

7.28.19

Suzanne H. Plimpton
Reports Clearance Officer
National Science Foundation
2415 Eisenhower Avenue
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Dear Ms. Plimpton,

I appreciate the opportunity to submit comments on the proposed changes to the National Science Foundation's (NSF's) Proposal and Award Policies and Procedures Guide (PAPPG) posted May 29, 2019. The revised guide will be extremely useful to investigators and institutions throughout the NSF funding application process. I find many of the revisions will very helpful in streamlining the submission process to reduce the regulatory burden on investigators and administrative support staff per OMB Memorandum M-18-24. Thank you for publicly communicating these changes with clarity and plenty of time for response.

The shift to using the System for Award Management (SAM) for maintaining certifications and representations is an excellent idea that should be helpful to both applicants and reviewers. The removal of the Certification Regarding a Drug-Free Workplace, the Certification Regarding Debarment and Suspension, the Certification Regarding Lobbying, the Certification Regarding Federal Tax Obligations, and the Certification Regarding Criminal Convictions seem appropriate in an attempt to reduce burden, as most of these issues are already reported and stated in other forms or phases of the submission process. However, the loss of the Certification Regarding Nondiscrimination (comment NSF3, page II-4) is concerning. There don't appear to be additional safeguards for nondiscrimination in the proposal or submission process beyond those provided by national legislation. Additionally, removing the certification also prevents discrimination protections from potential reviewers (comment NSF25, page II-48). Notably, the Pew Research Center has reported¹ significant inequalities in representation in STEM for minorities. The NSF's own recent reports²³ emphasize the loss of productivity and innovation caused by the existing lack of diversity in science. The NSF has been active in attempting to reduce and address such discrimination, as evidenced by its many anti-discrimination regulations and policies⁴ (most notably 45 CFR 611, 45 CFR 617, and 45 CFR 689). This is further reflected in the important

¹ PRC (2017). "[Women and Men in STEM Often at Odds Over Workplace Equity](#)." Accessed July 26, 2019.

² NSF (2018). "[Science and Engineering Indicators 2018 Report](#)." Accessed July 26 2019.

³ NSF (2019). "[Women, Minorities, and Persons with Disabilities in Science and Engineering](#)." Accessed July 28 2019.

⁴ NSF (2019). "[Policy and Guidance](#)." Accessed July 28 2019.

language you have added to the Responsible and Ethical Conduct of Research (RCR) section (comments NSF1-2, pages IX-3-4). Therefore, the removal of this certification, which emphasizes the importance of nondiscrimination to the NSF, seems incongruent with the NSF's ethos and could very well undermine these important efforts.

Perhaps a suitable solution would be to mandate that all funded investigators review and sign the Certification Regarding Nondiscrimination with their co-awardees as part of the RCR responsibilities section of the application process. This would promote the ideals set forth in the new wording to the RCR section without adding burden to the review process.

The NSF's support for STEM research in this country is essential to our future, and I am grateful for your commitment to public comment process. I am encouraged to see how the NSF is working with other government agencies to improve the funding application and renewal process and reduce administrative burden. Please feel free to contact me for further clarification or information regarding any of these suggestions; I appreciate your time and consideration in this matter.

Sincerely,
Julia Slocomb Dluzen
Ph.D.