



February 4, 2025

Suzanne H. Plimpton
Reports Clearance Officer
National Science Foundation
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 December 12, 2024. We applaud NSF's efforts to clearly communicate proposed changes and the 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 the continued implementation of the CHIPS and Science Act of 2022 and the National Security Presidential Memorandum 33 (NSPM-33) and updates to 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), the U.S. Government Policy for Oversight of Dual Use Research of Concern and Pathogens with Enhanced Pandemic Potential, and NSF's public access policy. Regarding the updates to the public access policy, FASEB particularly appreciated the inclusion of updated guidance on the development of the Data Management and Sharing Plan on pages 70 – 71.

As an organization committed to improving the inclusivity of scientific research activities, FASEB particularly appreciated revisions intended to enhance accessibility of NSF processes among individuals with disabilities, including the preamble of Part I: Proposal Preparation and Submission Guidelines (page 25) and the requirement to include descriptive alternative text for all images, graphs, and charts and use of machine readable/accessible electronic formats when developing proposals (page 40). Similarly, the proposed language to include medical leave of a senior/key person (or immediate family member) as eligible for an extension of a proposal deadline is aligned with FASEB's efforts to support caregivers among STEM professionals.

FASEB also appreciated two updates related to fostering the next generation of researchers. First, we wholeheartedly support the expansion of the mentoring plan requirement to include graduate students receiving stipend support. Similarly, the language highlighting the Education and Training Application (ETAP) increases awareness of this resource aims assist individuals interested in expanding their training in STEM fields with identifying and applying for NSF-funded professional development opportunities. Such resources are critical to ensure continued growth and retention of individuals interested in pursuing

STEM careers. In addition to this proposed language, FASEB encourages NSF to consider additional outreach strategies to increase awareness of the ETAP among research institutions and scientific societies.

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,

A handwritten signature in black ink that reads "Beth A. Garvy". The signature is written in a cursive style with a large, looping "G" at the end.

Beth A. Garvy, PhD
FASEB President