

**From:** [Page, Niki Lynn](#)  
**To:** [Plimpton, Suzanne H.](#)  
**Cc:** [Hanold, John W](#); [Croft, Kimberly Sue](#)  
**Subject:** [EXTERNAL] - "For Comment" version of the NSF Proposal & Award Policies & Procedures Guide published in the Federal Register  
**Date:** Monday, July 29, 2019 4:09:46 PM  
**Attachments:** [image001.png](#)  
[NSF\\_20-1 FINAL Review Comments Penn State.docx](#)

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**ATTN: Suzanne Plimpton**

**Penn State University RESPONSE to the "for comment" version of the NSF PAPPG 20-1.**

**Please accept the attached comments from the Penn State Research Community. If you should have questions or require clarification, please feel free to contact me directly.**

**We appreciate the opportunity to review the PAPPG 20-1.**

**Many thanks,  
Niki**

**on behalf of the Pre-Award Working Group  
at The Pennsylvania State University**

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**From:** COGR Administrator <[administrator@COGR.edu](mailto:administrator@COGR.edu)>  
**Sent:** Wednesday, May 29, 2019 9:51 AM  
**To:** COGR LISTSERV <[COGRLISTSERV@COGR.edu](mailto:COGRLISTSERV@COGR.edu)>  
**Subject:** "For Comment" version of the NSF Proposal & Award Policies & Procedures Guide published in the Federal Register

**COGR Membership,**

## The Pennsylvania State University Draft NSF 20-1 PAPPG response and comments

**Page No:** I-1

**Section:** B. NSF Programs and Funding Opportunities

Paragraph: Web link sentence: interests. “NSF Update” is available on NSF’s website at:

**Comment:** Just a format change to add a hard return after the “at:” so the text will not justify the sentence with the rest of the paragraph.

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**Page No:** I-3

**Section:** C. Categories of Funding Opportunities

Paragraph: 4. Dear Colleague Letters (DCLs) DCLs are intended to provide general information to the community, clarify or amend an existing policy or document, or inform the NSF proposer community about upcoming opportunities or special competitions for supplements to existing awards. In addition, DCLs are often used to draw attention to an impending change in NSF policies or programs.

**Comment:** Since the DCLs do not always generate full proposals or funding opportunities, we would recommend moving them to Section B – NSF Programs and Funding Opportunities; or including a reference in both sections.

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**Page No:** I-3

**Section:** D. Types of Submissions                      Letters of Intent

Paragraph: 1. Letters of Intent (LOI). Some NSF program solicitations require or request submission of an (LOI) in advance of submission of a full proposal. An LOI is not a binding document. The predominant reason for its use is to help NSF program staff gauge the size and range of the competition, enabling earlier selection and better management of reviewers and panelists. In addition, the information contained in an LOI is used to help avoid potential conflicts of interest in the review process.

An LOI normally contains the Principal Investigator’s (PI’s) and co-PI’s names, a proposed title, a list of possible participating organizations (if applicable), and a synopsis that describes the work in sufficient detail to permit an appropriate selection of reviewers. An LOI is not externally evaluated or used to decide on funding. The requirement to submit an LOI will be identified in the program solicitation, and such letters are submitted electronically to NSF. Failure to submit a required LOI identified in a program solicitation will result in a full proposal not being accepted or returned without review.

**Comment:** We propose an overall change to the LOI process (for the purpose/sake of consistency), to make all LOI submissions mandatory from an AOR (not the PI).

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**Page No:** II-2

**Section:** B. Format of the Proposal

Paragraph: 1. Proposal Pagination Instructions. Proposers are advised that FastLane does not automatically paginate a proposal. Each section of the proposal that is uploaded as a file must be individually paginated prior to being uploaded to the electronic system.

**Comment:** We recommend adding a statement about the features in Research.gov. Suggested text could read like: “However, Research.gov paginates all documents consecutively, so there is no need to paginate documents when submitting through Research.gov.”

