

July 13, 2016

Ms. Suzanne Plimpton
Reports Clearance Officer
National Science Foundation
Arlington, VA 22230

SUBJECT: NSF PAPPG for 2017

Dear Ms. Plimpton:

On behalf of the California Institute of Technology (Caltech) I am pleased to offer comments on the NSF Proposal and Award Policies and Procedures Guide (PAPPG) for 2017. We very much appreciate NSF's continuing proactive approach to revising the PAPPG. NSF is nearly alone among Federal agencies in making documents like the PAPPG available to the grantee community in advance of their effective dates and in seeking comments and suggestions from the researchers and administrators who are directly affected by the PAPPG requirements.

Overall, we are extremely pleased with this revision of the PAPPG. Combining the Proposal requirements with the Post Award administrative requirements into a single document represents an improvement over the previous approach to having "two separate documents in one." This makes the document much more user friendly.

We have several comments about specific sections of the PAPPG that are noted below.

Page II-15, Senior Personnel Salaries and Wages Policy

The PAPPG states that "NSF limits the salary compensation **requested in the proposal budget** for senior personnel to no more than **two months of their regular salary in any one year.**" (emphasis added). The policy is very clear that the focus is on **compensation requested**, and not on **salary expenditures**. We agree with and are supportive of that distinction.

Our concern here is largely a mechanical one. When we submit a proposal to NSF, how should we determine whether the amount of salary support being requested is "more than two months of their regular salary in any one year?" The answer is very simple if we are dealing with an investigator who has only one NSF grant. It gets

much more complicated for investigators with multiple NSF grants, with widely overlapping performance periods. Should we be looking at currently active NSF awards and trying to determine that if the current proposal is funded, will there be a one-year period in which the amount of salary requested will exceed two months of salary? Should we look at currently funded NSF proposals or also take into account pending proposals, as well?

We are seeking guidance in the PAPPG that provides some concrete steps to be followed to meet the policy requirement. In the absence of this guidance, we are never quite sure if the approach we are taking is or is not consistent with the policy.

Page II-21. Voluntary Committed and Uncommitted Cost Sharing

The discussion of voluntary committed and uncommitted cost sharing is very clear. The revisions to this section of the PAPPG have definitely improved the clarity.

Page II-31. Projects Requiring High-Performance Computing Resources, Large Amounts of Data Storage, or Advanced Visualization Resources

The information in this section is helpful for investigators who require high-performance computing resources, etc. It is good that the PAPPG has identified specific facilities that can provide advanced computational and data resources.

Page X-6. Indirect Costs, NSF Policy, Section D. 1. d.

The statement that continuing increments and supplements will be funded using the negotiated indirect cost rate in effect at the time of the initial award is improved over the previous edition of the PAPPG. The clarity is very helpful and should reduce any confusion or misunderstanding about the intentions of NSF in these situations.

We hope that our comments will be helpful as you prepare the final version of the 2017 PAPPG. Thank you again for providing us with the opportunity to review the draft PAPPG. Please contact me if you have any additional questions.

Sincerely,



Richard Seligman

Associate Vice President, Research Administration