

August 22, 2026

Submitted electronically via www.regulations.gov

Suzanne H. Plimpton
Reports Clearance Officer
National Science Foundation
Randolph Building, 401 Delany Street
Alexandria, Virginia 22314

Re: Comments of the Federation of American Societies for Experimental Biology (FASEB) on the *Draft NSF Guidance on Financial Assistance (GFA)*

Docket No. NSF-2026-OTR-0001; OMB Control No. 3145-0058

91 Fed. Reg. 38030 (June 24, 2026); Comment Deadline: August 24, 2026

Draft GFA replacing the NSF Proposal and Award Policies and Procedures Guide (PAPPG), NSF 24-1

Dear Ms. Plimpton:

I. Introduction and Statement of Interest

FASEB welcomes the opportunity to comment on the draft *NSF Guidance on Financial Assistance (GFA)*, which will replace the Proposal and Award Policies and Procedures Guide (PAPPG), NSF 24-1. FASEB is a federation of 21 U.S.-based scientific societies, collectively representing more than 100,000 researchers across the biological and biomedical sciences. Our societies produce and run the journals, meetings, educational efforts, and peer-review networks that transform federally funded research into tangible public outcomes, and our members hold and administer NSF and other multi-year federal awards.

We support the goals outlined in the draft GFA. Reducing administrative burden, writing in plain language, strengthening research security, and holding federally funded work to rigorous, merit-based standards are objectives FASEB has pursued since its 1912 founding in the United States. Executive Order 14303, *Restoring Gold Standard Science* (May 23, 2025), describes much of what our community already practices and has done so for more than a century. The GFA governs the full proposal and award lifecycle for the tens of thousands of proposals NSF receives each year, and several of its provisions directly impacts how American science competes, how the workforce is trained, and what taxpayers get as a return on their federal investment. FASEB has a substantial and concrete interest in the GFA, and those interests are aligned with the same goals of the agency.

As currently drafted, several key operational provisions in the GFA would work against the very outcomes NSF aims to achieve; adding burden rather than cutting it; weakening the return on research taxpayers have already paid for; and contrary to the Gold Standard Science tenets that Executive Order

14303 established as NSF policy. We identify each challenge below and recommend an alternative path forward. FASEB also filed comments with the Office of Management and Budget on the parallel revisions to 2 CFR 200 (Docket No. OMB-2026-0034). Because the GFA expressly aligns with that proposed rule, we incorporate our prior comments by reference [here](#) and respectfully request that NSF consider both submissions as a single, integrated record.

II. Summary of Recommendations

FASEB respectfully recommends NSF:

1. [Guide 8; Guide 11] **Keep merit-based, unbiased peer review as the primary decisioning path for award and continuation decisions**, and confine senior leadership and risk review to statutory eligibility and documented integrity concerns, as Executive Order 14303 directs;
2. [Guide 25] **Mid-award terminations should be rare and under a specified set of criteria**. Mid-award terminations should be confined to a limited set of grounds stated in the award, and before terminating, NSF should be obligated to weigh and document the sunk federal investment and the reliance interests at stake while preserving grantees a genuine right of appeal;
3. [Guide 7; Guide 4] **Keep conference and scientific-meeting attendance automatically allowable** where it is reasonably necessary to the funded work, rather than requiring case-by-case pre-approval in every award;
4. [Guide 12; Guide 4] **Keep reasonable publication and dissemination costs automatically allowable**, and resolve the contradiction between the GFA's disallowance of "publication costs" with the agency's mandate for immediate public access;
5. [Guide 14; Guide 6] **Deliver research security through specificity - targeted, risk-based measures** that protect the United States without shutting down open, reciprocal international collaboration that keeps American science ahead and allows researchers to recruit and retain the best and brightest from all over the world;
6. [Guide 19] **Confirm that recipients' statutory civil-rights and disability obligations remain in force**, so that removed cross-references are not misread as removed duties; and
7. [Overall] **Define the terms the guidance incorporates**, including "publication costs" and "national interest," before the GFA takes effect.