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**Page No:** II-7

**Section:** e. Collaborators & Other Affiliations Information

Paragraph: After the COA template Table 5:

**Comment:** ADDITIONAL TEXT is needed after “The template has been developed to be fillable, however, the content and format requirements must not be altered by the user.” The sentence and an additional one afterwards would ideally read: “The template has been developed to be fillable; however, the content and format requirements must not be altered by the user; e.g., do not change the column sizes or the font type. You can, however, insert rows as needed to add more names. Also, to fit long names or other information in a cell, reduce the font size so it fits in the cell.”

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**Page No:** II-8

**Section:** a. Cover Sheet

Paragraph: (a) Title of Proposed Project

**Comment:** Please add clarification that the title is limited to 180 characters, per the FastLane system; and (we think) 135 characters, per the Research.gov system.

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**Page No:** II-10

**Section:** b. Project Summary

Paragraph: Each proposal must contain a summary of the proposed project not more than one page in length. The Project Summary consists of an overview, a statement on the intellectual merit of the proposed activity, and a statement on the broader impacts of the proposed activity.

**Comment:** This requirement is not just one page in length, but it appears to have a character limit if entered in the text boxes in FastLane. We request that the current character limit be added to the text. Clarification for both FastLane and Research.gov would be suggested.

When the proposal team prepares draft text, they often perform this editing phase outside of the FastLane system with a word processor such as MS Word. Once the project summary has been finalized and pasted

into the text boxes, faculty are often surprised that their “1 page” Word summary doesn’t fit into the defined space within FastLane. This results in many iterations as the faculty work to reduce the amount of text to fit the FastLane allotted space. Listing the character limit would eliminate this confusion.

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**Page No:** II-10

**Section:** b. Project Summary

Paragraph: General comment

**Comment:** Please add clarification about whether the project summary should be written in the 3<sup>rd</sup> person. We have received requests and comments from NSF Program Officers in the past few months that the summary should be in the 3<sup>rd</sup> person, but this clarification has been removed from the NSF PAPPG.

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**Page No:** II-11

**Section:** d. Project Description (including Results from Prior NSF Support)  
(i) Content

Paragraph: General comment

**Comment:** We appreciate this update to the project description section and realize some investigators will opt to keep the Intellectual Merit header within their text. Will the Research.gov system compliance verification check, cause an error or reject the application if a PI chooses to keep the Intellectual Merit header?

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**Page No:** II-13

**Section:** e. References Cited

Paragraph: Reference information is required. Each reference must include the names of all authors (in the same sequence in which they appear in the publication), the article and journal title, book title, volume number, page numbers, and year of publication. (See also Chapter II.C.2.d.(iii)(d)) If the proposer has a website address readily available, that information should be included in the citation. It is not NSF's intent, however, to place an undue burden on proposers to search for the URL of every referenced publication. Therefore, inclusion of a website address is optional. A proposal that includes reference citation(s) that do not specify a URL is not considered to be in violation of NSF proposal preparation guidelines and the proposal will still be reviewed.

**Comment:** We request clarification be added for references of large collaborative groups, ie. CREAM and ICE CUBE, where there are hundreds of authors and collaborators to list. Should these be listed in their entirety or are et. al's acceptable? Should a full list be loaded into supplemental documents or single documents? Jean Feldman provides clarifications around this point in many of her presentations and conferences. It would benefit the community to have her recommendations included in the PAPPG.

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**Page No:** II-13

**Section:** f. Biographical Sketch(es)

Paragraph: General comment

**Comment:** Please elaborate on “NSF will only accept PDFs that are generated through use of an NSF-approved format.” Will both SciENCv PDF and a person’s generated PDF CV be acceptable, so long as they meet the PAPPG guidelines?

The recent notifications about the use of SciENCv are confusing to the research administration and faculty communities. This format, while available for use with NIH applications, is not the ONLY acceptable way to generate a PDF approved format for NIH. The current NSF text seems to indicate that ONLY PDF’s from SciENCv will be accepted. Please clarify.

