

August 21, 2026

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National Science Foundation
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Submitted electronically via www.regulations.gov

Re: Comments of the American Institute of Biological Sciences on the Draft NSF Guidance on Financial Assistance; (Docket No. NSF-2026-OTR-0001; Information Collection 3145-0058), 91 Fed. Reg. 38030 (June 24, 2026)

Dear Ms. Plimpton:

The American Institute of Biological Sciences (AIBS) submits these comments on the draft NSF Guidance on Financial Assistance (GFA), which would replace the NSF Proposal and Award Policies and Procedures Guide (PAPPG, version 24-1). AIBS is a nonprofit scientific association dedicated to promoting informed decision-making that advances biological research and education. Our members—scientific societies, research institutions, natural history museums, botanic gardens, biological field stations, and universities—prepare and manage a substantial share of the more than 43,000 proposals NSF receives annually.

AIBS supports NSF's intent to organize the guidance by topic, write in plain language, distinguish policy from procedure, and remove obsolete content—these are genuine improvements that should make the guidance easier to use and reduce the time recipients spend interpreting it. Our primary concern is with the decision to align the draft with the Office of Management and Budget (OMB)'s proposed revisions to 2 CFR Part 200, a rule that is not final. That choice carries several of the proposal's most consequential features into NSF policy before the public comment on it has been considered. Consistent with NSF's instruction, each comment below begins with the guide and section it addresses in brackets.

1. The draft should not pre-apply a rule that is not final.

[General; G1; G3.C; G12; G25.A]

The Summary of Changes states that a principal purpose of the GFA is "[a]ligning with the proposed revisions to the Office of Management and Budget's (OMB) Uniform Guidance at 2 CFR 200 through the proposed rule published on May 29, 2026." At least four changes are expressly tied to that proposal: removal of fixed-price award references (Guide 1), a new disclosure requirement concerning former NSF staff (G3.C), the statement that publication costs are disallowed (Guide 12), and the alignment of termination provisions (Guide 25).

That rule is a proposal. Its comment period closed on July 13, 2026, and OMB has not issued a final rule. Writing NSF policy to match it now presupposes the outcome of a rulemaking still underway, obliges recipients to comply with requirements derived from text that may be revised or withdrawn, and would require NSF to revise the affected sections again once the OMB rule is resolved.

Two features of that approach compound the problem. The draft does not identify, provision by provision, how the proposed rule has been incorporated, so a reader cannot decipher which requirements reflect NSF's current policy, which are drawn from the rule as proposed, and which would change if the rule changes. And "alignment" is nowhere defined: as a statement of intent it is broad enough to describe anything from adopting a handful of discrete provisions to reorganizing NSF practice around the rule as a whole, and the draft leaves that scope open to interpretation. The public is therefore asked to comment on a document whose relationship to a pending rulemaking is itself unstated. AIBS urges NSF to withhold every provision that depends on the proposed rule, to retain current policy in the interim, and—if and when OMB issues a final rule—to re-propose the affected sections for comment reflecting the rule as adopted.

2. Political approval must not override scientific merit review.

[G8; G8.F]

Independent expert review is the foundation of NSF's record and of public confidence in it. How far proposed 2 CFR 200.205 would reach into NSF's procedures is unclear—Guide 8 does not mention it, and the Summary of Changes reports no significant changes to that guide. But if applied as written, it would condition each discretionary award on a senior appointee's confirmation that the award advances the President's policy priorities and the national interest, standards the proposal does not define. That would subordinate scientific merit to criteria that change with each administration, and the effect would reach beyond the awards actually blocked, since researchers who anticipate a political screen adjust what they propose. NSF also presently has no Senate-confirmed Director or Deputy Director; both positions are vacant, and the agency is led by an official performing the duties of the Director. AIBS asks NSF to state whether and how it intends to apply § 200.205 if the rule is finalized, which official would perform the review, on what standard, whether the authority may be redelegated, and whether the senior-program-staff review in G8.F is meant to satisfy it.

