Comments on DRAFT 2023 PAPPG
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1.   Part I, Chapter I Section D.1: Types of Submissions; Concept Outlines:

While it appears that the concept outline tool could be useful in terms of tracking program interest in certain submissions, it is concerning that the ProSPCT tool to be utilized for submission of Concept Outlines will be separate from research.gov. This separate tool adds the burden of requiring an additional sign in via a valid and active login.gov account which many PIs do not currently have. If submission of the Concept Outline tool by either email or through research.gov were available, this new form (to be required for some types of proposals) would be less burdensome at a time when multiple new burdens are proposed to be added under the 2023 PAPPG as currently drafted. In that regard, since the NSF response to the Concept Outline will come via email, it isn't clear why submission via the login would be more helpful than simply using email but requiring a certain format for these Concept Outlines where they are requested.

In addition, it would be very disappointing if the Concept Outline discouraged direct one-on-one discussions of research ideas between potential applicants and NSF Program Officers. Such discussions are a very valuable part of the process of seeking funding and add additional transparency to the process. NSF should consider including language in the PAPPG that encourages direct communication with the program where appropriate (in the same way that many NSF Solicitations do), whether or not a Concept Outline will ultimately be required and submitted.

2.   Part I, Chapter II Section D.1.: Certification provided by Senior Personnel:

This section states in part that *"Senior personnel are required to update their Current and Pending Support disclosures prior to award, and at any subsequent time the agency determines appropriate during the term of the award"*. However, at the recent NSF Virtual Grants Conference it was stated by one of the presenters in the Policy Update Section (possibly in the Q/A function) that only updated disclosures on *current* awards were required prior to award (not updated disclosures on *pending* awards). If this statement is/was correct, can this section of the PAPPG be clarified to state exactly what updated disclosures are required when updating Current and Pending documents prior to/at the time of award? If this statement is/was not correct, can NSF review the content of the Virtual Grants Conference as posted on the NSF website to verify that any statements made by presenters at the Conference are consistent with the proposed guidance in the PAPPG?

3.   Part I, Chapter II, D. 2.(d).iii: Page Limitations and Inclusion of Uniform Resource Locators (URLs) within the Project Description:

It would be helpful if this section explicitly acknowledged that there are some types of proposals (primarily large Center or Center-type proposals) where proposals are allowed and expected to be longer than 15 pages, per the applicable Solicitation. In Fastlane Project Descriptions (PDs)

longer than 15 pages currently generate warnings, even for Solicitations where longer page lengths are allowed. Presumably research.gov will be configured to permit submissions with PDs longer than 15 pages where appropriate; it would be helpful if no warning (or error) message were generated for proposals where the Solicitation allowed the longer page limit.

4.   Part I, Chapter II, D. 2. (h) 1: Biosketches:

The NSF REU Program Solicitation requires biosketches to be modified to indicate when any co-authors on listed products are undergraduates, via an asterisk (this requirement is long standing and is contained in the newly released Solicitation NSF 22-601). There may be similar requirements in other NSF Training/Mentoring programs. Does/will SciENcv allow this type of modification? If not, the requirement will need to be removed from the REU or any similar training/mentoring Solicitations. This would be an unfortunate change, as it is very helpful to reviewers to have information about the previous experience of senior personnel publishing with undergraduate researchers and other mentees.

5.   Part I, Chapter II, D. 2. (h). ii: Current and Pending Support:

The requirement that SciENcv be used for generation of these documents is a potentially very concerning additional administrative burden. In this regard, it has been reported, and was commented on by presenters at the Proposal Submission Modernization Update and the Proposal Policy and Awards Update Sessions at the recently held NSF Virtual Grants Conferences, that there have been recent difficulties and delays experienced by the community in uploads of SciENcv CPS documents to research.gov as well as in formatting those documents. NSF should review those comments from the Virtual Grants Conference and take them into account in finalizing this section of the draft PAPPG.

The additional administrative burden of requiring submission of Biosketches and CPS documents only in SciENcv format is extremely high when combined when the additional administrative burden of requiring application submission only via research.gov (as opposed to Fastlane) beginning in January 2023. NSF should consider delaying the exclusive use of SciENcv for another year until after full implementation of application submission only in research.gov. In considering the extent of this very high burden, NSF should take into account that institutional sponsored research and administrative staff are already facing very significant workload challenges because of on-going difficulties in maintaining necessary staffing levels during the Covid pandemic. This large administrative burden could be greatly alleviated by only requiring CPS documents as part of a Just in Time request, as well as by delaying exclusive use of SciENcv for biosketches and CPS documents for one year.

6.   Part I, Chapter II, D. 2. (i). xi: Plan for Safe and Inclusive Field/Vessel/Aircraft Research (PSI-FVAR):

This section should be modified to define and clarify what is meant by 'field research' and 'fieldwork' for the purposes of this section (both terms are used in the proposed guidance, apparently interchangeably). For example, would meetings of the research team held in remote locations be included if the researchers were meeting to analyze previously collected data, but

not to collect new data? Would research training sessions held remotely/away from the home institution be included? Would research conducted virtually (such as interviews with persons outside the home institution conducted via Zoom or similar technology) be considered fieldwork?

The amount and specificity of required information to be included in this section appears to be more than could thoroughly be described in two pages, particularly for large proposals with multiple research sites and/or numerous participating institutions. NSF should consider increasing the page length, relating the page length to the number of participating institutions, or eliminating any prescribed page limits.