

July 29, 2019

Suzanne H. Plimpton  
Reports Clearance Officer  
Office of the General Counsel  
National Science Foundation  
2415 Eisenhower Avenue  
Alexandria, VA 22314

Dear Ms. Plimpton:

The University of Arizona appreciates the opportunity to comment on the draft version of the National Science Foundation's Proposal and Award Policies and Procedures Guide (PAPPG).

We appreciate the additional clarifications in the following sections. The information in these items is very useful to sponsored projects officers and departmental research administrators assisting faculty with proposal preparation.

- **II.C.g.v. Participant Support** (page II-18), language clarifying expectations for budgeting NSF-Sponsored conferences
- **II.E.7. Conference Proposals** (page II-42) Conference proposal language on service agreements/contracts
- Throughout the document, reinforcement of what does/does not meet the definition of participant support

In addition, we have comments on the following sections:

**II.C.1.d. Certification for Authorized Organizational Representative (AOR) or Individual Proposer.** The proposed PAPPG guide revisions include data on faculty activities outside of their institutional commitments that are not tracked by our internal systems. We are not able to certify accuracy or completeness of data that exists outside of our systems. Individual investigators are better placed to certify this information.

**II.C.2.h. Current and Pending Support.** Expanding Current and Pending Support reporting requirements to activities that occur outside of institutional commitments creates an expectation that the institution is using the information for something other than ensuring a researcher is not over-committed, pursuant to 2 CFR 200.430(c). These activities are not captured in internal systems, and are not relevant to effort reporting requirements. The expanded reporting requirements are not compatible with current application forms. We hope that a method for reporting these items will take this into account. Information on activities outside a researcher's institutional commitments is often considered confidential. We would like to be reassured that



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access to this information be limited, and more clarity on how and when it will be used, and how the referenced new electronic format will be leveraged.

We appreciate the National Science Foundation's work with the Federal Demonstration Partnership (FDP) in the areas of reducing administrative burden to faculty, and hope that the NSF will continue to work with the FDP and other organizations to ensure these changes do not increase faculty burden.

Thank you for the opportunity to comment. The University of Arizona values how open, available, and collaborative the NSF Policy Office has always been.

If you have any questions about our comments, please contact Lori Schultz at [lschultz@email.arizona.edu](mailto:lschultz@email.arizona.edu).

Sincerely,

A handwritten signature in black ink, appearing to read 'Lori Ann M. Schultz'.

Lori Ann M. Schultz  
Senior Director, Research, Discovery & Innovation  
The University of Arizona