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DURHAM
NORTH CAROLINA
27708

FINANCIAL SERVICES
COST AND REIMBURSEMENT ACCOUNTING

BOX 104014
TELEPHONE (919) 684-5723
FACSIMILE (919) 684-8377

MEMORANDUM

July 29, 2019

Suzanne Plimpton, Reports Clearance Officer
National Science Foundation
4201 Wilson Blvd., Rm. 1265
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 Duke University, I appreciate the opportunity to provide comments on the draft version of the Proposal and Award Policies and Procedures Guide (PAPPG) through the formal rulemaking process. As one of the leading research universities within the United States, Duke faculty and staff conduct a wide array of federally-sponsored research projects.

As a member of the Council on Governmental Relations (COGR), Duke endorses the letter submitted by this Association dated July 29, 2019. Specifically, we offer the following additional comments:

Reference II.C.2.g.(vi)(b). Publication / Documentation / Dissemination (Line G2 on the Proposed Budget) (Page II-19):

We join COGR in appreciating the NSF's inclusion of the data deposit and data curation costs in the allowable expenses that may be requested on Line G.2. of the proposal budget. We agree that these charges, often incurred after the period of performance, are similar in nature to traditional publication costs. However, we would encourage the NSF to also consider allowing projects to charge estimates of data publication even in the event that the exact costs are unknown at the time of closeout. Otherwise these costs will result in unintentional cost sharing by the recipient institution.

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

We join COGR in encouraging NSF to reconsider what the University community sees as a significant and potentially significant expansion of current reporting requirements. Specifically, we encourage the Foundation to partner with fellow federal agencies who are in the process of reviewing and clarifying reporting requirements for support available to a researcher. A harmonization of the requirements and formats would best position the agencies to gather information in a way that would provide them a value-add, rather than adding unnecessary burden to the applicants and recipient institutions. In that discussion, we feel it is imperative that NSF remain true to the spirit of what Current & Pending is trying to accomplish – identifying and managing areas of potential over-commitment and overlap of financial

support. While we have appreciation for the current environment and scrutiny being placed upon federal sponsors, we feel a measured and coordinated approach would be most beneficial.

In general, it is our opinion that information should only be requested and provided on Current & Pending documents if it directly related to the research of the faculty. Specifically, for consulting and work performed during the summer months, this information should only be expected if it directly relates to the specific research aims of the project in question or if it could create commitment issues. As NSF knows, consulting and activities performed during the summer months, which is outside of the appointment, are largely coordinated and conducted by the researchers. Therefore, the university may have limited ability to verify and provide quality assurances of data provided by the researchers. If the Foundation does proceed, we also ask for clarification and guidance on the extent of the role and expectations for the recipient institution versus the researchers.

In addition, Duke agrees and supports COGR's comments regarding in-kind and timing of submission of Current and Pending documents.

Along with COGR, Duke looks forward to additional details and the opportunity to continue engaging on matters relating to the expectations and requirements of Current & Pending documentation.

Duke appreciates the opportunity to provide the NSF with our comments. I would be most willing to meet at any time to continue discussions relating to these considerations. Thank you for your efforts on behalf of the research community.

Sincerely,



James D. Luther

Associate Vice-President Finance & Research Costing Compliance Officer

Copy:

Alyssa Dack, Research Policy Coordinator

Keith Hurka-Owen, Director, Office of Research Support

Nate Martinez-Wayman, Director of Office of Post-Award Administration

John Michnowicz, Director, Office of Research Administration

Research Administration Continuous Improvement (RACI), Executive Committee