

July 29, 2019

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

Subject: Comment Request: National Science Foundation Proposal/Award;
Information—NSF Proposal and Award Policies and Procedures Guide

Dear Ms. Plimpton:

On behalf of the University of Chicago, I am writing to provide comments to the Proposed NSF Proposal and Award Policies and Procedures Guide. As a member of the Council on Governmental Relations (COGR) we support the comments and recommendations made in their letter in response to the request for comments. In addition, we wish to specifically comment on the changes to report outside activities as Current, and Pending support.

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

As pointed out in the COGR letter, existing Current and Pending support reporting requirements mandate that investigators report project support and proposal information 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.

Our understanding has been that such requirements relate to the investigator's *institutional appointment* and any external funds provided to the investigator for project support. Expanding this to include activities outside their institutional appointment, such as approved outside consulting or work during the summer for 9-month faculty is a significant change from current accepted practice. At the University of Chicago, any outside activities that result in personal payment, equity ownership, or a non-paid appointment with an international organization are disclosed as part of the annual conflict of interest disclosure process. Those disclosures are reviewed and analyzed for any

July 29, 2019

Page 2

potential conflict of interest and conflict of commitment with their University activities. If a conflict exists, it is eliminated or managed. These activities are considered outside activities and are specifically excluded from their University commitment but are managed to assure they do not conflict with their University commitment and responsibilities. This important distinction has existed for many years in policy, guidance and training on the topics of Conflict of Interest and Conflict of Commitment. These activities are disclosed and managed under the NSF Conflict of Interest requirements and requiring additional reporting in Current and Pending support is unnecessary and adding burden through a second reporting obligation. It is also important to point out that the outside activities are much different in scope as these are usually consulting type engagements that are not project based and have no fixed start and end dates, have no fixed dollar amount to report and therefore do not fit the standard reporting formats that NSF requires for Current and Pending support. We ask that NSF reconsider this requirement in view of the conflict of interest disclosure requirements that already exist and remove the requirement for reporting outside activities a second time through Current and Pending support.

We also want to emphasize our support for the COGR comments regarding new reporting formats and clear definitions of what should be reported. The COGR letter states: *"We ask that NSF work with COGR and FDP in developing the new electronic format mentioned in the NSF comment, with an eye toward minimizing burden. We also recommend that NSF work with COGR to make sure it is clear to the community what does and does not need to be reported. For example, based on the new language in the PAPPG, we understand that institutional start-up funding for PIs and Senior Personnel, which does not require a specific time commitment, need not be reported as Current and Pending Support."*

Thank you for the opportunity to provide comment. As always, we appreciate the partnership with NSF in our research endeavors for the benefit of present and future generations. If you have any questions related to our comments, please contact me or Michael Ludwig at 773-702-8604.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Ka Yee Lee', with a stylized flourish at the end.

Ka Yee Lee
Vice Provost for Research
University of Chicago