FASEB
FEDERATION OF AMERICAN SOCIETIES FOR EXPERIMENTAL BIOLOGY

REPRESENTING OVER 100,000 RESEARCHERS
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November 24, 2026

Submitted electronically via www.reginfo.gov

Suzanne H. Plimpton
Reports Clearance Officer
U.S. National Science Foundation
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Alexandria, VA 22314

Re: Comments of the Federation of American Societies for Experimental Biology (FASEB) on the Second Notice, NSF Guidance on Financial Assistance (GFA) (Version 27-1)
Docket No. NSF-2026-OTR-0001; OMB Control No. 3145-0058; ICR Reference No. 202610-3145-004
91 Fed. Reg. 67875 (Oct. 28, 2026); Comment Deadline: November 27, 2026

Dear Ms. Plimpton:

I. Introduction and Statement of Interest

FASEB welcomes the opportunity to comment on the second notice for the *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 are responsible for the meetings, journals, educational efforts, and merit-review networks that turn federally funded research into tangible public outcomes, and our members hold and administer NSF and other multi-year federal awards. FASEB submitted comments on the draft GFA (91 Fed. Reg. 38030) on August 22, 2026, and comments to the Office of Management and Budget on its proposed revisions to 2 CFR 200 (Docket No. OMB-2026-0034). We incorporate both submissions by reference.

FASEB specifically requested a second opportunity to comment given the scope of proposed changes, and we thank the NSF for carefully reviewing more than 3,000 comments received, for publishing a summary of and response to those comments, and for providing this additional opportunity to comment. The revised GFA moves substantially closer to the goals FASEB and NSF share: reduced administrative burden, value for the taxpayer, strong research security, and supporting the goals stated in Executive Order 14303, *Restoring Gold Standard Science* (May 23, 2025). Our remaining

recommendations are narrower. Most ask NSF to add clarifications it has already made in the operative text of each Guide, so that grant recipients, reviewers, and others can apply them consistently.

II. Appreciation to NSF for Addressing Specific Concerns

FASEB appreciates that the revised GFA responds directly to several concerns raised in our August comments. In particular, we thank NSF for:

- **[Summary of changes, overall]**. Removing language that aligned the GFA with the OMB's proposed, but not yet final, revisions to 2 CFR 200 and, as described in NSF's response to public comments, stating its intent to address any future Uniform Guidance-related changes only after final government-wide requirements are issued.
- **[Summary of changes, G12; G4.B6.3].** Removing the disallowance of publication costs, which resolves the contradiction with NSF's immediate public access requirement that FASEB identified, and listing publishing, journal costs, and page charges among the costs a proposal budget may request.
- **[G25.A; Summary of Changes, G25].** Removing "*changes in priorities"* as a stated ground for termination, along with removing the June draft's alignment of termination provisions with the proposed revisions to 2 CFR 200.
- **[G25.A.Procedure 1(a)].** Replacing *"in most instances, NSF will notify"* with *"NSF will notify"* so that written notice of noncompliance and an opportunity to correct any potential compliance concerns are now standard practice.
- **[G8.F.Procedure 1(a); G8.F.Term 1].** Reaffirming NSF's established merit review process; ensuring that funding recommendations are referred to the supervisory senior scientist, drawn from program leadership that have the authority to commit program funds; and tying the *"national interest*" to NSF's statutory mission in the definition of the award abstract.
- **[G11.D.Policy 1].** Identifying the factors NSF will consider before replacing a PI or co-PI, reducing funding, or suspending or terminating an award, including documented findings or administrative actions related to harassment or assault, the safety and security of personnel, and the continuity of funded research.
- **[G.1.Term 6, G12.C.Policy 11].** New protections preventing Program Directors from pressuring grant applicants to apply indirect cost rates below their negotiated rate and removing the language making indirect cost recovery subject to availability of funds. While this was not specifically called out in our August letter, it was addressed in our response to OMB cited.
- **[G14.A.Terms; G14.A.Policy 9**]. Adopting statutory definitions, retaining the protection for recipients to participate in international conferences and exchanges that involve the open and reciprocal exchange of scientific information, and tying the new restricted-entity prohibition to

specific named US Government lists. These are targeted, defined measures that FASEB urged in our August comments.

- **[Summary of Changes, G19]**. Stating that removing civil-rights discussion from the GFA does not affect recipients' independent statutory obligations.
- **[Overall].** Reducing administrative burden in several places, consistent with the goal FASEB strongly supported in our August comments.

