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U.S. National Science Foundation
Randolph Building, 401 Dulany Street
Alexandria, VA 22314

RE: University of California System Comments on Draft NSF Guidance on Financial Assistance, Information Collection No. 3145-0058, Docket ID No. NSF-2026-OTR-0001

Dear National Science Foundation:

On behalf of the University of California system (UC), we submit these comments on the U.S. National Science Foundation's (NSF) draft [Guidance on Financial Assistance \(GFA\)](#), which would replace the current Proposal and Award Policies and Procedures Guide (PAPPG).

UC is the nation's leading public research university system, comprised of ten campuses, six academic health centers, and UC Agriculture and Natural Resources. Since its founding as California's land-grant university in 1868, UC has partnered with the federal government to advance a shared public mission: educating students, advancing knowledge, strengthening agriculture and industry, and serving the Nation. This longstanding federal partnership has produced measurable national benefits by translating taxpayer investment into workforce training, patient care, and advances in health, national security, energy, agriculture, technology, and economic growth.

UC educates nearly 300,000 students, employs more than 260,000 faculty and staff, conducts over \$7 billion in annual research, ranks first in the world for patented inventions from federally supported research, and has been home to more than 70 Nobel laureates. UC is also one of NSF's major university partners. According to UC administrative data current as of July 10, 2026, during federal fiscal years 2021 through 2025, UC submitted 13,093 proposals to NSF and received 6,034 NSF awards totaling approximately \$2.79 billion. In federal fiscal year 2025 alone, UC submitted 2,742 proposals and received 994 awards totaling approximately \$560.2 million. Across UC, NSF awards support fundamental and use-inspired research, graduate and early-career development, research infrastructure, interdisciplinary collaboration, field and data-intensive science, STEM education, and the translation of discoveries into public benefit. The scale and breadth of this partnership give UC a substantial interest in ensuring that NSF's proposal and award policies remain clear, stable, merit-based, and workable.

The National Science Foundation Act of 1950 states that NSF's mission is "to promote the progress of science; to advance the national health, prosperity, and welfare; [and] to secure the national defense."¹ That mission closely aligns with UC's public mission of teaching, research, and public service. NSF's success has long depended on rigorous expert merit review, sustained investment in fundamental and use-inspired research, development of the STEM workforce, collaboration across institutions and disciplines, and responsible stewardship of public funds. The draft GFA is not merely an administrative manual. It would establish the practical rules by which ideas enter merit review, researchers and institutions collaborate, students and research infrastructure are supported, compliance obligations are administered, research results are shared, and multi-year awards are carried out.

The draft GFA, however, goes beyond reorganizing and clarifying the PAPPG. It combines changes in structure and presentation with material revisions affecting merit review, international participation, research security, cost allowability, public access, award administration, suspension, termination, and appeals. Because these changes may alter recipient obligations and require significant institutional implementation, they warrant clear standards, complete operative text, and focused stakeholder review.

The proposed changes would have consequences beyond research administration. NSF awards often support multi-year scientific programs, graduate students, postdoctoral scholars, early-career investigators, shared facilities, long-term field observations, complex collaborations, and research whose value depends on continuity. Policies that make funding decisions less transparent, approved collaborations more difficult to sustain, reasonable research costs harder to recover, or active awards more vulnerable to changing priorities would reduce the stability and predictability on which successful research depends. They also would risk undermining NSF's mission by delaying discovery, discouraging participation in federally supported research, and diverting scientific and institutional resources from research to administration.

In preparing these comments, UC reviewed the draft GFA and compared it with the currently applicable [NSF PAPPG 24-1, as modified by Supplements 1 and 2](#). Consistent with NSF's notice, UC's comments address the practical utility and clarity of the proposed collection, the accuracy and completeness of NSF's burden estimate, opportunities to minimize burden through technology and design, and the usability of the new guide structure. UC also comments on selected new requirements, revisions to existing policies, and provisions in the current PAPPG that the draft GFA would remove or no longer state clearly.

UC urges NSF not to finalize or issue the draft GFA in its current form.

The draft requires substantial revision before implementation. At a minimum, NSF should remove or defer provisions that depend on unresolved OMB rulemaking. If NSF proceeds with replacing the PAPPG, it should address the concerns identified below before implementation. UC's comments focus on the proposed changes with the greatest implications for NSF-supported research and award administration, including OMB-dependent provisions and version control; merit review and award selection; international participation, research security, and institutional certifications; publication, data management, and public access; indirect-cost protections and award flexibility; property and research materials; suspension, termination, and appeals; and administrative burden and implementation.

UC does not address every proposed change, and the absence of comment should not be interpreted as agreement. For each issue addressed, UC identifies the relevant GFA provision and recommends a clearer and more workable alternative that protects both public funds and the public benefits they are intended to produce.

¹ National Science Foundation Act of 1950, Pub. L. No. 81-507, 64 Stat. 149 (1950).

Detailed Comments on Selected Material GFA Provisions

[Summary of Changes; G1.B; G10.A.Policy 3] Premature and contingent adoption of proposed OMB provisions

The GFA expressly states that it is aligning NSF policy with OMB's proposed revisions to 2 CFR Part 200. The Summary of Changes states that the GFA removes references to “fixed-price awards” to align with proposed revisions to 2 CFR Part 200. Because the current PAPPG and Uniform Guidance use the term “fixed amount awards,” the draft creates uncertainty as to whether NSF intends to eliminate fixed amount awards and fixed amount subawards. The GFA also adds a two-year former-NSF-personnel disclosure, states that publication costs will be disallowed, and aligns suspension and termination provisions with the proposed OMB framework. Other GFA provisions rely on or would be materially affected by proposed sections concerning pre-issuance review and award selection under proposed 2 CFR Section 200.205, recipient risk assessments under proposed Section 200.206, additional award conditions referred to in proposed Section 200.208 as “specific conditions,” international participation, payment documentation, subrecipient administration, and award termination. Where relevant, the detailed comments below identify the related proposed 2 CFR sections.