We also have found that faculty choosing to transition to the SciENCv early cannot use this format with submissions being entered into the Research.gov portal, because a margins error is generated.

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**Page No:** II-14

**Section:** f. Biographical Sketch(es)

Paragraph: Education and Postdoctoral Training section

**Comment:** For the “Location”; please include format examples...see below suggestions:  
Location (city, state)  
Location (city, foreign country)

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**Page No:** II-14

**Section:** f. Biographical Sketch(es)

Paragraph: (d) Synergistic Activities

**Comment:** Current sentence reads, “Examples with multiple components are not permitted.” We suggest further clarification around the types of items NOT permitted. Possible edit to sentence: “Examples with multiple components, such as committee member lists, sub bulleted highlights of honors and prizes, or a collection of grants and research awards, are not permitted.”

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**Page No:** II-15

**Section:** a. Senior Personnel Salaries & Wages Policy

Paragraph: As a general policy, NSF limits the salary compensation requested in the proposal budget for senior personnel to no more than two months of their regular salary in any one year. It is the organization’s responsibility to define and consistently apply the term “year”. This limit includes salary compensation received from all NSF-funded grants. This effort must be documented in accordance with 2 CFR § 200, Subpart E, including 2 CFR § 200.430(i). If anticipated, any compensation for such personnel in excess of two months must be disclosed in the proposal budget, justified in the budget justification, and must be specifically approved by NSF in the award notice budget.<sup>19</sup> Under normal rebudgeting authority, as described in Chapters VII and X, a recipient can internally approve an increase or decrease in person months devoted to the project after an award is made, even if doing so results in salary support for senior personnel exceeding the two month salary policy. No prior approval from NSF is necessary as long as

that change would not cause the objectives or scope of the project to change. NSF prior approval is necessary if the objectives or scope of the project change.

**Comment:** We ask that the 2-month rule described above be removed from the proposal budget requirements. Given that our rebudgeting authority can allow for internal approvals of increased or decreased effort/person months, we do not understand why this requirement is still part of the NSF PAPPG.

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**Page No:** II-16

**Section:** c. Procedures

**Paragraph:** The names of the PI(s), faculty, and other senior personnel and the estimated number of full-time-equivalent person-months for which NSF funding is requested, and the total amount of salaries requested per year, must be listed. For consistency with the NSF cost sharing policy, if person months will be requested for senior personnel, a corresponding salary amount must be entered on the budget. If no person months and no salary are being requested for senior personnel, they should be removed from Section A of the budget. Their name(s) will remain on the Cover Sheet and the individual(s) role on the project should be described in the Facilities, Equipment and Other Resources section of the proposal.

**Comment:** We request a revision to how the FastLane Budget Page collects and sorts the names listed under Section A. Senior Personnel. It would be preferred to always have the PI show as the first person in Section A, with the remaining Senior Personnel falling into alphabetical order.

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**Page No:** II-22

**Section:** Voluntary Committed and Uncommitted Cost Sharing

**Paragraph:** In order for NSF, and its reviewers, to assess the scope of a proposed project, all organizational resources necessary for, and available to, a project must be described in the Facilities, Equipment and Other Resources section of the proposal (see Chapter II.C.2.i for further information). While not required by NSF, awardee organizations may, at their own discretion, continue to contribute voluntary uncommitted cost sharing to NSF-sponsored projects. **As noted above, however, these resources are not auditable by NSF and should not be included in the proposal budget or budget justification.**

**Comment:** While voluntary uncommitted cost share is not auditable by NSF, if included in the Facilities and Other Resources section of a proposal, will it be REVIEWABLE by NSF and external reviewers? Our concern is that this sort of institutional contribution will still impact reviewers and applications that are selected.