III. Remaining Recommendations

FASEB respectfully offers the following recommendations, in order of priority. Each addresses an issue raised in our August comments that the revised GFA does not yet fully resolve.

A. **Terminations and Appeals [G25.A.Policy 1], [G25.A.Procedure 1(a)], [G25.A.Procedure 1(e)], [G26.B.Procedure 1(d)-(e)].** FASEB appreciates that the revised Guide 25 no longer lists *"changes in priorities"* as a ground for termination and now requires written notice before NSF acts on compliance concerns. Three issues from our August comments remain a need. First, Guide 25 authorizes termination *"for cause"* pursuant to 2 CFR 200.339 and 2CFR 200.340 without specifying which versions of those sections applies. The current 2 CFR 200.340 (a)(4) already permits termination by the agency when an award no longer effectuates program goals or agency priorities, provided that the awards terms and conditions say so. Removing the phrase from Guide 25 does not remove the authority. Because the cross-referencing does not specify a version, a final OMB revision to 2 CFR 200.340 would also apply to NSF awards without NSF's own specified notice and comment period, thus placing this at odds with NSF's decision to wait for final government-wide OMB requirements. Second, NSF retains authority to "*immediately suspend or terminate"* an award to protect the interest of the government, in which case there is no notice of noncompliance or correct action plan issued, and *"interest of the government"* remains undefined. Third, although reviewers of a termination appeal would not include NSF staff involved in any disputed decision, the Chief Science Officer still issues the agency's final, unappealable decision. As we noted in our August comments, a research award is the foundation on which any institution hires staff, admits and trains students, and in some cases, enrolls human research participants. Ending any meritorious research grant midstream without safeguards would spend the taxpayer's investment unwisely, with no finished science output. It further increases the risk to grant recipients, disadvantaging both early career researchers establishing their work and smaller or lesser resourced institutions.

FASEB recommends that NSF:

- Specify the version of 2 CFR 200 that NSF awards incorporate (for example, the version in effect on the GFA's effective date), or alternatively, commit to a notice and comment period before any amendment to 2 CFR 200.339-200.343 would apply to NSF awards;
- State any priorities-based termination ground in the award's terms and conditions at the outset, and limit such uses to rare cases in order to wisely invest taxpayer resources;
- Define the *"interests of the government"* and limit any immediate suspension or termination without notice to documented emergencies, such as threats to safety, fraud, or national security;
- Before terminating a multi-year award for reasons other than cause, document consideration of the sunk federal investment, the reliance interests of the institution and its trainees, and less disruptive alternatives, such as modification or no-cost extension; and
- Preserve a meaningful right of appeal for grant recipients and their institutions, with a final decision made by an official outside the chain that made the termination decision, as FASEB recommended in August.

B. Publication and Dissemination Costs [G4.B6.3] [G21.C.Policy 1.a-b] [G12.A.Procedure 2(c)]. FASEB thanks NSF for removing the disallowance of publication costs. Guide 4 now states that a budget may request funds for "*journal costs (except costs for prior or early publication), page charges, and illustrations* [G4.B6.3]], and Guide 12 continues to permit charging allowable publication costs before closeout [G12.A.Procedure 2(c)]. Here, two points still need attention. First, Guide 21 no longer includes the June draft's statement that deposit fees *"are still allowable expenses on NSF awards"*. Instead, the Guide states that depositing the author's accepted manuscript in NSF's Public Access Repository *"does not require payment of special fees to publishers*" to make versions of record publicly accessible [G21.C.Policy 1.a). In the context of the reasonable and necessary test, this sentence could lead reviewers to question open access article publishing costs, even though Guide 4 lists journal costs as allowable. While the NSF does not require payment, the reality on the ground is that there are costs: high-quality, unbiased peer review, research integrity assessments, broad dissemination, and other elements that align with Gold Standard Science have real costs. We addressed the complexity of the environment in our response to the National Institutes of Health in 2025 and stand ready to share more insight with NSF to support adjustments here in language. Second, *"publication costs"*, which FASEB asked NSF to define, remains undefined, and the new exception for prior or early publication is not defined either. Without definitions, recipients could be confused regarding whether the exception reaches other common charges.

In addition, the revised Guide 21 requires that datasets underlying peer-reviewed publications be made publicly available by the time of publication [G21.C.Policy 1.b], and doing so brings costs for curation and deposit that we believe must remain allowable expenses. As we stated in August, publications and data costs are overall a very small share of a grant, yet they are the path by which the taxpayer's investment can be validated, shared, and preserved as a permanent record.

