

NCAR Response to NSF PAPPG 23-1 Draft
June 13, 2022

1. Section D.1.e Certification Provided by Senior Personnel - GY 2021 National Defense Authorization Act (NDAA), Section 223, *"In accordance with the FY 2021, National Defense Authorization Act (NDAA), Section 223, senior personnel are required to certify in SciENcv that the information provided in their Biographical Sketch and Current and Pending Support documents are accurate, current, and complete. 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."*

Please provide clarification on the proposed process of PI Certification prior to proposal submission. We recommend outlining the process within the PAPPG guidance for clarity for all applicant parties including AOR, PI, Co-PI, administrators, etc.

- Is the certification visible on the PDF downloaded version from SciENcv?
 - Is the certification hard-coded into the document upon download and recognized upon upload into Research.gov? Thus, does an error occur in Research.gov if the certification is not valid?
 - Is it possible for PI CV/C&P certification to occur as part of the standard submission process in Research.gov/Grants.gov rather than as a separate process within SciENcv?
 - How does the certification process work when organizational delegates are assembling Senior Personnel documentation?
 - Does SciENcv allow PDF download of un-certified CV's and C&P's?
 - Is the certification required on CV and C&P documents that are copied from 'existing sources' in the platform? Will the copy feature still be available in SciENcv?
2. Section 2.h.(II) Current and Pending Support, *"Except where specifically noted as non-reportable in the NSPM-33 Implementation Guidance section on "Disclosure Requirements and Standardization," as well as Table 2a on "Guidance for disclosure of personal and professional information within R&D award application processes, current and pending support includes all resources (both foreign and domestic) made available to an individual in support of and/or related to all of the individual's research endeavors, regardless of whether or not they have monetary value, except as noted in paragraph (v) below. Current and pending support also includes **in-kind contributions (such as office/laboratory space, equipment, supplies, employees, students). In-kind contributions not intended for use on the project/proposal being proposed that have associated time commitments also must be reported."***

NCAR is a NSF Federally Funded Research and Development Center (FFRDC) sponsored by NSF within GEO/AGS. We appreciate clarification on how In-kind

contributions are reflected by FFRDC applicants like NCAR. This may or may not include office/laboratory space, equipment, co-sponsored time effort, etc.

There are occurrences when NSF base-funded PI's apply to an NSF solicitation and co-sponsor time on the proposed project. Currently, our interpretation of the PAPPG Guidance and Pre and Post Award Disclosures Table of is that an entry will be listed in the Project/Proposal section under "Current or Pending" (*not categorized under In-kind*), and the entry will be filled out in its entirety, listing the co-sponsored person months per year as that time is being committed to the project, though not necessarily funded through the proposal. The co-sponsored time effort will also be captured in the Facilities, Equipment and Other Resources Document if the effort is for the proposed project. Please confirm our understanding is correct.

3. Chapter II.C.2.i (xi) Plan for Safe and Inclusive Field/Vessel/Aircraft Research, *"Each proposal that proposes to conduct research in the field, including on vessels and aircraft, must upload, under "PSI-FVAR" in the supplementary documentation section of Research.gov, a plan that includes the elements specified below. There is a two-page limitation on the PSI-FVAR. No embedded links may be included within the twopage document. If multiple field research excursions (inclusive of multiple visits and/or sites) are proposed, only a single overarching PSI-FVAR must be submitted. If a required section within the PSI-FVAR is not applicable, the proposer should specify that the section is not applicable."*

NCAR is supportive of this additional requirement. There have been several recent project PI teams that have worked diligently to initiate and normalize this practice, including having associated studies that have demonstrated the value of bystander intervention training, in particular for field work. Would NSF consider requiring a Safety and Inclusion plan for all future field study proposals?

We expect that the plan will be submitted by the PI with each proposal in response to NSF's solicitation "Facility and Instrumentation Request Process (FIRP) 21-611" Will the facility provider, such as NCAR/EOL, also be required to provide a separate plan? Or is the plan provided by the PI sufficient for the field campaign? Or is it expected that facility providers will have a standard plan that applies to all field campaigns supported by the provider?