Two features of G8.F warrant attention in any event. First, PAPPG 24-1 identified the internal review step by office: the Program Officer "recommends to the cognizant NSF Division Director," with "final programmatic approval ... at the Division/Office level." G8.F replaces that with two undefined roles—a "supervisory senior scientist" and "[s]enior program staff," who "review recommendations before they move to grants management for pre-award review and processing." The step is carried forward, but the accountability for it is no longer stated, and NSF should identify these officials and the standard applied at each stage. Second, G8.F retains PAPPG's definition of the Award Abstract as a document that "justifies the expenditure

of federal funds by articulating how the project serves the national interest," but drops the language that informed readers what that term meant. PAPPG tied the national interest to "NSF's mission: 'to promote the progress of science; to advance the national health, prosperity and welfare; or to secure the national defense.'" That mission language, from the National Science Foundation Act of 1950, survives at G1.A, but its link to the term that governs award abstracts is gone. AIBS urges NSF to restore the qualifier and to confirm that no step in G8.F displaces merit review under the two criteria in G8.B, which Guide 8's Authorities section identifies as the National Science Board's.

3. Termination standards should be stated in the guide, not left to change with the OMB rule. [G25.A; G11.D]

Under PAPPG 24-1, the grounds for suspension and termination appeared in the guide itself, in a list of six—among them "[b]y NSF, to the greatest extent authorized by law, if an award no longer effectuates the program goals or agency priorities." A priorities-based termination is therefore not new to NSF policy, and PAPPG did not characterize it as "cause": it stood alongside noncompliance and research misconduct as one enumerated basis. G25.A departs from that structure in three respects. It replaces the enumeration with a cross-reference to 2 CFR 200.339 and 200.340, so the governing standard no longer appears in the guide recipients read. It gathers the grounds under a single heading of termination "for cause," which obscures the difference between noncompliance and a change in priorities. And it refers to "changes in priorities" without identifying whose: PAPPG and current § 200.340(a)(4) both specify agency priorities, while the proposed rule speaks of administration policies and priorities and of the President's policy priorities. That omission matters because G25.A cites § 200.340 as it may later be amended rather than as it reads today, so any change the OMB rule makes to that section—including to the grounds for termination and to whether a recipient may contest one—would take effect in NSF policy without NSF proposing it.

The stakes are concrete for biology, which runs on time horizons that span administrations. A long-term ecological time series interrupted partway becomes a permanent gap in the record; a cohort study halted midstream cannot recover the elapsed time; teams dissolve and trainees lose projects mid-degree. Terminating work already underway for reasons unrelated to its quality forfeits an investment the public has already made.

AIBS therefore urges NSF to restore the enumerated grounds to G25.A, to state expressly that "priorities" means agency priorities, and to cite the regulatory text as of a fixed date rather than adopting future amendments by reference. A related gap appears in G11.D, which provides that "After NSF consults with the AOR or designee, NSF may, if necessary, initiate the substitution or removal of the PI or any co-PI, reduce the award funding amount, or suspend or terminate the award." The provision states no criteria for when such action is "necessary," no timeline for the consultation, no requirement that the affected PI be informed, and no route to review. AIBS asks NSF to supply each.

4. The draft is internally inconsistent on publication costs.

[Summary of Changes (G12); G12.A; G12.E; G4.B; G21.B]

The Summary of Changes states that Guide 12 "[d]isallows publication costs consistent with proposed revisions to 2 CFR 200." Nothing in the draft carries that through, and three provisions assume the opposite. Guide 12 contains no such prohibition—its only prohibitions section, G12.E, covers telecommunications equipment and unmanned aircraft—and G12.A's post-end-date timing rule presupposes allowability, permitting recipients to charge "allowable publication or research results sharing costs before closeout as permitted." G4.B lists "[r]eports, reprints, page charges and illustrations" and "[d]ata deposit and curation costs" among allowable costs. And G21.B states that Public Access Repository deposits "do not require the payment of any third-party fees, but those fees are still allowable expenses on NSF awards."

The guide text is therefore consistent—publication and data deposit costs are allowable—but the Summary of Changes says the opposite, and the summary is what commenters and institutions read first. Across roughly 3,000 recipient organizations, that mismatch will produce inconsistent budgeting for page charges, article processing charges, and data deposit fees, and disputes at closeout.

The stakes are not only administrative. G21.B removes the 12-month publication delay and requires deposit of authors' accepted manuscripts at or before publication, with underlying datasets publicly available by that time. NSF cannot require immediate public access while leaving in doubt whether the costs of achieving it may be charged to the award, and no estimate of those costs appears in the burden analysis. AIBS urges NSF to strike the contrary statement from the Summary of Changes and to state affirmatively in Guide 12 that publication and data deposit costs, including fees necessary to satisfy federal public-access requirements, are allowable.

