

# PUBLIC SUBMISSION

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Recently Posted NSF Rules and Notices.

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Agency Information Collection Activities; Proposals, Submissions, and Approvals: National Science Foundation Proposal/Award Information-NSF Proposal and Award Policies and Procedures Guide

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## Submitter Information

**Name:** Cole Meisenhelder

**Address:**

83 Beacon St

Apt 1

Somerville, MA, 02143

**Email:** meisenhelder.cole@gmail.com

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## General Comment

I urge the agency to reconsider the implementation of the Personnel Policy on Foreign Government Talent Recruitment Programs. As a physicist I rely on both funding from the NSF and intensive collaboration with international physicists, both at US based institutions and abroad. As the policy states, "Openness [sic], transparency, and collaboration are essential for basic research". I have great concerns that this policy will have a significant chilling effect on such openness and transparency, and will hinder the advancement of basic research in the US. The notion that we need to implement policies to prevent the transfer of knowledge and expertise to the foreign country runs fundamentally counter to the way basic research should be conducted in the modern era.

The wording of this policy is sufficiently broad that it could potentially be applied to a significant number of good faith collaborative efforts. Furthermore, by being so broad it will almost certainly be applied selectively, and from current reports it is clear that this will likely be used to discriminate against ethnically Chinese scientists. Similar policies employed by the NIH have been used in exactly this manner (<https://www.bloomberg.com/news/features/2019-06-13/the-u-s-is-purging-chinese-americans-from-top-cancer-research>), and has led to a distressing and hostile atmosphere towards Chinese researchers. This type of discrimination should not be allowed to become the policy of any government agency in this country.

As scientists it is important to recognize discriminatory policies like this will prevent fruitful collaborations for fear of lost funding, and in so doing slow the advance of basic research.