OMB has not issued a final rule. OMB’s proposed October 1, 2026 effective date, final text, applicability, and transition provisions remain unresolved. If OMB revises, delays, or withdraws its proposal, NSF and recipients could be required to revise guidance, award terms, policies, systems, and training more than once.

Beyond the timing problem, UC also objects to several of the underlying OMB-derived provisions. As explained below, the GFA would import unresolved changes affecting merit review, international participation, publication-cost allowability, fixed amount awards, payment documentation, and suspension and termination. Incorporating those provisions into NSF guidance does not resolve the concerns raised in the OMB rulemaking; it operationalizes them within NSF before OMB has acted. NSF should remove or defer provisions that depend on OMB's proposed rule and retain the current PAPPG approach in those areas. If OMB issues a final rule, NSF should evaluate the final text against NSF's statutory mission and award portfolio, assess recipient burden and system requirements, and provide focused stakeholder review before implementation. If NSF determines that it cannot defer an OMB-dependent provision, the GFA should refer directly to the final applicable provision of 2 CFR Part 200 rather than reproduce language from the pending proposal. This would reduce the risk that NSF and recipients build policies, systems, award terms, and training around text that is revised or withdrawn before taking effect.

The GFA also states that it is aligning NSF policy with several Executive Orders. Where an Executive Order is the source of a material eligibility rule, certification, cost restriction, review standard, or award condition, NSF should identify the statutory or regulatory authority for the recipient obligation, explain how the requirement applies within NSF's programs, and state its effect on pending proposals and active awards. A general reference to an Executive Order should not substitute for agency-specific analysis, clear operative language, burden assessment, or prospective implementation.

[G8.A.Procedure 1(b); G8.F; G12.C; G13.D; G26.B; proposed 2 CFR Sections 200.205, 200.206, and 200.208] Merit review, NSF leadership approval, recipient risk assessments, and additional award conditions

UC understands NSF's goal of strengthening accountability in award selection. The current PAPPG provides that, after scientific, technical, and programmatic review, the cognizant Program Officer recommends whether a proposal should be funded and that final programmatic approval is normally

provided at the Division or Office level. The draft GFA instead states that a recommendation must be “approved by the NSF leadership official” before proceeding to the cognizant Grants Officer, without defining that official or explaining whether this language merely describes the existing Division or Office review or creates an additional senior-level policy screen. The undefined leadership approval arises directly from Guide 8. Proposed 2 CFR Section 200.205 would separately add government-wide pre-issuance review and award-selection requirements; Section 200.206 would expand applicant and recipient risk assessments; and Section 200.208 would authorize agencies to impose or modify additional award conditions, including program-level conditions based on an undefined finding of “elevated programmatic risk.” Those provisions, if finalized and applied by NSF, would compound the same concerns.

For scientific and technical awards, expert merit review is the cornerstone of NSF's accountability framework. It provides an impartial, informed assessment of whether proposed research is scientifically sound, feasible, creative, and likely to advance knowledge and benefit society. Scientific research is inherently uncertain, and high-risk, high-reward ideas often cannot be evaluated through rigid checklists or short-term policy preferences. The most durable way to align awards with NSF's mission is to publish the applicable objectives and review criteria in the funding opportunity and apply them through expert review and accountable program judgment. This is not merely a policy preference. Federal law expressly reaffirms merit-based peer review and requires NSF to maintain Intellectual Merit and Broader Impacts as the basis for evaluating grant proposals. 42 U.S.C. § 1862s(a)-(b).

PAPPG 24-1, as modified by Supplement 1, already incorporates Gold Standard Science concepts into NSF's scientific-integrity and data-sharing policies. Guide 13.D would make the proposal-facing expectation more explicit by creating a standalone Gold Standard Science section and stating that NSF expects adherence to its tenets “in proposals,” as appropriate for the field of science and research modality. UC supports rigor, transparency, communication of error and uncertainty, and unbiased peer review. The final GFA should clarify, however, that Guide 13.D does not create an additional unpublished proposal-review criterion, certification, monitoring or audit standard, award condition, or ground for adverse action beyond the criteria and terms stated in the funding opportunity and award. The principles should be applied in a field and method-appropriate manner and consistently with privacy, security, intellectual-property, and established conflict-management obligations.

An additional approval layer based on unpublished or changing priorities would make the process less transparent and could diminish the value of the review record on which applicants and program staff rely. The draft GFA does not itself restate all of OMB's proposed recipient risk criteria in proposed 2 CFR 200.206 or the proposed preference for institutions with lower indirect cost rates in proposed Section 200.205(b)(3). However, Guide 1 states that applicable 2 CFR Part 200 requirements control even when not discussed in the GFA, and Guide 26 excludes additional award conditions imposed under proposed Section 200.208 from post-award dispute review. If OMB finalizes those provisions and NSF applies them, NSF should not use vague reputational factors, preferences based on lower negotiated indirect cost rates, or additional award conditions unsupported by objective, award-related facts.

Negotiated F&A rates reflect federally reviewed institutional costs; they do not measure scientific merit, efficiency, or program value. Guide 12.C appropriately states that NSF program staff may not ask PIs to reduce or waive negotiated indirect cost rates. NSF should retain that protection and should not import proposed OMB language giving preference to applicants with lower negotiated rates.

