



FASEB

Federation of American Societies
for Experimental Biology

Representing Over 130,000 Researchers

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July 25, 2019

Suzanne H. Plimpton
Reports Clearance Officer
National Science Foundation
2415 Eisenhower Avenue
Suite W18200
Alexandria, VA 22314

Transmitted electronically via email to splimpto@nsf.gov

Dear Ms. Plimpton,

The Federation of American Societies for Experimental Biology (FASEB) appreciates the opportunity to provide feedback on the [proposed updates](#) to the National Science Foundation's (NSF's) Proposal and Award Policies and Procedures Guide (PAPPG) as posted in the [Federal Register](#) on May 29, 2019. We welcome NSF's efforts to clearly communicate proposed changes in this key resource for those planning to apply for NSF funds.

Overall, we found the proposed changes to be straightforward with well-presented rationales. Preparation of research funding proposals and differing application and reporting processes are [commonly cited sources of regulatory burden](#) within the FASEB community, so we appreciate interagency efforts to streamline researchers' effort.

Given growing concerns about the non-reporting of foreign sources of grant funding, FASEB also supports the clarification of NSF's longstanding requirement for applicants to disclose current and pending support. Coupled with Dr. Cordova's recent [Dear Colleague Letter](#), this shows a strong commitment to proper stewardship of federal funds. Similarly, we also applaud the expanded background on Responsible and Ethical Conduct of Research (RCR), particularly highlighting the role of institutions as stewards of research ethics and citing the three recent National Academies of Sciences, Engineering, and Medicine (NASEM) reports^{1,2,3} related to appropriate professional and scientific conduct.

¹ NASEM (2017). "[Fostering Integrity in Research](#)." Accessed on July 18, 2019.

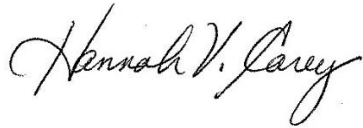
² NASEM (2018). "[Sexual Harassment of Women: Climate, Culture, and Consequences in Academic Sciences, Engineering, and Medicine](#)." Access on July 18, 2019.

³ NASEM (2019). "[Reproducibility and Replicability in Science](#)." Access on July 18, 2019.

The Draft PAPPG indicates that biographical sketches must be provided for each individual designated as senior personnel through use of an NSF-approved format. An associated comment states that a description of the NSF-approved format(s) will be posted on the NSF website when the PAPPG is issued. To avoid any confusion, we encourage NSF to include in this section of the PAPPG further details about the NSF-approved format(s) and a link to the format(s) on the NSF website when the PAPPG is issued.

Thank you for engaging the research community in the review of the proposed changes to the PAPPG and providing ample time for comment. We appreciate the efforts of NSF staff to clarify and streamline the processes associated with NSF grant proposals and awards.

Sincerely,

A handwritten signature in black ink, reading "Hannah V. Carey". The signature is written in a cursive, flowing style with a large initial 'H' and a long, sweeping underline.

Hannah V. Carey, PhD
FASEB President