FASEB recommends that NSF:

- Confirm in Guide 4 or Guide 12 that open-access article publishing charges, page and color charges, and data deposit and curation fees are allowable *"journal costs"* or "*dissemination costs"*, subject to usual reasonableness measures;
- Restore the June draft's statement in Guide 21 that deposit fees remain allowable expenses on NSF awards;
- Define *"publication costs"* and "*prior or early publication"*;
- Commit to notice and comment before any future changes to the allowability of publication costs, including any change that would follow a final OMB rule.

C. Protecting Merit Review [G8.F.Procedure 1(a)-(c)] [G11.D.Policy 1]. FASEB appreciates NSF's reaffirming its merit review process. Under the revised Guide 8, the Program Director would recommend or decline awards to the appropriate supervisory senior scientist, and the Grants Officer would then conduct business, financial, policy, and risk-based review before an award is issued [G8.F.Procedure 1 (a), (c)]. The revised Guide 11 also now identifies the factors that NSF would consider before replacing a PI or co-PI, reducing funding, or suspending or terminating an award [G11.D.Policy 1]. These are welcome changes as noted earlier. However, the GFA continues to align NSF policy with Executive Order 14332, Improving Oversight of Federal Grantmaking [Summary of Changes, Overall], and neither Guide states what leadership or risk review may or may not determine. FASEB's August recommendation was narrow, and it remains so. Agency leadership has a legitimate stewardship role, but that role should not displace the unbiased, expert merit review that we believe is the foundation of success for the American research enterprise, and that *Executive Order 14303* also identifies as a tenet of Gold Standard Science.

FASEB recommends a modest but meaningful addition:

State in Guide 8 that leadership and risk review confirm statutory eligibility, compliance, and documented integrity or research security concerns, and do not displace the scientific or expert judgement provided in merit review. Limit pre-award risk assessment to objective, documented factors, and identify the criteria applied by reference to the Prospective New Awardee Guide. In Guide 11, we also encourage clarification that NSF exercises its stewardship authority on the basis of documented findings and the listed factors, after consultation with the grant recipient.

D. **Research Security: Specificity for TRUST and New Life Sciences Categories [Summary of Changes, G9] [G14.A.Terms 7-8 and Policy 3] [G14.A.Policy 9] [G6] [G20].** We welcome the retention of the TRUST pilot and of the Guide 14 protection for open and reciprocal international exchange. This is crucial to the functioning of a scholarly scientific environment. In our August comments, we asked that the TRUST process be *"explained in specificity in the guidance, not only referenced as a concept."* That request remains open: TRUST continues to appear only in the Summary of Changes, and Guide 9 does not describe it. The revised GFA also adds a category of *"International Life Sciences Research of Concern"* (IROC), which includes life sciences research *"conducted in a country with inadequate oversight"* [G14.A.Terms 7-8; G6, G20]. The phrase *"inadequate oversight*" is not defined, and no Guide language specifies what follows from designation as IROC. In addition, Authorized Organizational Representatives (AORs) and senior or key personnel must now certify compliance with the restricted-entity prohibition at the time of proposal submission [Guide 14.A.Policy 9] and NSF reserves the right to perform analytical risk assessments of proposals and awards [G14.A.Policy 3]. Such undefined categories with unstated consequences risk chilling the routine and transparent international collaboration that keeps American science competitive and allows U.S. institutions to recruit and retain the best and brightest. Again, that burden falls most heavy on early career researchers and smaller or lesser-resourced institutions.

FASEB recommends that NSF describe the TRUST process in Guide 9. An effective description could include the triggers, steps, timelines, mitigation options, and how a grantee might respond. We also ask NSF to define *"inadequate oversight"*, to state the consequences of an IROC designation, and provide notice and with an opportunity to respond before such designation impacts a proposal or award. Consistent with our August comments, NSF should also provide transparency and a path for review where research security findings might lead to a loss of funding or eligibility, and should keep new disclosure, certifications, and training requirements proportionate, clearly written, and reflected in the estimate of burden.

E. **Civil Rights: Add the Specific Assurance in Guide 19 [G19] [Summary of Changes, G19].** FASEB thanks NSF for stating in the Summary of Changes that the Section 504, Title IX, and age-discrimination obligations remain "*independently applicable without discussion in the GFA"* and that removing that discussion "does not affect their applicability to recipients". That statement does not appear in Guide 19 itself. The revised Guide 19 focuses on filing complaints with the NSF Office of Civil Rights and no longer includes the June's draft statement that recipients are responsible for investigating complaints and ensuring compliance with applicable civil rights laws. Title VI, Section 504, Title IX, the Age Discrimination Act, and NSF's implementation regulations are listed as the authorities. This matters because recipients and auditors work from the operative text, not the Summary of Changes, and the clarification FASEB requested in our August response may be lost to applicants once the GFA is final. This is also an example of the

consistency between the Summary of Changes and the Guides that FASEB encouraged that NSF confirm in our earlier comments.

