Members

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