



July 26, 2019

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Dear Ms. Plimpton,

On behalf of Brown University, I am writing in response to Federal Register Notice dated May 29, 2019 requesting comments on the National Science Foundation Proposal/Award Information-NSF Proposal and Award Policies and Procedures Guide.

**Reference II.C.2.h. Current and Pending Support (Page II-23):**

Existing Current and Pending support reporting requirements mandate that investigators report all current and pending support for ongoing projects and proposals from all sources, including internal funds allocated toward specific projects, provided that such activities require a portion of time of an investigator serving in a PI/PD role or as other senior/key personnel. NSF states that this requirement exists regardless of whether salary support is requested. The data elements that must be furnished are project-related data commonly included in institutional systems (start/end dates, award amounts and person-months).

The common understanding in the research community has been that such reporting requirements relate to the investigator's involvement in projects within the scope of the investigator's institutional appointment and any concomitant obligations. Expanding this to include activities **outside their institutional appointment**, such as approved outside consulting or work during the summer for 9-month faculty represents a significant departure from current accepted practice as well as from the way the data have been collected and used by NSF in the past.

Requiring institutions to include "*all projects and activities that require a time commitment must (no minimum has been established), even if the support received is only in-kind*" is also a

significant departure from current practice. By definition, in-kind support does not lend itself to the data elements currently required in Current and Pending forms (i.e., start/end dates, person months, project titles) and may be difficult to value following U.G. standards §200.306(e-h). Most in-kind support that will benefit the project is currently reported in the Facilities, Equipment and Other Resources section of the proposal and is not quantified. We ask that NSF carefully consider the reporting mechanisms and information required for in-kind support.

Requiring institutions to include consulting and other outside activities is a change in policy that imposes a new significant burden on institutions and investigators. **NIH recently changed course with respect to this very issue, deleting an FAQ that explicitly required reporting of consulting as “Other Support.”** We therefore urge NSF to harmonize with NIH and return to the longstanding and commonly understood limitation on Current and Pending Support to activities within the scope of the investigator’s institutional responsibilities.

It is also important for NSF to understand that some of the expanded requirements will require time before they can be effectively implemented (more than the time between now and January 2020). Institutional IT systems are likely to require re-engineering and investigators must be trained in the new requirements.

Finally, given the new level of detail requested and the timeliness of Current and Pending information, Brown requests that the NSF consider changing its practices to asking for the Current and Pending Support / Outside Professional Activities information only for those awards that may be selected for funding and not at the time of proposal. This will 1) reduce the administrative burden for the vast majority of applicants (>75%) not selected for funding, 2) reduce the risk of revealing the researcher's personal confidential financial information, and 3) ensure that the NSF has the most up to date information prior to issuing a new award.

Sincerely,



Jill C Pipher, Ph.D.  
Vice President for Research  
Elisha Benjamin Andrews Professor of Mathematics

cc: Office of Sponsored Projects