

# COGR

an organization of research universities

## COUNCIL ON GOVERNMENTAL RELATIONS

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Suzanne Plimpton, Reports Clearance Officer  
National Science Foundation  
4201 Wilson Blvd., Rm. 1265  
Arlington, VA 22230  
Email: [splimpto@nsf.gov](mailto:splimpto@nsf.gov)

Subject: Comment Request: National Science Foundation Proposal/Award;  
Information—NSF Proposal and Award Policies and Procedures  
Guide

Dear Ms. Plimpton:

The Council on Governmental Relations (COGR) is an association of 190 research universities and their affiliated academic medical centers and research institutes. The partnership between the National Science Foundation (NSF) and the research community has been very successful due to the strong collaborative spirit NSF brings to it. We appreciate the opportunity to offer formal comments on the draft version of the *Proposal and Award Policies and Procedures Guide* (PAPPG).

Our comments to the revised changes are noted below.

#### **Gant Proposal Guide:**

##### **Chapter 1D(2) Preliminary Proposals**

*...The PI then forwards the proposal to the appropriate office at his/her organization, and the Authorized Organizational Representative (AOR) signs and submits the preliminary proposal via use of NSF's electronic systems.*

**The existing requirements do not limit personnel to that of only the AOR in providing proposal certifications. Given the volume of proposals reviewed, we request that the current language remain.**

##### **Chapter 1G(2) Submission Instructions**

*In submission of a proposal for funding by the AOR, the AOR is required to provide certain proposal certifications. This certification process will concur concurrently with the submission of the proposal.*

**The revision of this section removes the ability to designate separate authorities to SRO's in FastLane for personnel other than the AOR to submit certain**

**certifications. Additionally, it removes the current requirement to provide the required AOR certifications within five (5) working days following e-submission of the proposal. We request that the current language remain as is which allows more flexibility to meet required deadlines and reduces the burden of the AOR and the ability to make mistakes during peak deadline times.**

Chapter II C1(d) Proposal Certifications

*The AOR must use the "Authorized Organizational Representative function" in FastLane to sign and submit the proposal, including the proposal certifications. It is the proposing organization's responsibility to assure that only properly authorized individuals sign in this capacity.*

**We request that the current language remain which makes clear that SRO's can be authorized to electronically submit the proposal after review by the AOR.**

Chapter II. C.2.f(ii) Biographical Sketch(es), Other Personnel

*A biographical sketch (limited to two pages) is required for each individual identified as senior personnel. "Other Personnel" biographical information can be uploaded along with the Biosketches for Senior Personnel in the Biosketches section of the proposal.*

**It is not clear that whether biosketches for non-senior personnel should be uploaded with the biosketches of the PI or with other senior/key personnel? Do the instructions to upload or insert individual biosketches only apply to senior/key personnel?**

Chapter II. C.2(h) Current and Pending Support

*...All project support from whatever source (e.g., Federal, State, local or foreign government agencies, public or private foundations, industrial or other commercial organization, or internal institutional resources) must be listed. The proposed project and all other projects or activities requiring a portion of time of the PI and other senior personnel must be included, even if they receive no salary support from the project(s). The total award amount for the entire award period covered (including indirect costs) must be shown as well as the number of person-months per year to be devoted to the project, regardless of source of support.*

**While we recognize that current and pending support documentation has long been a requirement of NSF and other federal agencies, requiring this documentation at proposal submission adds additional administrative burden when the likelihood of being funded is unknown. We therefore ask that only those with favorable scientific review outcomes being considered for NSF funding be asked to submit current and pending support information. Providing this information post submission or at the time that the proposal has been selected for funding also means that the information will be more current, benefitting both NSF and the institution. In addition, we recommend that the request to have internal institutional resources identified, be limited to internal funds allocated toward specific projects. This will eliminate the unnecessary burden of reporting routine new faculty start-up packages that may include general equipment and space and/or voluntary time and effort dedicated toward another project or endeavor. We are further seeking confirmation that an institution can include zero (0) person months in appropriate situations who may commit to contribute to the scientific development or execution of the project, but are not committing any specific measurable effort to the project.**

Chapter II. D.14(b). Dual Use of Research Concern (DURC)

*Proposing organizations are responsible for identifying NSF-funded life sciences proposals that could potentially be considered dual use research of concern as defined in the US Government Policy for Institutional Oversight of Life Sciences Dual Use Research of Concern.*

*If the proposing organization identifies the proposal as dual use research of concern, the associated box must be checked on the Cover Sheet. (See also AAG Chapter VI.B.5 for additional information.)*

**We are requesting clarity on the use of identifying NSF-funded life sciences that could “potentially” be considered dual use research of concern as described above vs the “identification” of DURC as implied by the second paragraph. We request that the DURC determination be consistent with the USG Policy that requires institutions to provide notification to the USG funding agency of any research that involves one or more of the 15 listed agents and one or more of the seven listed experimental effects as defined in Section 6.2 of the USG Policy within thirty (30) calendar days of the institutional review of the research for DURC potential.**

**Award Administration Guide**

Chapter VI. B.5(b) Life Sciences Dual Use Research of Concern (DURC)

*... NSF awards are not expected to result in research that falls within the scope of this Policy. If, however, in conducting the activities supported under an award, the PI is concerned that any of the research results could potentially be considered Dual Use Research of Concern under this Policy, the PI or the grantee organization should promptly notify the cognizant NSF Program Officer.*

**See comments to Chapter II. D.14(b) above.**

Chapter II. D. Technical Reporting Requirements, Paragraphs 2,3,&5 Final Project Report, Project Outcomes Report for the General Public and Grant Closeout

**Our membership has noted the difference in reporting dates between programmatic reporting (90 days) and financial reporting (120) days. We appreciate the change NSF has made in the AAG to revise the financial reporting from 90 days to 120 days but further request your consideration to reflect the same dates for programmatic reporting. This would allow institutions to reconcile charges for publications of its subrecipients while giving more time to incorporate the programmatic results into the prime recipients final programmatic report.**

Chapter VI.D.2. Public Access to Copyrighted Material

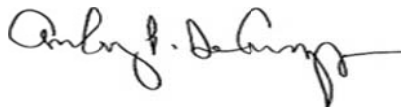
We appreciate the significant efforts the NSF has made with the release of its Public Access plan and its recognition that managing investigator research data that result from Federal investments is a major challenge. We are grateful that the NSF’s plan will be carried out in an incremental fashion allowing all stakeholder groups to collaborate on this important initiative.

While the challenges our members will face to monitor and manage various agency plans will be rough, we do appreciate NSF’s continued willingness to engage stakeholder groups and coordinate with other Federal agencies to identify infrastructure capabilities, resolve outstanding and shared concerns, and develop best practices and standards.

In closing, we also want to extend our appreciation and congratulations to the NSF on the revised changes to other areas including but not limited to proposal deadline times and formatting requirements, collaborators and other affiliations information, and project description. Any revisions that are made to address efficiency and outcomes will free up time for research faculty and administrators to strengthen and advance our nation's scientific progress.

We appreciate the opportunity to offer these comments and suggestions on the draft revision of the NSF Proposal and Award Policies and Procedures Guide and look forward to continuing our strong partnership between NSF and the research community.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony P. DeCrappeo", with a long horizontal flourish extending to the right.

Anthony P. DeCrappeo  
President