5. Research-security requirements should be targeted and their burden reflected in the estimate.

[G14.A; G13.D; General]

AIBS supports targeted, risk-based management of genuine research-security risks, and the draft's approach to disclosure and training is largely workable. Our concern is with what the GFA does not say. Proposed 2 CFR 200.220 would prohibit a broad class of foreign collaborations, and proposed § 200.202 would require an affirmative national-interest justification for any international element of an award. Neither appears in the draft, even though the GFA is elsewhere written to align with that proposed rule. AIBS asks NSF to confirm that it will not implement those provisions except through guidance offered for public comment. International collaboration is not peripheral to biology: biodiversity research, disease surveillance, and climate science depend on partnerships and field sites that

cross borders, and "collaborative and interdisciplinary" is among the nine characteristics of Gold Standard Science that Executive Order 14303 lists and G13.D adopts.

A requirement announced after this notice published compounds the concern. On July 8, 2026, NSF issued a Dear Colleague Letter, Prohibition on Collaborations with Restricted Entities (NSF 26-022), which NSF intends to implement in Fiscal Year 2027 "along with the effective date of the Draft Guidance on Financial Assistance ... or the effective date of Acquisition Policy issued by the Senior Procurement Executive." It would bar senior and key personnel from collaborating on NSF-funded research with any entity on twelve federal restricted-party lists, and—without that limitation—from holding an appointment or position with, or receiving research support from, such an entity for the duration of an NSF award. Authorized Organizational Representatives and senior and key personnel would certify compliance at proposal submission, and organizations would be responsible for identifying and addressing prohibited activities before funds are expended.

That is a new information collection—a certification by the AOR and by every senior or key person on every proposal—together with a new institutional screening obligation. It appears nowhere in the draft GFA and nowhere in the 120-hour estimate, yet NSF proposes to bring it into effect on or about the same date as this guidance. Screening every senior and key person, and their outside appointments and research support, against twelve lists maintained by seven agencies is not a trivial exercise, and it will fall hardest on institutions without a research-security office. AIBS asks NSF to incorporate the requirement into the GFA text so that it can be reviewed, to estimate the screening and certification burden, and to include that burden in the submission to OMB.

6. The burden estimate does not reflect what the draft adds.

[General — items (b), (c), and (d) of the notice]

The notice estimates an average of 120 hours per proposal and 5,160,000 total burden hours annually. Neither figure can be reconciled with what the draft adds. A single per-proposal average, offered without any breakdown, cannot show where NSF has accounted for the organizational duty to screen for and disclose former NSF employees (G3.C), the revised Data Management and Sharing Plan requirements (G5.H), the public-access obligations in G21.B, or the certification and screening announced in the July 8 Dear Colleague Letter. The draft also replaces two lower-burden pathways with costlier ones: accomplishment-based renewals allowed a short summary and a set of reprints in place of a full Project Description, and recipients are now directed to the ordinary renewal process; Special Creativity Extensions were initiated by an NSF program officer, and recipients are directed instead to no-cost extensions and supplements they must request and justify themselves.

Independent evidence indicates that 120 hours understates the administrative load before any of these additions. In the Federal Demonstration Partnership's 2018 Faculty Workload Survey, 11,167 principal investigators with active federal awards estimated that 44.3 percent of their

federally funded research time went to administrative and related requirements rather than research, up from 42.3 percent in 2005 and 2012. The figures are self-reported, but the level is striking and the direction has not reversed in thirteen years. The Council on Government Relations, which tracks changes in federal research requirements since 1991, documents 270 new or significantly modified requirements between 1991 and 2024, 62 percent of them in the past decade. AIBS urges NSF to publish a re-estimate that is disaggregated by proposal type and that identifies, requirement by requirement, the hours attributed to each obligation the draft adds, together with the assumptions behind them, before seeking OMB clearance.

7. The draft GFA should be consistent throughout and citable on its own.

[Summary of Changes; G9.B; G2.A; G3.C; G14.A; G12.C; General]

Commenters and institutions rely on the Summary of Changes to know what has changed, and in several places it does not match the guide text. The Summary states that Guide 9 "pilots the Trusted Research Using Safeguards and Transparency (TRUST) framework" in place of returning proposals without review on research-security grounds, yet "TRUST" appears nowhere else in the 203-page draft and G9.B contains no TRUST criteria, no process, and no opportunity for a proposer to respond. The Summary refers to a "Broad Program Solicitation" where G2.A uses "Broad Topic Solicitations." The Summary describes the former-NSF-staff provision as an obligation of "former NSF staff or IPAs," while G3.C places it on the organization—" [a] recipient or subrecipient must disclose whether any employees" worked on the proposal and were employed at NSF in the preceding two years—and does not mention IPAs at all.