III. Merit Review Is How NSF Delivers Gold Standard Science and Maximum Value for the Taxpayer

FASEB supports NSF's continued reliance on merit review, and we are pleased to see Guide 8 keep the merit-review principles and the rule that reviewers be "free of conflicts that could bias their evaluations." Our aim here is to keep that commitment intact as the GFA aligns with Executive Order 14332 and the proposed 2 CFR 200. Under Guide 8, every funding recommendation now passes through a supervisory senior scientist, then senior program staff, then a grants-officer risk review before an award can issue. Guide 11 lets NSF, on its own initiative, replace a PI, cut funding, or suspend or terminate an award.

FASEB does not dispute the concept that agency leadership has a legitimate stewardship role; our concern is narrow. A political checkpoint that could overrule expert merit review, or a risk factor tied to an applicant's affiliations rather than to any documented misconduct, is hard to reconcile with the Administration's science integrity policy. Executive Order 14303 defines Gold Standard Science as science that is "subject to unbiased peer review" and conducted "without conflicts of interest." Since World War II, American science has rested on these two tenets: federal dollars fund the best proposals, and those decisions are judged by independent experts. That arrangement is the taxpayer's best protection, because it steers limited funds toward the work most likely to produce impactful results.

Recommendation. For individual proposals, state clearly in Guide 8 that senior-leadership and risk review are used to confirm statutory eligibility and documented integrity or research-security concerns, and do not displace the valuable merit-based judgment of independent experts. Limit individual pre-award risk assessment to objective, documented factors. Reconcile Guides 8 and 11 with the "unbiased peer review" and "without conflicts of interest" tenets of Executive Order 14303.

IV. Mid-Award Termination Should Be Rare Under a Specific Set of Criteria, Should Weigh Existing Investments, and Maintain a Real Right of Appeal

Guide 25 aligns NSF's termination provisions with the proposed 2 CFR 200 and expressly contemplates termination for "changes in priorities." Guide 26 sends appeals through internal review, with a report within 90 days and a "final, unappealable" decision by the NSF Chief Science Officer. We appreciate that NSF kept notice-and-cure procedures in most cases and reported terminations only after a recipient has had a chance to seek review. We provide feedback here on two key points.

First, a research award is not a procurement contract. It is the instrument an institution and a researcher builds a project on. A university hires staff, admits students, and makes commitments to trainees and, in clinical work, to human subjects. The outcome of an experiment is unknown when it is proposed. That is the entire reason to fund the project – to gain knowledge that can be used to improve the world and better human health. Known, reliable funding, lack of mid-project cancellations, and unexpected findings are a powerful piece of this process. Recombinant DNA, the Human Genome Project, GLP-1

medicines, clot-buster drugs, statins, and the traumatic brain-injury findings that now help America's veterans all grew out of work whose results no one could guarantee in advance, funding that was stable and not cancelled mid-award. Ending a meritorious, half-finished project because priorities shifted spends the tax-payer investment and returns unfinished science to the American public, an inefficient use of appropriated funds and the opposite of the stewardship the reforms are intended to achieve.

Second, good stewardship argues for process, not against it. Before a multi-year award is terminated for reasons other than performance or compliance, NSF should be required to evaluate what has already been spent, consider the reliance interests of the institution and its trainees, and propose less drastic options such as a modification or a no-cost extension.

Recommendation. Retain termination for rare cases, only where the ground is stated in the award's terms and conditions at the outset. Before terminating a multi-year award for reasons other than cause, require NSF to document its consideration of the sunk federal investment, the reliance interests at stake, and less disruptive alternatives, and preserve a genuine right of appeal with independent review.

V. Scientific-Meeting Attendance Reasonably Necessary to the Work Should Stay Presumptively Allowable

Guide 4 still allows travel to "attendance at meetings and conferences," but only where attendance is "necessary to accomplish proposal objectives or disseminate research results." Guide 7 supports conference proposals "only if equivalent results cannot be obtained by attendance at regular meetings of professional societies." FASEB supports careful stewardship of travel funds and shares the draft's emphasis on economy fares and cost discipline. What we caution against is language or a downstream practice that treats ordinary scientific-meeting attendance as suspect or that forces case-by-case pre-approval into each award.