FASEB recommends that NSF take the following considerations.

Move the Summary of Changes statement directly into the body of Guide 19, covering Title VI, Title IX, Section 504, and the Age Discrimination Act, and add affirmative language that a recipient's responsibility is to maintain safe, harassment free research environments, with enough operational detail provided so that recipients may readily comply.

F. **Scientific Meetings and Conference Travel [G4.B4.Policy 2] [G7.G.Policy 1] [G12.A.Procedure 3].** The language describing travel and conferences in Guide 4 and 7 is unchanged from the June draft and the PAPPG. FASEB appreciates that NSF did not add restrictions. Our earlier concern was not with this language, but with any downstream practices, including in the separately provided prior approval matrix that NSF references in Guide 12, that would treat ordinary scientific meeting or conference attendance as suspect, or would require case-by-case pre-approval in each award. Scientific meetings and conferences are where results are tested, methods are challenged, collaborations begin, and the next generation of scientists are recruited and trained. Again, restrictions would fall hardest on early career researchers and smaller or lesser-resourced institutions. Additional requirements, such as the approval matrix or process for pre-approval, would add to the administrative burden without providing corresponding value to the taxpayer.

   We respectfully request that NSF confirm that the prior approval matrix will not require case-by-case approval for scientific meetings or conferences travel reasonably necessary to the funded work, consistent with the longstanding practice and presumption that such travel is allowable, subject to reasonableness rules and the NSF economy travel policy.

G. **Definitions, Effective Date, and Burden [Overall] G25.B.Term 1] [G1].** In our August comments, FASEB asked NSF to define the operative terms the GFA relies on, including "*publication costs," "national interest"* to NSF's statutory mission in the definition of the award abstract [G8.F.Term 1], "*publications costs"* remains undefined (see above). Guide 13 restates the tenets of Gold Standard Science and references applicants to NSF's Gold Standard Science Implementation Plan but does not explain how adherence will be assessed during review or award management or reporting [G13.D]. The revised definition of research misconduct now includes "*super intelligence (SI)-based tools,*" a term that the GFA does not define [G25.B.Term 1], and in an environment where artificial intelligence is itself being heavily funded and strongly encouraged to be used in other government-wide efforts, this adds to the confusion. Finally, every Guide still lists its effective date as [Month Day, Year], although NSF has indicated that the GFA will take effect in early 2027. Recipients and institutions cannot comply with undefined terms or plan for an unknown implementation date.

FASEB seeks greater clarity. We encourage the NSF to define super intelligence (SI) based tools and clarify whether routine AI-assisted searching, writing/organizing, coding, and analysis tools are covered. These are commonly adopted tools. Similarly, many government-wide grants and programs now emerging are geared towards developing SI tools, and clarity is required on this front. We also encourage that the agency publishes the effective date with at least 90 days lead time for researchers, and to confirm that the new guide applies only to proposals due and awards or increments made on or after that date. Finally, consistent with our August request to count the burden, we encourage NSF to update its Paperwork Reduction Act burden estimate to reflect the new certification, disclosure, training, and data availability requirements in the revised GFA, including restricted-entity certification [G14.A.Policy 9], expanded research security and responsible conduct of research training [G13;G14], Vertebrate Animals Plan [G6], and data availability at publication [G21.C.Policy 1.b].

H. **Specific Request for Future GFA Changes Implementing OMB Revisions.** We respectfully request that NSF commit that any change to the GFA implementing a final revision to the Uniform Guidance will be published for its own public notice and comment before it takes effect. This request follows from our August recommendation and would give weight to NSF's decision to wait for final government-wide requirements. Other organizations have raised the same request.

IV. Conclusions

FASEB recognizes the work NSF staff have put into the GFA and appreciates an opportunity to comment on this revised version. We thank NSF for considering our earlier comments and for incorporating many of the changes we requested. We offer these remaining recommendations in the same spirit, to help NSF reach the goals it has laid out: maximizing efficiency and value for the taxpayer, driving American competitiveness, ensuring national security, and upholding Gold Standard Science. FASEB and its member societies would welcome the opportunity to share additional data and work with NSF toward stronger final guidance, and we would be glad to facilitate engagement with the biological and biomedical sciences community.

Respectfully submitted,



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