Guide 4.B9.4 also should be clarified. As drafted, it permits NSF to negotiate an award-specific indirect cost rate “in certain circumstances” without expressly limiting that authority to organizations that lack an applicable federally negotiated rate. NSF should confirm that Guide 4.B9.4 may not be used to displace or renegotiate an existing federally negotiated rate and applies only when no applicable rate exists or when a departure is otherwise authorized under 2 CFR Part 200.

The final GFA also should preserve the current PAPPG's related protections by clarifying that voluntarily foregoing full F&A recovery constitutes voluntary committed cost sharing and that pre-award budget discussions may not be used to renegotiate negotiated rates or other institutional commitments.

UC does not object to applicant or recipient risk assessments, or to additional award conditions, when they respond proportionately to documented noncompliance or material, award-specific risk. UC's concern is with subjective risk factors and with program-level or mid-award conditions imposed without objective evidence, clear notice, or a defined basis for removal. Under proposed Section 200.208, additional conditions may include reimbursement-only payment, heightened financial reporting, additional monitoring or site visits, technical or management assistance, and additional prior approvals.

Applicants and recipients should receive the factual basis for a material adverse determination and a reasonable opportunity to correct inaccurate information or address a documented concern. Any additional condition should be proportional to the identified risk, subject to meaningful review, and promptly removed when the underlying concern has been resolved. The proposed 15-calendar-day period for implementing changed conditions is also too short for complex research awards. NSF should provide a reasonable response and implementation period and permit unaffected award work to continue while reconsideration is pending, absent a documented immediate risk.

UC recommends that NSF:

- Define the role, authority, and criteria of any "NSF leadership official" and confirm that the official may not substitute unpublished or nontechnical criteria for NSF's published Intellectual Merit and Broader Impacts criteria, expert review, and accountable program judgment.
- State material agency priorities and selection factors in the funding opportunity before proposal submission and apply them consistently through the review process.
- Clarify that Guide 13.D does not create an additional unpublished proposal-review or award-enforcement standard and apply its principles according to the field of science and research modality.
- Retain and restore existing F&A protections by rejecting any award-selection preference based on lower negotiated rates; requiring use of the applicable federally negotiated rate; limiting award-specific rate negotiations to organizations without an applicable rate; preserving restrictions on renegotiating institutional commitments during pre-award budget discussions; and clarifying that a voluntary reduction in negotiated F&A recovery constitutes voluntary committed cost sharing.
- Base applicant and recipient risk assessments on objective, verifiable, material information. Limit additional award conditions to those reasonably necessary to address documented recipient- or award-specific risk; do not impose program-level conditions without published, objective criteria and a documented basis; provide written reasons, notice, a reasonable response and implementation period, an opportunity to respond, proportionality, and meaningful review; permit unaffected award work to continue while reconsideration is pending absent a documented immediate risk; and promptly remove the conditions when the identified risk has been resolved.

[G2.C.Policies 2 and 4; G6.G; G22.A; NSF 26-022] International scientific collaboration and restricted entities

UC supports targeted measures that protect national security and prevent NSF funds from supporting entities that present documented risks. Guide 2's international-participation provisions reflect or would operate alongside proposed 2 CFR Sections 200.202(e) and 200.220. The current PAPPG already requires proposers to explain the benefit of NSF-funded work at an international branch campus and to justify funding for a foreign organization or individual based on the benefits to U.S. research and education, the resources or capabilities provided, and the need for the international participation.

The draft GFA would make that justification more prescriptive by requiring the proposer to demonstrate that the international component is necessary and integral to the project, is in the undefined “national interest of the United States,” provides resources not reasonably available domestically, enhances the U.S. scientific enterprise, and has capacity comparable to a domestic recipient.

The concern is not that NSF requires a sound scientific and programmatic justification. Rather, these additional standards may create a separate domestic-substitution and policy test that is difficult to apply consistently. International research frequently depends on location-specific conditions, populations, data, infrastructure, expertise, or established partnerships. It also depends on scientific relationships in which the foreign partner contributes expertise, knowledge, or access that cannot be evaluated solely through a domestic-capability comparison. The relevant question should be whether the international component materially advances the project's scientific or educational objectives and can be administered responsibly, not whether the proposer can establish that no generally similar capability exists anywhere in the United States.

[Dear Colleague Letter NSF 26-022](#) presents a related but distinct concern. NSF has announced that, with the GFA's effective date, it intends to prohibit NSF-funded collaboration with restricted entities and their employees, prohibit certain appointments and research support involving those entities, and require individual and Authorized Organizational Representative (AOR) certifications. These are material eligibility and award-compliance requirements, but the operative policy, definitions, certifications, institutional screening standard, and applicability to pending proposals and active awards are not fully included in the draft GFA available for comment.

The policy also would rely on restricted-party lists maintained by multiple agencies that may change during a multi-year award and that generally identify organizations rather than complete employee rosters. NSF should establish an institutional reasonable-diligence standard and clarify the boundary between prohibited relationships and ordinary open-science activity. Institutions should be permitted to rely on official federal information reasonably available to them, established screening processes, and good-faith individual and subrecipient disclosures. They should not be held strictly responsible for affiliations, employment, or support relationships that were not disclosed and could not reasonably be identified from authoritative sources.