Meetings are where results get tested, methods get challenged, collaborations start, and the next generation of scientists is recruited and trained. At Meetings, researchers subject each other to further merit-based review discussions, and counter opinions are presented by experts. This very process makes the final science better, towards accomplishing the objectives of Executive Order 14303, and is a bargain compared to the modest cost. Cutting investigators off from these venues or adding roadblocks turns American science inward and slows its pace, serving neither American competitiveness nor the workforce goals the Administration has emphasized. FASEB's own conferences bring more than 4,000 scientists together each year, mostly in the United States, and support the local economies that host them. Our 21 member societies host dozens more conferences; these venues add significant value. Over-restriction would fall hardest where discretionary support is thinnest, on early-career researchers and smaller institutions. Our member societies already report constraints of this kind affecting participation at scientific meetings over the past year.

Recommendation. Keep the longstanding presumption that travel reasonably necessary to the funded work is allowable, subject to existing reasonableness rules and NSF's economy-travel policy, rather than moving to a pre-approval process that would stifle scientific progress and workforce development.

VI. The Draft Contradicts Itself on Publication Costs, and the Public Taxpayer Loses Either Way

The Summary of Changes states Guide 12 “disallows publication costs consistent with proposed revisions to 2 CFR 200.” However, this contradicts other Guides within the GFA. Guide 21 requires investigators to deposit their accepted manuscripts in NSF’s Public Access Repository at or before publication, and it drops the former 12-month embargo. Guide 21 states that the deposit fees “are still allowable expenses on NSF awards.” Guide 4 lists “reports, reprints, page charges and illustrations” among the costs a budget may request. Guide 12 permits charging “allowable publication or research results sharing costs before closeout.” One sentence in the summary points one direction, while the text of at least three Guides points the other direction – this needs clarification.

A recipient cannot follow a rule that both requires public access and forbids paying for it. Grant and compliance reviewers cannot apply such a rule consistently either. Because the draft never defines “publication costs,” it is unclear whether the disallowance is applicable to open-access article charges, page and color charges, data-deposit and curation costs, or nothing at all.

These costs are a small share of a grant’s budget, often one to two percent. Yet this modest percentage is where the American taxpayer’s investment pays off, through the review and dissemination of the findings. A finding is validated, replicated, and built upon only after it is shared. Restrict the funds that make sharing possible and the work still gets done, but its value is isolated and unseen, which is exactly the kind of waste the reforms aim to remove. The heaviest cost falls on early-career investigators and on researchers at smaller institutions that lack the open-access agreements larger universities negotiate. That career stage or institutional affiliation is the part of the American workforce pipeline that America can least afford to weaken. Second, there is an integrity cost as well: when investigators are pushed to minimize publication spending, some work drifts toward lower-quality outlets who might skip key steps such as research integrity checks or worse, skipping merit-based peer review entirely – working in opposition to the transparency and peer review that Gold Standard Science demands. Lastly, this small percentage of investment ensures that the work the taxpayers funded stands solid for generations as a permanent record for science and knowledge to build on. Payment is not for one-time access, it is for *permanent* access to the record.

Recommendation. A range of publishing and dissemination models exists, and recipients should remain free to choose among them on their merits. Keep reasonable and necessary publication and dissemination costs allowable, including open access article publishing charges, page charges, and other approaches - subject to the usual reasonableness and allocability tests. At a minimum, delete the conflicting “disallows publication costs” statement, conform the Guides to one another, and define what (if anything) is being disallowed before the guidance is final. FASEB set out the allowability and integrity aspects of publication costs in our response to the NIH Request for Information on allowable publication costs (Sept. 12, 2025), which we incorporate [here](#) for additional context.

VII. Research Security Is a Shared Priority, Best Achieved Without Closing the Door on International Collaboration

FASEB shares NSF's commitment to protecting federally funded research from theft, misuse, and improper foreign interference. We support the draft's stated goal of safeguarding the security of science while keeping fundamental research open and collaborative. We want to emphasize that international collaborations are singularly important to driving successful U.S. science, and that the vast majority of international collaborations do not risk national security. This collaboration also goes to the ability of the United States to recruit the best and brightest from all over the world. If there is no collaboration, there is significantly less ability to access the best and brightest from all over the world. This, in turn, would deflate the ability of the U.S. to effectively remain competitive, and we would fall behind even more quickly.

Two features of the draft deserve credit. Guide 9 pilots the Trusted Research using Safeguards and Transparency (TRUST) framework in place of a blanket return-without-review for security concerns. Guide 14 makes clear that scholarly presentation, publication, and "participation in international conferences or other international exchanges ... that involve open and reciprocal exchange of scientific information" are not malign foreign talent recruitment. Those are the kind of precise, risk-based distinctions that protect the country without disarming its scientists.

