

**From:** [Hollingsworth, David W](#)  
**To:** [Plimpton, Suzanne H.](#)  
**Subject:** [EXTERNAL] - Comments on draft PAPPG 24-1  
**Date:** Wednesday, April 26, 2023 3:02:06 PM

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Ms. Plimpton,

Thank you for the opportunity to provide comments on the draft PAPPG 24-1

These are just minor comments for clarity and do not reflect any disagreement with the proposed changes. In fact the wording that I am commenting on is the same as was in NSF 23-1.

## Comment 1

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### Categories of Proposers

**a) Institutions of Higher Education (IHEs)** Two- and four-year IHEs (including community colleges) accredited in, and having a campus located in the U.S., acting on behalf of their faculty members. IHEs located outside the U.S. fall under **paragraph 6**, below

*I think it would be clearer if the reference was to “paragraph (c) Foreign Organizations below.”*

## Comment 2

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### E. Property Management Standards

For all other awards, such equipment is considered **“exempt property”** as outlined below and in accordance with the applicable award terms and conditions.

***Clarify is the “exempt property” referring to the definition under 200.312 Federally-owned and exempt property. If so perhaps provide that 2CFR reference and/or the definition.***

#### 2CFR 200.312

**(c)** Exempt property means property acquired under a [Federal award](#) where the [Federal awarding agency](#) has chosen to vest title to the property to the [non-Federal entity](#) without further responsibility to the Federal Government, based upon the explicit terms and conditions of the [Federal award](#). The [Federal awarding agency](#) may exercise this option when statutory authority exists. Absent statutory authority and specific terms and conditions of the [Federal award](#), title to exempt property acquired under the [Federal award](#) remains with the Federal Government.

*To me the disposition of the equipment could be more clearly stated. Is the intent that unless NSF issues disposition instruction no later than 120 days after the end of the NSF supported project for which it was required the non-federal entity has no further responsibility to the government and can dispose of it without accounting to the government? I believe this is the case but again perhaps could be made clearer.*

Thank you for the opportunity to provide these comments.

Kind Regards,

David

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