UC recommends that NSF:

- Preserve international research. Remove the presumption in favor of domestic performance and permit international participation when it is scientifically or programmatically justified. Existing proposal, project-description, budget, and subaward materials should satisfy the requirement unless NSF identifies a specific need for additional information.
- Provide clear definitions and implementation guidance. Define “national interest,” “foreign country of concern,” “restricted entity,” “collaboration,” “employee,” “research support,” and “appointment or position.” Publish the complete restricted-entity policy and certifications for stakeholder review and provide an authoritative, version-controlled resource identifying the applicable lists, effective dates, and changes.
- Use targeted, risk-based standards. Tie restrictions to specific, documented security risks; permit reasonable institutional reliance on official federal information, established screening processes, and good-faith individual disclosures; clarify the treatment of ordinary open-science activities; and distinguish deliberate circumvention from good-faith error or prompt correction.
- Protect existing approved activities. Apply new restrictions prospectively and do not require recipients to terminate or materially disrupt active awards, approved foreign components, existing subawards, field research, or other approved activities absent a documented, award-specific security concern, notice, an opportunity to respond, and reasonable transition or wind-down measures.

[G2.C.Terms 3 and 8; G3.C-D and G; G5.B-C; G9.B; G13.B; G14.A; G18.D] Research-security training, disclosures, documentation, risk assessment, and foreign financial reporting

The current PAPPG already contains substantial research-security, disclosure, malign foreign talent recruitment program (MFTRP), and foreign-financial-support requirements. The draft GFA consolidates and revises that framework by expanding the covered senior/key-personnel population, adding proposal-stage training certifications, requiring specified supporting-document review, authorizing analytical risk assessment, and incorporating foreign financial reporting. UC supports measures that protect national security and prevent foreign exploitation of federally funded research. The GFA's express exclusions from the MFTRP definition for scholarly publication, presentations, international conferences, open and reciprocal scientific exchange, and advising students should be retained.

The final GFA also should use a stable and authoritative MFTRP definition. The draft summarizes that definition in terms that may be broader than the statutory framework reproduced in PAPPG 24-1 and directs users to an external webpage for the full definition. Because MFTRP determinations support individual and institutional certifications and may lead to significant award consequences, NSF should either reproduce the controlling statutory definition in the GFA or directly incorporate the statutory provision. A summary definition and an unversioned webpage should not create obligations beyond the statutory standard or allow the governing definition to change during an award without formal notice.

Guide 3 requires the AOR to certify at proposal submission that all senior/key personnel completed research-security training within the preceding year, while Guide 13 prescribes overlapping research-security subjects as minimum content for institutional Responsible and Ethical Conduct of Research education. NSF should permit one qualifying institutional course or coordinated set of modules to satisfy overlapping requirements, recognize equivalent federal or institutional training, and permit a prime recipient to rely on a subrecipient AOR's certification for personnel employed by that subrecipient. The AOR certification should confirm training completion, not constitute an institutional guarantee of each individual's substantive compliance.

Guide 3 also should distinguish facts that an institution can certify from facts known principally by an individual. The draft appears to use two different standards for MFTRP compliance: one requiring the organization to certify the underlying factual condition that senior/key personnel are not participating in an MFTRP, and another requiring the AOR to certify that the individuals were informed of and fulfilled their individual certification responsibility. NSF should consistently use the latter, process-based standard.

The same principle should apply to current and pending support. An institution can certify that it informed covered personnel of their obligations, collected the required certifications and disclosures, reviewed the information through established processes, and submitted the information provided. It cannot guarantee that an individual disclosed information intentionally concealed from the institution and not reasonably identifiable through authoritative sources. Individual personnel should remain responsible for the completeness and accuracy of facts within their knowledge.

Guide 14 requires institutions to report omitted current and pending support within 30 days of identification and separately requires reporting of undefined "other research security violations" within the same period. NSF should replace that open-ended phrase with a cross-reference to specifically identified reportable obligations or define the events that trigger reporting. The final GFA should allow reasonable institutional fact-finding to determine whether a reportable event has occurred and should preserve prompt correction of inadvertent or nonmaterial errors without automatically treating the failure as material noncompliance.

The Summary of Changes states that NSF will pilot the Trusted Research Using Safeguards and Transparency (TRUST) framework as an alternative to returning a proposal without review, while Guide 14 reserves authority to use analytical tools to identify potential nondisclosures. The operative TRUST criteria and procedures are not included in the draft GFA. Before analytical indicators or TRUST measures are used in consequential decisions, NSF should publish the applicable standards, require human review, provide notice of material concerns, allow correction of inaccurate information, document the basis for the decision, and provide appropriate reconsideration.

Guide 14 also requires recipients to maintain and review specified foreign agreements. NSF should state that institutions are responsible for documents actually received and for a good-faith review through established processes, not for concealed arrangements or facts that could not reasonably be identified. Guide 18 already provides detailed Foreign Financial Disclosure Report requirements; the final GFA should ensure that Guide 14 cross-references those controlling requirements rather than creating parallel or incomplete obligations.

UC recommends that NSF:

- Retain the express MFTRP exclusions for scholarly publication, presentations, international conferences, open and reciprocal scientific exchange, and advising students.
- Use the controlling statutory MFTRP definition in the GFA, rather than a broader summary or an unversioned external webpage.
- Avoid duplicative training and certification requirements; recognize equivalent institutional training and subrecipient certifications.
- Harmonize MFTRP certification provisions by requiring the AOR to certify that covered personnel were informed of and completed their individual certification responsibilities, rather than requiring the institution to guarantee the underlying personal facts.
- Revise the current-and-pending-support certification so the AOR certifies the institutional notification, collection, review, and submission process, while the individual certifies the completeness and accuracy of the disclosure.
- Define or cross-reference the events covered by “other research security violations,” apply an appropriate materiality standard, and allow reasonable institutional fact-finding and prompt correction.
- Publish the standards and procedures governing TRUST and analytical risk indicators; require human review, notice, correction, a documented decision, and appropriate reconsideration before consequential action.
- Apply a reasonable-diligence standard to institutional review of foreign agreements and align Guide 14 with the detailed Foreign Financial Disclosure Report requirements in Guide 18.

