July 20, 2015

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Subject:         Federal Register/Vol. 80, No. 96/Tuesday, May 19, 2015 (p. 28713)

                 Comments on National Science Foundation Proposal/Award Information—NSF Proposal
                 and Award Policies and Procedures Guide

Dear Ms. Plimpton:

The University of Wisconsin-Madison is a member institution of the Council on Governmental Relations
(COGR) and endorses the COGR letter dated July 20, 2015.  Along with endorsing the COGR letter, we
offer our own comments in response to the draft NSF Proposal and Award Policies and Procedures
Guide.

**GPG Chapter I.F, page I-7: When to Submit Proposals and GPG Chapter II.B, page II-2: Format of the
Proposal**
We are thankful for the consistency in the use of the 5 PM submitter's local time deadline and proposal
formatting requirements.  Regardless of the solicitation or the directorate issuing the solicitation,
institutions will know what to expect and manage proposals accordingly.  Such consistency reduces
administrative burden on institutions and investigators, and we are grateful for that.

**GPG Chapter II.C.1.e, page II-5: Collaborators & Other Affiliations Information**
We welcome the separation of the information on collaborators and other affiliations.  Doing so makes
it easier to comply with the biosketch page limit.  This also allows us to be more thorough with
collaborator and other affiliation information, especially for those researchers who are very active
collaborators.

**GPG Chapter II.C.2.d(ii), page II-9: Project Description**
That the Project Description must not contain URLs and must be self-contained helps create a level
playing field in that all proposers must adhere to the same page limits.  We appreciate this clarification
and emphasis.

**GPG Chapter II.C.2.f(ii), page II-12, Biographical Sketch(es), Other Personnel**
When biosketches for non-senior personnel will be included, should they be appended to the PI or another senior/key person's biosketch?  Does the instruction to upload or insert individual biosketches only apply to senior/key personnel?

**GPG Chapter II.C.2.h, page II-19: Current and Pending Support**
1) The proposed requirement is that Current and Pending Support include project support from internal institutional resources.  We are seeking more clarity regarding this proposed requirement.  A variety of internal institutional resources may be available to support an investigator.

Internal institutional resources may be awarded for a specific research project.  In such cases, researchers have competed for resources to support a project with a specific scope of work.

Internal institutional resources may also be used to support multiple projects.  Resources may be made available in a variety of ways, for example, start-up packages or fellowships that can be used to support a faculty member's research program as a whole.  Such funding may be used at the discretion of the researchers – to purchase supplies or equipment, or to help pay for personnel.

Another possible use of internal institutional resources would be to support faculty salaries in addition to or in lieu of using a grant to pay for a faculty member's time and effort on a project.

Given the variety of ways in which internal institutional resources may be used, would NSF be able to specify what types of situations warrant inclusion on a current and pending support document?

2) We are seeking confirmation that a PI or other senior personnel can list zero person months on a project.  This may be appropriate, depending on the source of funding and the purpose of the project, e.g., an equipment grant.  That certain awards would not require effort is supported by OMB Memorandum 01-06, which states that "some types of research programs, such as programs for equipment and instrumentation, doctoral dissertations, and student augmentation, do not require committed faculty effort, paid or unpaid by the Federal Government..."

3) In lieu of requesting that the Current and Pending support information be provided at the time of proposal, NSF may wish to consider asking for it to be submitted only if an award is being contemplated, a JIT approach similar to NIH.  This approach might decrease administrative burden for the senior personnel and the proposing organization, as well as for NSF and its reviewers.

**GPG Chapter II.D.14, page II-33 and AAG Chapter VI.B.5, pages VI-5 to VI-6: Dual Use Research of Concern**
*Grant Proposal Guide* II.D.14
The language in the second paragraph of GPG Chapter II.D.14.b states that the proposing organization is responsible for identifying proposals that could "***potentially be considered*** dual use research of concern" [emphasis added].  But, the final paragraph in this section indicates that the proposing organization must check the appropriate box if it "***identifies*** the proposal as dual use research of concern" [emphasis added].

There are two issues with these paragraphs. First, the final paragraph implies (intentionally or not) that the proposing organization has already made a judgment whether or not the proposal is DURC, whereas the second paragraph does not. The two paragraphs convey different messages, but should convey the same message.

Second, the likelihood that a proposal would be identified as DURC is small because the chance that it would be put before the Institutional Review Entity (IRE) prior to submission is small. Given the administrative burden associated with the review for DURC and proposal success rates, it is possible that an investigator may notify the Institutional Review Entity of the potential of DURC only after a proposal is awarded. If an IRE does not make a determination prior to proposal submission, then the proposing organization will not be able to identify a proposal as DURC or check the box on the Cover Sheet.

We would prefer that the language in the final paragraph convey the same message as the language in the second paragraph. Another alternative, consistent with USG policy, is that NSF could simply be notified in the event that research has been reviewed and the IRE has made a determination whether or not the research meets the definition of DURC. Consistency with the USG policy may relieve administrative burden.

*Award and Administration Guide* VI.B.5
The language in the AAG states that the PI or grantee organization should promptly notify the NSF Program Officer if "any of the research results could ***potentially be considered*** Dual Use Research of Concern" [emphasis added]. The United States Government (USG) DURC policy requires us to contact the USG funding agency only after the review of the research has occurred and a determination has been made. The language in the AAG suggests that NSF is imposing a requirement which may create an additional burden and is not part of the USG policy and procedures.

**AAG Chapter II.D.2, 3, & 5, pages II-7 to II-8: Final Project Report, Project Outcomes Report for the General Public, and Grant Closeout and AAG Chapter III.E., pages III-7 to III-8: Award Financial Reporting Requirements – Final Disbursement Reporting**
We note that the lack of uniformity in deadlines between programmatic reports (90 day deadlines) and financial reporting (120 days) may cause confusion. We note that the lack of uniformity in deadlines across Federal agencies may cause confusion, as well. Our recommendation would be to harmonize these deadlines as much as possible.

**AAG Chapter V.A., page V-1: Basic Considerations**
This chapter opens with a statement that "expenditures…must conform with NSF policies where articulated in the grant terms and conditions…" We appreciate the addition of this language and the comment that "NSF policies that have a postaward requirement are implemented in the grant terms and conditions."

**AAG Chapter V.D.1.b, page V-5: Indirect Costs**
In the second paragraph of this section, "de minimus" [*sic*] is misspelled.

**AAG Chapter VI.D.2.c, page VI-8 to VI-9: Public Access to Copyrighted Material and Chapter VI.E., pages VI-10 to VI-11: Publication/Distribution of Grant Materials**
We understand the importance of the public access policy. However, the administrative burden to comply with this policy for two dozen separate agencies is daunting. The requirements across the

agencies differ in terms of what should be submitted, how compliance will be monitored, and when the implementation will occur. Agencies also are using a variety of repositories, which will require institutions to learn new systems and procedures. All of these factors accumulate and signify larger workloads.

Our institution, like others, has devoted significant time and resources to learning how to use the PubMed Central system. We understand how it functions and have in-house expertise to help faculty members with questions and submissions. We encourage NSF to consider allowing use of an established, familiar system such as PubMed Central.

Thank you for your consideration of these comments and recommendations. Should you have any questions, please contact me at kmoreland@rsp.wisc.edu or (608) 262-3822.

Sincerely,

Kim Moreland
Associate Vice Chancellor for Research Administration and
Director, Research and Sponsored Programs