



June 13, 2022

Suzanne H. Plimpton, Reports Clearance Officer
National Science Foundation
2415 Eisenhower Avenue
Suite E7400
Alexandria, Virginia 22314

Sent via email to splimpto@nsf.gov.

Subject: Comment Request: National Science Foundation Proposal/Award; Information—NSF Proposal and Award Policies and Procedures Guide (PAPPG) (NSF 23-1)

Dear Ms. Plimpton:

The Council on Governmental Relations (COGR) is an association of 200 public and private U.S. research universities and affiliated academic medical centers and research institutes. One area of significant interest and expertise among COGR member institutions is the impact of federal regulations, policies, and practices on the performance of research conducted at our member institutions—and when appropriate, we regularly advocate for reducing the administrative burden associated with federal regulation.

COGR appreciates the opportunity afforded by the National Science Foundation (NSF) to comment on the above-captioned PAPPG before it is finalized, and we have several comments.

Chapter I: Pre-Submission Information

A. NSF Proposal Preparation and Submission (page I-1)

We applaud and congratulate NSF for its implementation of Research.gov, and the upcoming retirement of Fastlane.gov, which introduced so many people to electronic proposal submission more than 20 years ago!

C. Categories of Funding Opportunities, 4. Broad Agency Announcements (BAAM) (page I-2)

We understand that NSF plans to launch a new concept outline system, ProSPCT, because the functionality for collecting concept outlines before submission of a full proposal does not currently exist in Research.gov. On the other hand, NSF also proposes introducing a new submission portal – BAAM, which appears to duplicate functions that already exist in Research.gov and Grants.gov.

Principal Investigators and research administrators must use dozens of unique federal grants management systems, which perform similar functions in different ways. This creates significant

overhead for recipient institutions to learn, train on, use and maintain multiple grants management systems. It also introduces the potential for errors.

COGR requests that NSF focus its resources and plans for new functionality in Research.gov and not duplicate functionality in BAAM. Given that BAAM appears to be aimed at helping new groups of institutions apply for funding, the research community may be able to benefit from any streamlining planned for these non-traditional recipients. Further, if concept outlines cannot be handled through Research.gov, then we urge NSF to design any new system with tight integration to Research.gov, including common navigation and look-and-feel, to reduce the learning curve by the community.

Chapter II: Proposal Preparation Instructions

D. Proposal Contents subsection 1. Single-Copy Documents d. Certification Provided by the Organization (page II-5)

Under the new requirements, institutions must certify the “accuracy and completeness of the statements contained in the proposal.” While this is not a change, there are significant new consequences related to errors in disclosing Current and Pending Support (page II-2). Under #2 of the definition of Senior Personnel (page II-62), the PAPPG states, *Faculty Associate (faculty member) (or equivalent) -- an individual other than the Principal Investigator(s) considered by the performing institution to be a member of its faculty (or equivalent) or who holds an appointment as a faculty member at another institution, and who will participate in the project being supported.*

This means that applicant organizations are responsible for certifying the accuracy of the information in Senior Personnel that are not employed by the applicant institution and where there is no way to verify the accuracy of the information.

COGR asks NSF to address this issue, and we offer some options:

- (1) Consider updating the definition of Senior Personnel, #2 to remove individuals with unpaid courtesy or collaboration appointments at the applicant institution (e.g., retired faculty, consultants, or employees of other organizations) as Senior Personnel.*
- (2) Consider updating the definition of Senior Personnel, #2 to allow institutions to rely on a commitment letter or other means rather than their own certifications for non-recipient personnel. For example, can NSF rely on a general statement that the subrecipient or consultant will comply with the PAPPG requirements as indicated in a required proposal commitment letter/or another signature process?*
- (3) Consider a new #3 addressing those un-funded collaborators as something other than Senior Personnel for purposes of disclosure/certification.*

D. Proposal Contents subsection 2. Sections of the Proposal h. Senior Personnel Documents, (i) Biographical Sketch(es) (a) Senior Personnel two (2) Appointments and Positions (page II-23)

We appreciate the revision in the section to report only “current” positions instead of “all positions,” as stated in the current policy. This is very helpful regarding both space limitations on the biosketch and harmonization with the NIH policy.