[G3.C.Policy 4; G3.D; proposed 2 CFR Section 200.112] Former NSF personnel disclosure should be narrowly tailored

Guide 3 adds a two-year former-NSF-personnel disclosure based on proposed 2 CFR Section 200.112. It would require a recipient or subrecipient to identify any employee who “worked on” an application or proposal, or is anticipated to work on resulting award activities, and who was employed by NSF during the preceding two years. The scope must be clear because Guide 3.D states that violations of pre- and post-award disclosure requirements may result in criminal, civil, or administrative consequences. The undefined phrase “worked on” could include routine routing, formatting, system entry, budget preparation, or compliance review by personnel with no substantive influence over the proposal or award. NSF should limit the requirement to personnel named in the project budget or identified as senior/key personnel. If NSF intends to cover other individuals, it should define substantive scientific, technical, budgetary, managerial, policy, or decision-making involvement and expressly exclude clerical, formatting, routing, system-entry, and routine administrative review functions.

[G4.B; G5.H; G12.A-C; G18.A-B; G21.B; G23.A] Publication, public access, data sharing, and allowable scientific-communication costs

UC supports timely dissemination and public access to federally funded research. NSF's current policy, as modified by PAPPG Supplement 2, already removes the publication embargo and updates public-access and Data Management and Sharing Plan (DMSP) requirements. The GFA would carry forward and consolidate requirements for deposit of an author's accepted manuscript at or before publication, public availability of scientific datasets underlying publications by the time of publication, persistent identifiers, metadata, and continuing reporting through NSF systems.

The related GFA cost provisions reflect or would operate alongside proposed 2 CFR Sections 200.421, 200.432, 200.454, and 200.461. The public-access and data-sharing requirements have real costs. Researchers and institutions must prepare and curate data, document metadata, preserve files, manage repositories, address privacy and confidentiality, conduct disclosure and security review, register persistent identifiers, support accessibility, and pay publication or open-access fees where necessary. Yet the GFA's Summary of Changes states that Guide 12 “disallows publication costs” to align with OMB's proposed rule, while Guide 12 continues to refer to allowable publication or research-results-sharing costs before closeout and Guide 21 states that third-party public-access fees remain allowable. This internal contradiction must be resolved before the GFA is finalized.

Guide 4.B6.3 adds to that ambiguity by replacing the current “Publication/Documentation/Dissemination” category with “Documentation and Printing” and omitting the current reference to “publishing or otherwise making available” research findings, even while continuing to list page charges. NSF should restore clear publication and dissemination language and reconcile Guide 4 with Guides 12 and 21.

The scale of the issue is significant. According to a California Digital Library analysis of 2025 UC publication data, UC authors used approximately \$3.7 million in NSF funds to pay article processing charges (APCs) associated with about 1,300 articles.² Those articles represented approximately 15 percent of the 8,847 UC articles for which authors paid all or part of an APC. A categorical prohibition could shift approximately \$3.7 million in annual APC costs away from NSF awards. A routine prior-approval requirement could generate approximately 750 to 900 NSF approval requests annually even under an award-based estimate; if approval were required article by article, the volume could approach 1,300 requests. That would not reduce burden; it would create a large new approval process for costs incurred to satisfy the government's own dissemination objectives. It would also disproportionately affect early-career and under-resourced investigators who lack alternative institutional funds.

The same principle applies to proposed restrictions on reasonable conference participation, professional memberships, scholarly subscriptions, and related scientific communication. These activities are often integral to conducting, validating, and disseminating research. Subscriptions provide access to the scientific literature; conferences enable presentation, peer engagement, and collaboration; and professional memberships may be necessary for access to technical standards, meetings, or publication venues. Treating these costs as categorically suspect would shift costs to institutions and investigators without improving stewardship.

² California Digital Library analysis of 2025 UC publication and article processing charge data, provided to the University of California Office of the President on August 7, 2026. The analysis is limited to full or partial author-paid APCs and does not capture all publication, repository, data-curation, metadata, preservation, accessibility, privacy, security, personnel, or other dissemination costs.

UC recommends that NSF:

- Remove the statement in the Summary of Changes that publication costs will be disallowed, eliminate inconsistent unallowability language, and expressly confirm that reasonable and allocable publication, open-access, repository, data-curation, metadata, persistent-identifier, preservation, privacy, security, accessibility, and personnel costs necessary to comply with NSF requirements remain allowable.
- Preserve the allowability of reasonable conference, professional-membership, scholarly-subscription, and related scientific-communication costs when they benefit the award and comply with the applicable cost principles.
- Apply public-access and data-sharing requirements through approved, discipline-appropriate DMSPs and preserve justified limitations involving privacy, consent, security, Tribal interests, intellectual property, proprietary information, and technical feasibility.
- Reconcile Guides 4, 5, 12, 18, 21, and 23 so that recipients receive one clear and internally consistent statement of the required activities, allowable costs, timing, repository expectations, and reporting obligations.

[G1.D-E; G11.B-D; G17.A-B] Fixed amount awards and established PAPPG flexibilities

The Summary of Changes states that NSF is removing references to “fixed-price awards” in anticipation of proposed 2 CFR Section 200.201(b), while proposed Section 200.333 would eliminate fixed amount subawards. If NSF intends the removal of “fixed-price” references to eliminate or restrict fixed amount awards or subawards, UC opposes that change. Fixed amount awards are not a relaxation of oversight; they are a performance-based tool that allows NSF to hold recipients accountable for defined results or milestones rather than requiring transaction-level cost documentation in every case. When objectives, performance measures, and payment terms are clear, these awards can reduce administrative burden for both NSF and recipients while preserving technical reporting, program oversight, and accountability for results.

