

Comment on draft PAPPG

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To: Plimpton, Suzanne H. <splimpto@nsf.gov>;

Hi Suzanne,

I'm writing you to provide comment on the draft PAPPG, NSF 19-1, OMB Control Number 3145-0058.

New Chapter VII.B.3 of the draft PAPPG contains the following reference: (emphasis added)

3.Changes in PI/PD, co-PI/co-PD or Person-Months Devoted to the Project at the Initiation of NSF

a.Upon receipt of a notification specified in **Chapter VII.A.2**, NSF will consider: (a) the action(s) taken by the grantee; (b) the seriousness of the violation(s); and (c) the awardee's proposed plan to maintain the safety of personnel supported by an NSF award. The Foundation may take unilateral action, as appropriate, to initiate the substitution of the PI /PD or any co-PI/co-PD on an NSF grant.

b.When NSF invokes this authority, the grantee must nominate a substitute PI/PD or co-PI/co-PD via use of NSF's electronic systems. The substitute PI/PD's name or co-PI/co-PD's name, biographical sketch, current and pending support from all ongoing projects and proposals, must also be included in the request. The contact information for the substitute PI/PD or co-PI/co-PD also should be included. If approved by NSF, the Grants Officer will amend the grant. If not approved, or a substitute PI is not available, NSF may take steps, pursuant to Chapter XII.A to suspend or terminate the grant.

The section it references, Chapter VII.A.2, reads as follows:

2. Grantee Notifications to NSF

The following is a listing of grantee notifications to NSF, including a reference to where additional guidance is provided. All notifications must be submitted via use of NSF's electronic systems. With the exception of significant changes in methods or procedures and significant changes, delays or events of unusual interest, all notifications must be signed and submitted by the AOR via use of NSF's electronic systems.

- Grantee-Approved No-Cost Extension (i)
- Significant Changes in Methods or Procedures (Other than Changes in Objectives or Scope)
- Significant Changes, Delays or Events of Unusual Interest (Other than Changes in Objectives or Scope)
- Annual and Final Cost Share Notification by Recipient
- Conflicts of Interest that cannot be satisfactorily managed, reduced or eliminated and research that proceeds without the imposition of conditions or restrictions when a conflict of interest exists

This has the chilling effect that, upon receipt of a routine notification such as a Grantee-Approved No-Cost Extension or Annual Cost Share Notification, NSF will be considering "the seriousness of the violation" to take unilateral action and replace a PI. This seems incongruent with the listed notifications, none of which address any kind of harassment or violations. Whereas the comment on new chapter VII.B.3 refers to Important Notice Number 144, "Harassment," I believe that New Chapter VII.B.3's reference to Chapter VII.A.2 is not an applicable reference.

If the intent is that NSF take unilateral action upon a report of findings of harassment, a different and more applicable section of the PAPPG (or Important Notice No. 144 itself) should be referenced. As it stands, the draft PAPPG communicates that NSF will consider replacing a PI for taking a Grantee-Approved No-Cost Extension.

Please let me know if I can do or provide anything further to clarify my concern.

Thanks and best,

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