

Representing Over 110,000 Researchers

6120 Executive Blvd., Suite 230, Rockville, MD 20852 | faseb.org

June 2, 2023

Suzanne H. Plimpton Reports Clearance Officer National Science Foundation 2415 Eisenhower Avenue Suite E7400 Alexandria, VA 22314

Transmitted electronically via email to splimpto@nsf.gov

Dear Ms. Plimpton,

The Federation of American Societies for Experimental Biology (FASEB) appreciates the opportunity to provide feedback on the proposed updates to the National Science Foundation's (NSF's) Proposal and Award Policies and Procedures Guide (PAPPG) as posted in the *Federal Register* on April 13, 2023. We applaud NSF's efforts to clearly communicate proposed changes and underlying rationale for updates to this key resource for those planning to apply for NSF support.

Overall, FASEB found the proposed changes to be straightforward and necessary to reflect federal directives, namely implementation of the CHIPS and Science Act of 2022, Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations), and the National Security Presidential Memorandum 33 (NSPM-33), as well as process updates within NSF, including language to address new mechanisms to support research in undergraduate and predominantly undergraduate institutions and clarity regarding seeking and obtaining Tribal Nation permissions for proposals impacting Tribal resources and/or interests. We also appreciate the update to reflect inclusion and consideration of graduate students in addition to postdoctoral scholars in Mentoring Plans and removing Synergistic Activities as a component of the Biographical Sketch to make it a separate Senior Personnel document.

As NSF prepares to fulfill the directives within "Ensuring Free, Immediate, and Equitable Access to Federally Funded Research," issued by the White House Office of Science and Technology Policy (OSTP) to the Heads of Executive Departments and Agencies issued by in August 2022, FASEB encourages broad stakeholder engagement to ensure updates for the 2025 PAPPG clearly articulate all options available to researchers to meet the requirements of the updated NSF public access policy. Similarly, once proposed updates to NSF's public access plan are released to the

Full members: American Physiological Society • American Society for Biochemistry and Molecular Biology • American Society for Pharmacology and Experimental Therapeutics • American Society for Investigative Pathology • The American Association of Immunologists • American Association for Anatomy • Society for Developmental Biology • Association of Biomolecular Resource Facilities • The American Society for Bone and Mineral Research • The American Society for Clinical Investigation • Society for the Study of Reproduction • Endocrine Society • American College of Sports Medicine • Genetics Society of America • The Histochemical Society • Society for Glycobiology • Association for Molecular Pathology • Society for Redox
Biology and Medicine • Society For Experimental Biology and Medicine • American Aging Association • Society for Leukocyte Biology • American Federation for Medical Research • Shock
Society • Associate members: American Society of Human Genetics • Society for Birth Defects Research & Prevention • American Society for Nutrition

research community, we strongly encourage NSF to incorporate discussions regarding likely updates to the PAPPG to ensure alignment and clearly articulate expectations for grant applicants and awardees in this core resource.

Thank you for engaging the research community in the review of the proposed changes to the PAPPG and providing ample time for comment. The continued efforts of NSF staff to clarify and harmonize policies and procedures associated with NSF grant proposal preparation and awards management are greatly appreciated by FASEB and its constituents.

Sincerely,

Keffreye

Kevin C. Kregel, PhD FASEB President