A second, structural problem runs through the guides themselves. The Federal Register notice describes the GFA as a document that "directs users to originating statutes, guidance, and regulations, where practicable," and the draft carries that design far: it refers readers to NSF.gov in twenty-three places and to Research.gov in more than a hundred. Many of those references are properly procedural. But a citation to codified regulation and a citation to a webpage are not equivalent. 2 CFR Part 200 cannot change without notice and comment, and a reader can always retrieve the text in force on a given date; a webpage carries no version, no effective date, and no obligation to announce a revision. In several places, the draft nonetheless inserts operative content on one. G14.A provides that "[t]he full definition of a malign foreign talent recruitment program can be found on NSF.gov"—a definition that determines whether an individual may serve as senior or key personnel at all. G12.C directs recipients to an indirect cost rate submission page that the draft itself marks "(to be updated)." Guide 4 locates the list of programs requiring cost sharing on a policy page rather than in the guidance. The consequence for this clearance is direct: OMB is asked to approve a collection whose operative terms are held partly outside the document and can be revised without notice or record.

None of these is merely editorial. An institution cannot build a compliance process around a framework that is announced but not written, determine who owes a disclosure when the

summary and the guide assign the obligation to different parties, or rely on a requirement that can be rewritten on a webpage. AIBS urges NSF to reconcile each discrepancy in the final GFA; to state substantive requirements and definitions in the text of the guides, reserving links for supplementary or administrative material; and to publish a PAPPG-to-GFA crosswalk and a redline, alongside a consolidated, searchable version of the guidance, so that reviewers can verify what has changed rather than reconstruct it.

8. It is unclear which implementation guidance and requirements now apply to Dangerous Gain of Function research.

[G6.E; G20.D; Summary of Changes (G6, G20)]

Guide 6, Section E and Guide 20, Section D replace NSF's implementation of the U.S. Government Policy for Oversight of Dual Use Research of Concern and Pathogens with Enhanced Pandemic Potential with the statement that "NSF will follow implementing guidance and requirements set forth by Executive Order 14292," and they instruct proposers to "[s]creen projects for dangerous gain of function by first reviewing EO 14292." The draft thus withdraws the policy that supplied the operative standard and substitutes a reference to an executive order.

That implementing guidance now exists. On July 28, 2026 —after this draft was published and while the comment period was open —the Administration released the U.S. Government Policy for Stopping High-Risk Life Sciences Research pursuant to Section 4 of EO 14292. That policy, not the executive order, supplies the operative definitions and prohibitions. It adds a second category the draft does not mention, International Research of Concern; it leaves the existing suspension of federally funded dangerous gain-of-function work in place until agencies act; and it directs agencies to publish implementation guidance within 120 days, a deadline that for NSF falls after the GFA is expected to take effect.

A proposer reading Guide 6 or Guide 20 today, therefore, cannot determine which standard governs, whether the definition in the draft is coextensive with the definition in the government-wide policy, or how NSF will treat the international research the new policy addresses. AIBS urges NSF to state the operative requirements in the guides themselves, to cite the July 2026 policy, to address International Research of Concern, and to provide an opportunity for public comment on these sections once NSF's implementation guidance is issued.

Conclusion

AIBS appreciates the work NSF has put into making this guidance clearer. We urge NSF to revise the draft so that it states plainly what is changing, and to withhold any provision that pre-applies OMB's proposed revisions to 2 CFR Part 200. Guidance that assumes the outcome of that rulemaking would treat the public comment now before OMB as a formality, and would carry into NSF's own policies the features of that proposal most damaging to American science—political review in place of scientific merit, awards that can end when priorities

shift, and new limits on how findings are shared. We welcome the chance to work with NSF as this guidance is finalized.

Respectfully submitted,



Scott Glisson
Chief Executive Officer
American Institute of Biological Sciences

cc: Mr. Brian Stone, Chief of Staff, Performing the Duties of the Director, U.S. National Science Foundation