Eliminating the mechanism would force more discrete, milestone-based, educational, conference, outreach, participant-based, or other readily verifiable activities into cost-reimbursement structures that require additional tracking, invoicing, and review regardless of risk. The draft does not explain why eliminating the mechanism would provide greater oversight than appropriately designed milestones, payment terms, technical reporting, and targeted monitoring. Replacing a results-oriented tool with a process-oriented one would not improve accountability or burden reduction.

The draft also removes Special Creativity Extensions and Accomplishment-Based Renewals. The current PAPPG uses these mechanisms to respond efficiently to exceptional scientific progress and sustained productivity. Special Creativity Extensions allow NSF to capitalize on adventurous, high-risk opportunities that emerge during successful work. Accomplishment-Based Renewals provide a streamlined, merit-reviewed path for investigators with a strong record of results. Ordinary no-cost extensions, supplements, and traditional renewals do not necessarily serve the same purposes and may increase proposal preparation and review burden for both NSF and the research community.

The final GFA also should retain the current PAPPG’s express recognition that recipients may internally approve increases or decreases in senior/key-personnel effort after award, including changes that result in salary support exceeding the two-month proposal policy, unless the change would alter the project’s approved objectives or scope. Omitting that clarification could be read as creating a new prior-approval requirement for ordinary post-award rebudgeting.

Guide 11 also changes established standards governing project evolution. The current PAPPG states that PIs and co-PIs should be free to pursue promising leads and adopt alternative approaches within the

approved project objectives, while notifying NSF of significant changes in methods or procedures. It also requires prior approval for a change to the Facilities, Equipment and Other Resources section only when that change would constitute a change in objectives or scope. The draft GFA instead states categorically that changes to that section constitute a change in scope. NSF should retain the current materiality standard so that routine changes in available facilities, equipment, methods, sequencing, or personnel support do not automatically become prior-approval events.

The current PAPPG already permits NSF to reduce continuing increments in limited circumstances to respond to changes in the general level of funding or major new opportunities in a particular field, but it requires full written justification, management review and approval, and states that reductions are rare absent major, unanticipated fiscal-year constraints. Guide 17 replaces that more specific framework with a broader statement that NSF may reduce increments in response to “broad funding changes or new priorities” without carrying forward the same safeguards. UC recognizes that future increments remain subject to satisfactory progress, available appropriations, and approved reports. New policy priorities, however, should govern future funding opportunities and awards rather than reduce an otherwise compliant continuing award after recipients have made commitments in reliance on the award structure.

UC recommends that NSF retain fixed amount awards where appropriate; preserve Special Creativity Extensions and Accomplishment-Based Renewals or establish clearly equivalent mechanisms; restore the current PAPPG’s post-award rebudgeting authority for changes in senior/key-personnel months when scope remains unchanged; distinguish material changes in project objectives from ordinary scientific evolution; and base decisions on continuing increments on objective, award-specific grounds.

[G15.A.Terms 8-9; G15.A.Policies] The GFA should distinguish acquired property from research materials created or collected during award performance

UC supports responsible stewardship of federally funded property and appropriate preservation and sharing of scientifically valuable research collections. Guide 15, however, creates substantial uncertainty by defining Tangible Personal Property to include biological specimens, core samples, and other physical research products and then defining Recipient Titles Property as federally funded property held in trust and subject to management, maintenance, reporting, encumbrance, and disposition requirements.

Read together, these provisions could be interpreted to subject materials created or collected through the research process to controls designed principally for acquired equipment and capital property. Research materials may include short-lived experimental organisms, tissue or environmental samples, assay materials, physical models, cultures, specimens, and other products that are consumed, altered, discarded, hazardous, privacy-sensitive, subject to informed-consent limitations, or no longer scientifically useful. Treating all such materials as Recipient Titles Property could require recipients to inventory, preserve, and obtain disposition authorization for materials never intended for permanent retention. It also could conflict with biosafety, human-subjects, animal-care, Tribal, privacy, and data-management obligations.

The final GFA should distinguish property acquired for project use from materials created or collected through the scientific process. For created or collected research materials, NSF should preserve the current PAPPG approach under which legal rights ordinarily remain with the recipient or investigator, subject to appropriate scientific-sharing responsibilities and any specific award, legal, ethical, safety, or DMSP requirements. If NSF intends certain physical research products to be subject to Recipient Titles Property controls, it should identify them expressly in the award or approved DMSP and define the applicable retention, inventory, maintenance, mid-award disposal, closeout, and cost requirements. Routine or short-lived experimental materials should not become federally controlled property merely because federal funds supported their creation or collection.

[G11.D; G17.B; G25.A; G26.B] Additional award conditions, continuing support, suspension, termination, and appeals

The draft aligns Guide 25 with proposed 2 CFR Sections 200.211(c)(1)(v) and 200.340 through 200.343 and would operate alongside proposed Section 200.208 on additional award conditions. It describes changes in priorities as a potential reason an award may be suspended or terminated. Federal grants and cooperative agreements for research are not procurement contracts. They are assistance agreements supporting projects selected through NSF's merit-review and award processes. Once issued, they create real, reliance-based commitments: students and postdoctoral scholars accept supported positions, field seasons and longitudinal data collection begin, subawards and contracts are executed, specialized equipment is purchased, and communities and collaborators organize around approved work.

Allowing otherwise compliant work to be ended midstream for post-award policy reasons would not protect federal investments; it would undermine them. It could waste funds already expended, interrupt research that cannot be readily restarted, and harm individuals and partners that reasonably relied on the award. Changes in policy priorities should guide future funding opportunities, not serve as a basis for terminating ongoing work unrelated to recipient performance or compliance.