D. Proposal Contents subsection 2. Sections of the Proposal h. Senior Personnel Documents, (ii) Current and Pending Support (pages II-24 through 26)

(b) Use of SciENcv – The new requirement that applicants use SciENcv to submit their Current and Pending Support will be challenging under the proposed timeline. While the system has been available for some time, recipient institutions, especially smaller institutions, may need more time to implement new processes. Member institutions state that investigators are responsible for manually updating in SciENcv, and they will continue to have this responsibility unless and until they can develop a system solution. For example, unless an institution has the expertise and has invested the time and resources to build an interface between their grants management system and SciENcv, all federal foundation, industry, and other sponsored award information needed for Current and Pending Support must be entered and maintained manually in SciENcv. Further, internal grants are not always captured in the same grants management system as sponsored awards. Therefore, a system-to-system solution may not be available in the short term. In addition, in-kind support is relatively new and captured at institutions using various methods. It's unclear whether any system-to-system interface is possible in the short term. These factors are examples of the significant additional burden required to keep Current and Pending Support information up-to-date in SciENcv.

We must again express how challenging these new system implementations are for smaller institutions. The burden is very heavy for institutions that don't have the range and number of employees focused on research that larger institutions have. Each new federal requirement must often be implemented by the same few people, which takes resources and support away from the researchers.

In addition, this section of the draft PAPPG includes reference to the “NSF Pre-award and Post-award Disclosures Relating to the Biographical Sketch and Current and Pending Support,” which, for the last year or so, has required disclosure of “Startup company based on non organization-licensed IP” as Current and Pending Support. However, the current disclosure functions available in SciENcv support only project-based reporting and not information about the existence of a company. SciENcv itself would need to be updated to include the required information that NSF expects to receive about startup companies. Depending on the information NSF requires, it may not exist in a form and format to support a system-to-system solution and may need to be maintained manually.

We appreciate that NSF has selected ORCID IDs as a unique persistent identifier. ORCID IDs are

becoming more common and are valuable when linking an individual to publications, patents, data sets, and other research products. Still, ORCID IDs are not widely used to connect federally funded awards to a particular individual. Therefore, this will not ease the administrative burden for awards in the short term. Nonetheless, we hope broader use of ORCID IDs will enable efficiencies in the future.

COGR requests that NSF delay the requirement to use SciENcv exclusively to develop and submit Current and Pending Support for an additional 12 months to provide time for NSF to make further refinements and for recipient institutions to build efficient processes and interfaces to support Current and Pending Support disclosures through ScieENcv.

(g) Resubmission of current and pending support before award – We understand the need for NSF to assess budgetary and scientific overlap before award. However, we see this as an NSF business review and unrelated to scientific peer review of the application. This raises questions about why this information is needed at the time of proposal since the data is often stale within a few months of proposal submission.

COGR requests removing the requirement in section (b) above to submit Current and Pending Support at the time of proposal. Submission should be delayed until the project is selected for funding, as described in section (g). This change will significantly reduce the administrative burden on PIs since only about 28% of proposals are selected for funding. This approach is also consistent with the current NIH process.

D. Proposal Contents subsection 2. Sections of the Proposal i. Special Information and Supplementary Documentation (xi) Plan for Safe and Inclusive Field/Vessel/Aircraft Research (page II-29)

We appreciate the inclusion of this new section to require training and other precautions to protect the safety of researchers working in the field where there may be an increased likelihood of harassment. We agree with NSF's expectations and the responsibility of the researchers as described in sections. However, the community could benefit from some additional examples and resources related to the Preparation for Fieldwork, training, Field Incident Support, and other areas of the plan which may not already exist. Additional resources would significantly benefit smaller research institutions that wish to compete with larger research institutions for fieldwork sites.

D. Proposal Contents subsection 2. Proposal Involving Human Subjects (page II-35)

We appreciate the recognition that a sponsored award may commence well before the research team requests human participant research approvals. NSF has included several similar enhancements to policy in this version of the PAPPG, which align better with current research methods and processes. We appreciate these changes.

We thank NSF for the opportunity to provide comments on the draft NSF PAPPG (23-1). Please contact Michelle Christy at mchristy@cogr.edu should you have additional questions.

Sincerely,

A handwritten signature in blue ink that reads "Wendy D. Streit". The signature is written in a cursive style with a large, stylized 'W' and 'S'.

Wendy D. Streit
President

A handwritten signature in blue ink that reads "Wendy D. Streit". The signature is written in a cursive style with a large, stylized 'W' and 'S'.