We urge NSF to hold to that approach as it finalizes Guides 14 and 6 and encourage further refinements to the TRUST pilot – processes should be explained in specificity in the guidance, not only referenced as a concept. American leadership in science depends in no small part on the ability to attract the world's best people and to work across borders. Many of the scientists who built this country's scientific and defense strength started their careers outside the United States. Many of the scientists building the future of tomorrow were trained here in the United States. Requirements aimed squarely at genuine bad actors advance national security. Requirements broad enough to chill routine, transparent collaboration hand an advantage to strategic competitors and weaken the very security they claim to serve. FASEB also asks that new disclosure, documentation, and training requirements be proportionate and clearly written, so that compliance adds security rather than paperwork, and so that the load does not fall disproportionately on smaller institutions.

Recommendation. Keep the TRUST pilot and the Guide 14 protections for open scholarly exchange; provide additional needed specificity in the guidance, and transparency in any applications that result in loss of funding or status. Keep research-security requirements targeted at defined actors and activities. Confirm that fundamental research remains open and internationally collaborative, consistent with National Security Decision Directive 189 and with Executive Order 14303's own tenet that Gold Standard Science is "collaborative and interdisciplinary."

VIII. Guide 19 Should Confirm That Recipients' Statutory Civil-Rights and Disability Duties Still Apply

Guide 19 removes references tied to revoked executive orders and drops certain U.S. Department of Education cross-references. FASEB takes no position on the executive orders. We note only that the underlying statutes remain the law and remain listed in Guide 19's own authorities: Title VI of the Civil Rights Act, Title IX, Section 504 of the Rehabilitation Act, and the Age Discrimination Act. These protections also serve science. Research that studies human populations across the full range of American communities produces findings that keep all Americans healthy, servicemembers and veterans included. A research environment free of harassment is a precondition for conducting federally funded work safely and rigorously.

Our concern is technical in that removing familiar cross-references could lead some recipients to think obligations have been lifted when they have not. A short affirmative statement would prevent that confusion and the compliance disputes that follow from it.

Recommendation. Add a clear statement in Guide 19 that recipients' duties under Title VI, Title IX, Section 504, and the Age Discrimination Act, and their responsibility to maintain safe, harassment-free research environments, remain fully in effect regardless of the status of any executive order, and keep enough operational detail for recipients to comply.

IX. Definitions and Process Points Needing Clarity

- **Define the operative terms.** The GFA relies on words it never defines, among them “publication costs,” “national interest,” and the benchmarks for Gold Standard Science compliance. Recipients cannot comply with undefined standards, and NSF cannot apply them evenly. Define these terms in the text.
- **Fix the internal inconsistencies.** The publication-cost contradiction in Section III is the clearest case. A thorough review before finalization should confirm that the Summary of Changes and each Guide's operative text actually agree.
- **Count the burden.** Where the draft adds disclosure, documentation, certification, or pre-approval steps, the Paperwork Reduction Act burden estimate should reflect those new steps. A document meant to reduce burden should be measured against what it would require from recipients.
- **Allow for reasonable transition periods and, where warranted, further comment.** Given the scope of this restructuring and its dependence on the still-pending 2 CFR 200 rulemaking, NSF should provide clear effective-date and transition guidance. If it finalizes provisions materially different from those proposed, it should offer a further chance to comment.

X. Conclusion

FASEB strives for the same goals the NSF GFA draft includes as their targets: clarity, less burden, strong research security while retaining our ability to recruit the best and brightest, and rigorous, unbiased, merit-based science. We recognize the work behind the GFA, and appreciate the NSF providing the opportunity for comment. Every recommendation above is offered to help NSF reach the goals it has set, efficiency, value for the taxpayer, American competitiveness, national security, and Gold Standard Science, while avoiding provisions that, as written, would point the agency and science in the opposite direction. FASEB and its member societies would welcome the opportunity to share additional data and to work with NSF toward stronger final guidance, and we would be glad to facilitate engagement with the biological and biomedical sciences community it serves.

Respectfully submitted,

**Michael N. Lehman, PhD**

President, Federation of American Societies for Experimental Biology

cc: Darla P. Henderson, PhD, Executive Director & Chief Executive Officer, FASEB |
dhenderson@faseb.org | 301-634-7526