NSF should retain authority to act promptly when necessary to address fraud, material noncompliance, unlawful use of funds, documented security risk, research misconduct, failure to perform, or other objective cause. Serious actions should, however, be supported by written reasons identifying the legal authority, factual basis, and award terms at issue; preceded by notice and a meaningful opportunity to respond except in a documented emergency; and limited to measures proportionate to the actual risk.

Guide 25 requires recipients to submit a progress summary and detailed accounting of costs within 30 days of termination and generally provides a 30-day response period to a notice of noncompliance. Those provisions are useful, but the draft does not identify the required elements of the termination-cost submission, address extensions for complex awards, or explain how NSF will treat personnel appointments, subawards, equipment orders, and other commitments made in reasonable reliance on continued funding. NSF should define the submission process, permit reasonable extensions when warranted, and direct Grants Officers to consider the reasonableness and avoidability of reliance-based commitments before settling allowable costs. Any suspension should be lifted promptly once the identified issue is resolved.

Guide 26 usefully places appeal procedures in one location and provides review for some terminations and settlement disputes. It nevertheless excludes specific conditions, prior-approval decisions, revisions to program plans or budgets, and decisions not to award a continuing increment or supplement. Those decisions can materially interrupt an award and may turn on factual or policy errors. A final and unappealable agency decision is not meaningful review if the recipient cannot obtain consideration of the record, the applicable standard, or the accuracy of the facts underlying the action.

UC recommends that NSF:

- Limit suspension and termination to objective, cause-based grounds, mutual agreement, lack of legal authority or available funds, or additional award conditions identified in the award at issuance; remove changed priorities or generalized national-interest determinations unrelated to recipient performance or compliance.
- Apply policy changes prospectively and protect active awards, continuing increments, approved budgets, subawards, collaborations, and data-management commitments absent a documented award-specific basis for action.

- Require written, reasoned determinations, advance notice, a meaningful opportunity to respond, time-bound suspensions, and a defined path to resolution, except where a documented emergency requires immediate action.
- Permit reasonable wind-down and closeout costs involving personnel, participants, subawards, contracts, equipment, safety, data preservation, and regulatory obligations.
- Define the termination-cost submission and settlement process; retain the usual 30-day response period; permit reasonable extensions for complex awards; provide a defined corrective-action period before termination; and require NSF to consider costs and commitments reasonably incurred in reliance on the award.
- Provide independent review of specific conditions, denials of continuing increments, and other decisions that materially affect award performance when the dispute concerns factual accuracy, applicable award terms, available appropriations, or stated program criteria.
- Ensure that actions not based on recipient fault do not prejudice future eligibility or reputation and that government-wide reporting ordinarily occurs only after available review procedures are complete.

[G3.G; G4.B2, B5, B8.2, G5.C, G12.B; G13.B; G14.A; G16.B; G18.D; Information Collection No. 3145-0058; proposed 2 CFR Sections 200.331 and 200.332] Administrative burden, payment documentation, subrecipient administration, and systems

NSF estimates an average of 120 hours per proposal, but the GFA is not only a proposal-preparation collection. It would require one-time and recurring institutional work involving proposal-routing and certification systems, research-security training and review, current and pending support, restricted-entity screening, foreign-agreement documentation, Foreign Financial Disclosure Reports, public-access deposits and metadata, data curation, property reporting, award monitoring, subrecipient administration, and disputes. These activities involve investigators, departments, sponsored-project offices, compliance units, libraries, information-technology staff, finance and property offices, and subrecipients.

Electronic submission does not eliminate burden merely because information is transmitted online. The principal work is often identifying the correct information, reconciling it across institutional systems, obtaining individual and organizational certifications, validating entries, protecting sensitive records, resolving errors, and maintaining updates throughout an award. NSF should separately estimate recurring collections and the one-time costs of policy, system, workflow, and training changes. The estimate also should account for the longstanding cap on recovery of the administrative component of F&A costs, which causes institutions to absorb a substantial portion of new compliance infrastructure.

The draft GFA also contains an internal cost-treatment inconsistency. Guide 4.B2 states that actual-cost fringe benefits may be charged only if the institutional policy has been approved by NSF, while Guide 12.B recognizes approval by the cognizant federal agency for indirect costs. NSF should retain recognition of cognizant-agency approval, cross-reference 2 CFR Section 200.431, and avoid requiring duplicative NSF approval for a practice already approved through the applicable federal cognizance process.

Guide 16 describes the existing Award Cash Management Service (ACM\$) payment process and does not appear to require a separate narrative justification for each draw. NSF should expressly confirm that proposed 2 CFR Section 200.305(c), if finalized, would not be implemented through the GFA as a payment-by-payment performance narrative or supporting-document package for routine drawdowns. Routine payment requests are already supported by recipient financial systems, internal controls, project reports, audits, and NSF monitoring. Enhanced documentation should be limited to unusual activity, material deviation, documented award-specific risk, or a valid condition imposed under proposed Section 200.208, with clear notice of what is required.

Where the GFA places duties on subrecipients or requires prime-recipient certifications, responsibility should be assigned to the entity best positioned to perform it. Prime recipients should be able to rely on reasonable documentation and AOR certifications from subrecipients, and each subrecipient should remain responsible for its own personnel, records, and downstream subrecipient-or-contractor determinations. Strict prime-recipient responsibility for information or relationships beyond its reasonable knowledge would increase burden and discourage collaboration with smaller or less-resourced partners.