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**Page No:** II-23

**Section:** h. Current and Pending Support

**Paragraph:** General comment

**Comment:** We appreciate NSF's clarification on what items should be included in an investigator's current and pending list. Inclusion of some of these items has not been our common practice. Our comments are geared toward the NEW electronic format (or formats) that will be implemented to collect the current and pending information; and the fact that upload or PDF will no longer be permitted.

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Further examples or a FAQ to elaborate on the types of project and activities would be helpful to the investigators/researchers. If projects are support by internal funds (such as start-up packages) do these activities need to be included?

We hope the new format includes text boxes for researchers to provide context on why a particular time commitment has been included. It would also be helpful for the electronic format to have a way to delineate between projects being supported by the investigator's institution vs. projects an investigator manages on their own. **Inclusion of non-institutional support and activities are not "verifiable" details that an institutional AOR can confirm before submission or should be held accountable to confirm.**

In particular, guidance is requested for:

Source of Support – can researchers list generic sources (gifts, or private consulting), or will you require the specific funding source name?

Location of project - needs instructions for when an activity is outside the home institution.

Person-months per year – can this be left blank if only in-kind support is received?

Support:	<input type="checkbox"/> Current	<input type="checkbox"/> Pending	<input type="checkbox"/> Submission Planned in Near Future	<input type="checkbox"/> *Transfer of Support
Project/Proposal Title:				
Source of Support:				
Total Award Amount:		Total Award Period Covered:		
Location of Project:				
Person-Months Per Year Committed to the		Cal: 0.00	Acad: 0.00	Sumr: 0.00

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**Page No:** II-25

**Section:** 5. plans for archiving data, samples, and other research products, and for preservation of access to them.

**Paragraph:** Simultaneously submitted collaborative proposals and proposals that include subawards are a single unified project and should include only one supplemental combined Data Management Plan, regardless of the number of non-lead collaborative proposals or subawards included. In such collaborative proposals, the data management plan should discuss the relevant data issues in the context of the collaboration.

**Comment:** We would propose to further clarify this sentence such as, "In such collaborative proposals, the data management plan should discuss the relevant data issues in the context of the collaboration and include a separate section that specifies how data will be shared, managed, and stored at the various sites."

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**Page No:** II-29

**Section:** 4. Proposals Involving Vertebrate Animals

Paragraph: b. Sufficient information must be provided within the 15-page Project Description to enable reviewers to evaluate the:

- (i) rationale for involving animals;
- (ii) (ii) choice of species and number of animals to be used;
- (iii) (iii) description of the proposed use of the animals;
- (iv) (iv) exposure of animals to discomfort, pain, or injury; and
- (v) (v) description of any euthanasia methods to be used.

**Comment:** Our comment is not meant to request a rewrite of this section; rather our goal is to advocate for a separate proposal section to be created within the FastLane structure which will allow adequate space to document protocols and compliance practices. Removing “the sufficient information” out of the 15-page Project Description and permitting proposal teams a “page limitless” section to document this important component is critical. Such a change would align with current proposal practices at the National Institutes of Health.

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**Page No:** II-30

**Section:** 5. Proposals Involving Human Subjects

Paragraph: n/a – this requirement does not currently exist

**Comment:** Our comment is not meant to request a rewrite of this section; rather our goal is to advocate for a separate proposal section to be created within the FastLane structure which will allow adequate space to document protocols and compliance practices. Removing “sufficient information” out of the 15-page Project Description and permitting proposal teams a “page limitless” section to document this important component is critical. Such a change would align with current proposal practices at the National Institutes of Health.

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[illegible]

NSF published a notice today in the [Federal Register](#) announcing the availability of a “For comment” draft of the *Proposal & Award Policies & Procedures Guide* (PAPPG). The Foundation is accepting comments from the external community until **cob July 29, 2019**. The draft PAPPG is available on the [Policy Office website](#).

Any questions should be directed to the Policy Office at [policy@nsf.gov](mailto:policy@nsf.gov).

Best,

Jean



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