



## Cold Spring Harbor Laboratory

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Suzanne Plimpton, Reports Clearance Officer  
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Subject: Comment Request: National Science Foundation Proposal/Award; Information—NSF Proposal and Award Policies and Procedures Guide

Dear Ms. Plimpton:

On behalf of Cold Spring Harbor Laboratory (CSHL), I thank you for the opportunity to comment on the draft version of the *Proposal and Award Policies and Procedures Guide* (PAPPG). Our comments and concerns focus on the revised text seeking to clarify NSF's requirements regarding submission of current and pending support information that states the following:

**h. Current and Pending Support**

***Current and pending support information must be separately provided for each individual designated as senior personnel on the proposal through use of an NSF-approved format. Information must be provided about all current and pending support, including this project, for ongoing projects, and for any proposals currently under consideration from whatever source<sup>25</sup>, irrespective of whether such support is provided through the proposing organization or is provided directly to the individual. All projects and activities, current or proposed, that require a time commitment<sup>26</sup> from the individual must be reported, even if the support received is only in-kind (such as office/laboratory space, equipment, supplies, employees, students). The total award amount for the entire award period covered (including indirect costs) must be provided, as well as the number of person-months (or partial person-months) per year to be devoted to the project by the senior personnel involved. Concurrent submission of a proposal to other organizations will not prejudice its review by NSF, if disclosed.<sup>27</sup> If the project (or any part of the project) now being submitted has been funded previously by a source other than NSF, provide the required information describing the last period of funding.***

We support NSF's attempt to clarify longstanding requirements in response to concerns of potential foreign influence on the U. S. research enterprise. However, the revised text falls short of achieving this important objective. Rather than clearly reiterating the need to disclose all non-U.S. based support and appointments, the text now requires all-in kind contributions provided by U.S. organizations, such as start up support for new investigators to be disclosed, even if the support is irrelevant to the project under review. CSHL provides salary and other support to all of our principal investigators, including senior investigators who have completed their start-up support, above-the-cap salary, and support for core research resources.

This institutional support should not be required to be listed if it is not project specific. Is the intention of NSF to have university professors list all salary compensation for research teaching that is paid by student tuition? Such salary support is the equivalent of CSHL faculty receiving institutional salary support from our institutional endowment and is not project specific.

As an independent, non-profit research organization we provide the support needed for newly independent scientists to succeed in establishing their research labs. I am concerned that our support will now be used to identify our scientists as “well-funded” and not worthy of public research support. These early career scientists need to pursue the projects submitted for peer reviewed public funding and they should not be penalized by having to list broad, start-up funds. The disclosure of U.S. institutional support should be included under Facilities, Equipment and Other Resources available to an investigator, only for use as evidence of the adequacy of the resources available to perform the proposed studies, independent of their monetary value.

Since the portion of salary provided by a U.S. institution that is above mandatory Federal salary caps, we recommend that “above the cap” U.S. institutional salary support be exempt from additional current and pending support reporting.

The listing of support of in-kind items such as office/laboratory space, equipment, supplies, employees, students needs clarification. Those items at the applicant’s primary host institution should be listed in the Facilities, Equipment and Other Resource section of the grant. On the other hand, I agree that a US-based scientist applying for US tax-payer supported funds should be required to list all research activities that occur at another institution, including all foreign research activities, and such disclosure should include in-kind items.

We are also concerned that the inclusion of all consulting information regardless of relevancy to a proposed project and professional commitment will need to be identified in Current and Pending support. This requirement will be duplicative with Conflict of Interest disclosures already required and are being reviewed and reported by institutions as needed. We recommend that a maximum threshold of time and effort commitment be established for mandated reporting of such outside activities.

As the President of CSHL I am concerned with the recent reports of Federal Agency peer review processes being compromised by a very few scientists, including the theft of U.S. taxpayer supported discoveries and intellectual property. I wholeheartedly agree that further clarification of current and pending support is needed, however, I urge the NSF and the NIH to focus on the disclosure of sources of research support, financial interests, and affiliations that are at the root of current concerns. The revised language proposed by the NSF is an over encompassing solution with far ranging impacts that go beyond addressing the specific concerns NSF is attempting to address. I recommend that the NSF and the NIH develop a more strategic and focused plan to address the immediate issues at hand.

Your sincerely,



Bruce Stillman