Proposed 2 CFR Section 200.331(c), if finalized and applied by NSF, could also be read to require transfers to affiliates or subsidiaries to be structured as subawards or procurement contracts rather than internal distributions. NSF should clarify that transfers among components of a single legal recipient remain internal and should preserve proportionate treatment for affiliated entities operating under common governance, shared systems, consolidated audit coverage, and established compliance controls where full subaward treatment would be duplicative and add no meaningful oversight.

Proposed Section 200.332(i) would separately require pass-through entities to monitor whether subrecipients take actions that could “significantly damage the reputation” of the pass-through entity, federal agency, or federal government. That undefined standard is not tied to award performance, financial stewardship, or material compliance and could require monitoring of activities beyond the funded project. NSF should not implement this requirement. Subrecipient oversight should remain tied to objective, award-related performance, compliance, and financial-risk factors.

Burden reduction requires interoperable systems, prepopulation, reusable profiles and certifications, batch functions, machine-readable restricted-party information, clear validation rules, accessible technical specifications, and avoidance of duplicate entry across Research.gov, SciENcv, the Public Access Repository, ACM\$, property-reporting, and award-reporting modules. NSF should resolve internal inconsistencies before estimating burden or beginning implementation.

Where explanatory guidance has been relocated, NSF should provide point-of-use cross-references. For example, the current PAPPG’s clarification that payments to human research subjects are not participant support appears in proposed Guide 4.B8.2, but Guide 4.B5 does not direct budget preparers to that provision. A direct cross-reference would preserve the benefits of streamlining while reducing classification errors and the need to search across multiple guides and external authorities.

UC supports the topic-based structure, separation of policy from procedure, and clearer identification of user responsibilities. The final GFA should remain searchable, accessible, downloadable, cross-linked, and version controlled, and external webpages should supplement rather than replace operative requirements. NSF should also publish a concise disposition table or change log identifying material PAPPG provisions that were moved, revised, deleted, or newly added. NSF also should retain or replace the current PAPPG’s concise proposal-process illustration as part of the final GFA’s user-support materials.

[Summary of Changes; G1.B; G10.A; G17.B; G25.A] Prospective implementation and adequate transition

A replacement of this scope cannot be implemented responsibly on an immediate or abbreviated schedule. NSF and recipients will need to understand final requirements, revise policies and systems, train personnel, update proposal and award workflows, coordinate subrecipient expectations, and test Research.gov, SciENcv, ACM\$, public-access, property-reporting, foreign-financial-disclosure, and restricted-entity tools. Implementation risk is heightened because parts of the draft depend on OMB’s proposed, nonfinal rule and because NSF has announced material requirements intended to take effect with the GFA that are not fully included in the draft text.

Material new obligations should apply prospectively to proposals submitted on or after an identified effective date and to awards issued under those requirements. Pending proposals should remain governed by the requirements in effect when submitted unless NSF gives the proposer a reasonable opportunity to elect otherwise. New requirements should not be imposed on active awards, approved budgets, existing subawards, approved foreign components, ongoing collaborations, publication commitments, or approved data-management plans absent a statutory requirement or documented award-specific risk and appropriate process.

NSF should provide at least twelve months after issuing complete final guidance, certifications, data specifications, and operational system requirements before enforcing material new obligations. System-dependent requirements should begin only after the systems are available, tested, accessible, and supported by training and help resources. During transition, NSF should emphasize education, technical assistance, and reasonable opportunities to cure good-faith implementation errors rather than immediate adverse action.

Before the effective date, NSF should provide a concise implementation notice identifying material new or substantially revised recipient obligations and explaining how each applies to pending proposals, new proposals, new awards, continuing increments, supplemental funding, no-cost extensions, and active awards. Because the GFA incorporates external policies, manuals, restricted-party lists, and webpages, NSF should version and archive the GFA and each incorporated instrument and make prior versions permanently accessible to recipients, program staff, auditors, and oversight officials. Award terms should identify the version governing the award and explain whether and when later changes apply. Where a subsequent statute or final regulation must apply to an existing award, NSF should issue a dated notice identifying the legal basis, applicability, effective date, and transition requirements. Material eligibility rules, certifications, reporting duties, and award conditions should not change for active awards through an unannounced webpage revision.

Conclusion

The federal research enterprise is one of the nation's most successful public investments and a cornerstone of U.S. global leadership. NSF has been central to that success. Its effectiveness rests on a simple but essential model: research funding decisions are guided by scientific merit, expert review, transparent program objectives, open communication, responsible stewardship, and a long-term commitment to advancing knowledge and solving societal challenges.

The draft GFA goes beyond modernization of that framework. It embeds material policy changes within a large reorganization; anticipates unresolved OMB provisions; creates or expands consequential research-security, international-collaboration, disclosure, certification, reporting, data-management, property-management, and risk-review duties without complete standards; creates uncertainty about costs required for public access and scientific communication; removes useful PAPPG flexibilities; and broadens adverse-action authority in ways that could make meritorious, compliant research less stable and more burdensome to administer.

The stakes extend beyond the research community. Taxpayers invest in NSF with the expectation that its awards will produce new knowledge, strengthen national and economic security, train the scientific workforce, create technologies and industries, and generate solutions to public challenges. A framework that makes research less merit-based, less collaborative, harder to disseminate, or more vulnerable to interruption diminishes the return on that investment.

For the reasons outlined in this letter, the University of California urges NSF not to finalize or issue the draft GFA in its current form. If NSF chooses to proceed, it should substantially revise the draft GFA to address the concerns described above, provide any materially revised requirements for focused stakeholder review, and establish a prospective effective date only after complete guidance and functioning systems are available.

Thank you for considering UC's comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'DM', followed by a long, horizontal, wavy line that extends to the right.

Deborah Motton, Ph.D.
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