



June 2, 2023

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

Transmitted electronically via email to splimpto@nsf.gov

Dear Ms. Plimpton,

The Federation of American Societies for Experimental Biology (FASEB) appreciates the opportunity to provide feedback on the proposed updates to the National Science Foundation's (NSF's) Proposal and Award Policies and Procedures Guide (PAPPG) as posted in the [Federal Register](#) on April 13, 2023. We applaud NSF's efforts to clearly communicate proposed changes and underlying rationale for updates to this key resource for those planning to apply for NSF support.

Overall, FASEB found the proposed changes to be straightforward and necessary to reflect federal directives, namely implementation of the CHIPS and Science Act of 2022, Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations), and the National Security Presidential Memorandum 33 (NSPM-33), as well as process updates within NSF, including language to address new mechanisms to support research in undergraduate and predominantly undergraduate institutions and clarity regarding seeking and obtaining Tribal Nation permissions for proposals impacting Tribal resources and/or interests. We also appreciate the update to reflect inclusion and consideration of graduate students in addition to postdoctoral scholars in Mentoring Plans and removing Synergistic Activities as a component of the Biographical Sketch to make it a separate Senior Personnel document.

As NSF prepares to fulfill the directives within "Ensuring Free, Immediate, and Equitable Access to Federally Funded Research," issued by the White House Office of Science and Technology Policy (OSTP) to the Heads of Executive Departments and Agencies issued by in August 2022, FASEB encourages broad stakeholder engagement to ensure updates for the 2025 PAPPG clearly articulate all options available to researchers to meet the requirements of the updated NSF public access policy. Similarly, once proposed updates to NSF's public access plan are released to the

research community, we strongly encourage NSF to incorporate discussions regarding likely updates to the PAPPG to ensure alignment and clearly articulate expectations for grant applicants and awardees in this core resource.

Thank you for engaging the research community in the review of the proposed changes to the PAPPG and providing ample time for comment. The continued efforts of NSF staff to clarify and harmonize policies and procedures associated with NSF grant proposal preparation and awards management are greatly appreciated by FASEB and its constituents.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Kregel', with a stylized, flowing script.

Kevin C. Kregel, PhD
FASEB President