Suzanne Plimpton, Reports Clearance Officer
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Subject: Comment Request: National Science Foundation Proposal/Award; Information—NSF Proposal and Award Policies and Procedures Guide

Dear Ms. Plimpton:

The University of Colorado appreciates the opportunity to offer comments on the draft version of the 2020 PAPPG. We have reviewed the COGR's draft comments, and are in agreement with them. In addition, we would like to add the following:

While this is already iterated in COGR's letter, we would like to emphasize that II.C.1.d. Certification for Authorized Organizational Representative (AOR) or Individual Proposer (Page II-4), regarding NSF's inclusion of projects and activities outside of the PI's institutional appointment is especially problematic. Our PIs are responsible for updating their institutional record at the beginning of each calendar year, and as their situations change. However, the AOR is only able to verify that the PI's record has been through the annual review, and has no way to verify the accuracy and completeness of the institutional record on an ongoing basis. Responsibility for the completeness and accuracy of these types of data should rest with the individual investigator rather than be considered an institutional responsibility.

On page I-5, it states:
Categories of Proposers
Except where a program solicitation establishes more restrictive eligibility criteria, organizations **in the following categories** may submit proposals:

It then lists categories 1-7. However, categories 5-7 may NOT submit (unaffiliated individuals, foreign institutions, other federal agencies).

This is an issue that has been propagated through several iterations of the PAPPG. For absolute clarity, can this be broken out into two sections, one of categories that may submit, the other of categories that may not submit?

Finally, the new Current and Pending Support "new electronic format…Upload of pdf will no longer be permitted". This has us worried, and part of it may be the unknown, but the concerns are:
- Does the PI have to rebuild the current and pending with each proposal? (This is a huge burden for our Research Associates who are fully funded by soft money and thus have a lot of C&P);
- If it can be saved, does it mean that it can't be modified for other sponsors who might have different requirements? (Again, having to rebuild each time for multiple major sponsors, is going to be a burden);
- When will we receive clarification on the new format, will it be at the time of the release of the new PAPPG? We will need time to reach out to our campus partners to help them make the conversion. Research.gov already lists SciENcv as an approved format for the upcoming change to Biosketches

needing to be created through an NSF-approved generator. Can we expect to see a similar early notification about C&Ps?

We thank you for the opportunity to review and comment on the upcoming PAPPG.

All the best,

Kristi Winseck

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