



July 29, 2019

Suzanne H. Plimpton, Reports Clearance Officer  
National Science Foundation  
2415 Eisenhower Avenue  
Alexandria, VA 22314  
*Sent via email to:* [splimpto@nsf.gov](mailto:splimpto@nsf.gov)

Subject: National Science Foundation Proposal/Award Information—NSF Proposal and Award Policies and Procedures Guide  
Federal Register/Vol. 84, No. 103/Wednesday, May 29, 2019 (24827)

Dear Ms. Plimpton:

The University of Wisconsin-Madison (UW-Madison) is a member institution of the Council on Governmental Relations (COGR) and endorses the COGR letter. Along with endorsing the COGR letter, we would like to offer the following comments on the NSF Proposal and Award Policies and Procedures Guide (PAPPG).

Participant Support, page 48 of 164

Thank you for clarifying that costs associated with an NSF-sponsored conference (e.g., rental fees, catering costs, supplies, etc.) should be included in the “Other Direct Costs” category. That should help alleviate confusion about where these costs should be budgeted and if they are subject to F&A.

We would recommend omitting the wording “secured through a service agreement/contract” in the sentence, “Costs related to an NSF-sponsored conference (e.g., venue rental fees, catering costs, supplies, etc.) that will be secured through a service agreement/contract should be budgeted on line G.6., “Other Direct Costs” to ensure appropriate allocation of indirect costs.” Neither institutional purchasing policies nor the Uniform Guidance require that these types of purchases be made solely through service agreements or contracts. A purchase of a small dollar amount may be made through some other mechanism, but the PAPPG wording suggests that a service agreement or contract is the

only suitable mechanism for making such purchases. We believe that is not the case and that the language should not suggest as such.

Publication/Documentation/Dissemination, page 49 of 164

We believe that data deposit and curation costs would fall into the category of “sharing of research results” and therefore be allowable if incurred after the end of the period of performance but before closeout, consistent with 200.461. Please confirm.

Current and Pending Support, page 53 of 164

*NSF-approved format*

NSF indicates that Current and Pending Support documents must be provided through use of an NSF-approved format. We are curious to know what this format will look like. UW-Madison has created an internal, electronic tool (that pulls information from data sources on our campus) to enable PIs and their administrators to create Current and Pending/Other Support documents for multiple sponsors, including NSF. Given that our PIs and administrators are accustomed to this tool, we hope that moving to an NSF-approved format will not create additional administrative burden for our institution.

*Consulting*

Information on current and pending support has historically included activities in which an individual engages as part of their institutional appointment. For this appointment, an individual is compensated with an institutional base salary (IBS). 2 CFR 200.430 states that “IBS excludes any income that an individual earns outside of the duties performed for the IHE.” Our institution considers [outside consulting agreements](#) to be made with the investigator as an individual, separate from and outside of the individual’s university appointment. Consulting agreements are not negotiated, reviewed, or signed by UW-Madison. As such, the inclusion of consulting in the list of potential sources of Current and Pending Support will cause confusion for our investigators, who are unused to including anything on Current and Pending Support that is outside of their work on behalf of UW-Madison. The inclusion of consulting will create significant burden and necessitate that both investigators and administrators adjust to new requirements.

Outside Activity Report information is maintained in a system separate from information used at UW - Madison to prepare Current and Pending support documents. The two systems are distinct from one another and managed by different offices. A new infrastructure would need to be created to ensure that relevant consulting arrangements are reported on Current and Pending Support documents. This will create substantial administrative burden and costs for our university.

Also, the time component of consulting activities is reported quite differently from projects listed in Current and Pending Support. Projects listed in a Current and Pending Support document typically list the total award period covered, as well as the number of person months committed to the project. In UW-Madison’s Outside Activities Reporting system, time spent on an activity is reported on a calendar

year basis, not in terms of a start and end date. For a given calendar year, individuals are asked to report a range of days that they spent on the activity (Fewer than 10 days; 10 to 50 days; more than 50 days). This reporting is unlike what is expected in Current and Pending Support and would not be easily translatable to person-months.

Finally, if an individual engages in outside consulting, certain (not all) consulting arrangements must be reported to UW-Madison as part of our Outside Activities Reporting process and reviewed by our institutional conflict of interest committee. Outside Activity Reports include information about compensation received, ownership interest, leadership positions, and travel (for investigators with PHS-funded research). Because these are activities in which individuals engage outside of one's university appointment, inclusion of these activities might well result in an individual reporting person-months in excess of 12 months. Should that be the case, does NSF anticipate creating a standard for an acceptable threshold of time that can be devoted to outside activities? Large universities handle consulting activities somewhat differently, but it would be highly unusual for a federal agency to make determinations about faculty activities separate from sponsored programs.

#### *Internal funds allocated toward specific projects*

Another example of support to be included in Current and Pending is internal funds allocated toward specific projects. UW-Madison has internal funds that are allocated toward specific projects, but that do not require a specific time commitment. Instead of reporting on time spent, investigators with these funds are expected to report on research results. Because there is no specific time commitment expected, there is not one proposed or reported. Would NSF be comfortable with zero person-months listed for these types of projects? Or, since there is no time commitment, should we simply exclude these projects?

#### *In-kind support*

The proposed language includes in-kind support. If the support being provided is in-kind, it may very well not have a specific time commitment associated with it. Would NSF be comfortable if this type of support were listed with zero person-months included? Additionally, provision of in-kind support information in Current and Pending Support is confusing vis-à-vis the requirement to describe Facilities, Equipment, and Other Resources to be provided to the project. How will institutions determine which resources should be listed in Current and Pending Support versus Facilities, Equipment, and Other Resources?

#### Conference Proposals, page 72 of 164

Part g. Meals and Coffee Breaks, fourth sentence makes reference to 2 CFR §200.474(b)(3). There does not appear to be a subpart (b)(3) in 200.474. Should this refer to subpart (b)(2)?

Thank you for the opportunity to comment on the PAPPG. The UW-Madison is grateful to the National Science Foundation for engaging in dialogue with the research community. Should you have any

questions about these comments, please feel free to contact me at [kmoreland@rsp.wisc.edu](mailto:kmoreland@rsp.wisc.edu) or (608) 262-3822.

Sincerely,

A handwritten signature in black ink, reading "Kim Moreland". The signature is written in a cursive style with a large, stylized "K" and "M".

Kim Moreland, Associate Vice Chancellor and  
Director, Research and Sponsored Programs