

July 29, 2019

Suzanne Plimpton, Reports Clearance Officer
National Science Foundation
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Arlington, VA 22230
Email: splimpto@nsf.gov

Dear Ms. Plimpton:

Thank you for the opportunity to comment on the National Science Foundation's "Proposal and Award Policies and Procedures Guide (PAPPG)" draft. The University of Kansas appreciates NSF's dedication to adding clarity to this guide. Our institution is a member of the Council on Government Relations (COGR) and we strongly support COGR's thoughtful and detailed response to the Request for Comments. There are two areas highlighted by COGR where we respectfully wish to emphasize the need for additional clarifications to be added in the Guide's **Chapter II: Proposal Preparation Instructions**.

Under **II.C.1.d. Certification for Authorized Organizational Representative (AOR) or Individual Proposer** on page II-4, the AOR is required to certify the "accuracy and completeness of statements contained in the proposal." For the additional data being requested on Current and Pending Support, the AOR may not have any institutional resources available to provide this level of assurance for data, which must be obtained from investigators on their outside commitments, and cannot be independently verified by the institution. This type of data's completeness and accuracy rests with the individual investigator. To this end, we ask that NSF explicitly acknowledge that an AOR's certification of a proposal includes dependence on investigator-provided data.

Under **II.C.2.h. Current and Pending Support** on page II-23, the scope of information to be included for each investigator has been broadened quite significantly. The new wording can be interpreted to require reporting of time commitments outside the investigator's institutional appointment. We would ask for this language to be clarified to indicate that only time commitments related to their institutional appointments are required. We also request that NSF clarify expectations on reporting and calculation of the total award value and dates for the provided examples of in-kind support ("office/laboratory space, equipment, supplies, employees, students"). We support COGR's suggestion that Current and Pending Support is not an optimal mechanism if NSF needs this information to be reported.

Sincerely,



Simon Atkinson
Vice Chancellor for Research
University of Kansas