

August 24, 2026

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

Submitted electronically via [www.regulations.gov](http://www.regulations.gov)

**Re: Comments of the Natural Science Collections Alliance 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 Natural Science Collections Alliance (NSC Alliance) 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). NSC Alliance represents an international community of natural history museums, botanical gardens, herbaria, and universities that steward natural science collections—a foundational national research infrastructure of billions of specimens documenting life on Earth.

We support what NSF has set out to do with the GFA: organize the guidance by topic and include writing in plain language; these changes will help many in our community, particularly the small museums, herbaria, and field stations with no sponsored-projects office. Our primary concerns center on the decision to align the draft with OMB's proposed revisions to 2 CFR Part 200, a rule that is not final, and that choice carries several of the proposal's most consequential features into NSF policy before the public comment on it has been considered. Each comment below begins with the guide and section it addresses in brackets, per NSF's instruction.

**1. NSF should not pre-emptively adopt a rule that is not finalized.**

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

A stated purpose of the GFA within the Summary of Changes 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." Four changes are tied expressly to that proposal: the removal of fixed-price award references (Guide 1), the required disclosure of former NSF staff (G3.C), the assertion that publication costs are disallowed (Guide 12), and the alignment of termination provisions (Guide 25). The rule remains a proposal; comment closed on July 13, 2026, and OMB has issued nothing final. Matching NSF policy to it now assumes the result of a rulemaking still in progress and binds recipients to text that may yet be rewritten or dropped. Nor is "alignment" defined, so the reach of the proposal into NSF practice cannot be gauged. We urge NSF to hold back every provision resting on the proposed rule and to re-propose the affected sections once a final rule exists. We ask as well that NSF confirm the removal of fixed-price prime award references does not disturb a recipient's ability to make fixed amount subawards under 2 CFR 200.333, which permits them with the agency's prior written approval and which lets smaller partners join multi-institutional digitization networks. The draft says nothing about fixed amount subawards either way.

## **2. The extent of pre-application of the OMB proposed rule is unclear and could place shifting political priorities above scientific merit.**

### **[G8; G8.F; General]**

The draft does not clarify how much of the proposed rule it means to apply, and the consequences of that silence are clearest in merit review. Proposed 2 CFR 200.205 would have a senior appointee confirm that any proposed award advances the President's policy priorities and the national interest—neither of which is defined. If that provision is finalized and applied here, political judgment would outrank scientific merit in deciding what NSF funds. Research based on scientific collections accumulates over decades and seldom matches an administration's near-term agenda, so a filter of undefined scope falls hardest on the long-horizon work collections exist to support. Section 200.205 is never mentioned in the draft, yet G8.A already conditions further processing on approval by an unnamed "NSF leadership official," a gate PAPPG 24-1 did not contain. Compounding the uncertainty, both Senate-confirmed offices at NSF—Director and Deputy Director—are vacant, with an interim official performing the Director's duties leading the agency. We ask NSF to state whether and how it intends to apply § 200.205, whether the "NSF leadership official" in G8.A is the reviewer that provision contemplates, and how independent judgment would be documented across roughly 8,300 awards a year.

Guide 8 warrants attention on its own terms. Its Summary of Changes entry reports nothing significant, yet where PAPPG 24-1 named the responsible office—programmatic approval rested at the Division or Office level—G8.F substitutes a "supervisory senior scientist" and unspecified "senior program staff." The review survives; the accountability does not. NSF should identify these officials and the standard applied at each stage. G8.F also keeps PAPPG's definition of the Award Abstract as "[a]n NSF document that describes the project and justifies the expenditure of federal funds by articulating how the project serves the national interest," but drops the words that followed and explained what "national interest" meant: PAPPG tied it to "NSF's mission: 'to promote the progress of science; to advance the national health, prosperity and welfare; or to secure the national defense.'" The mission statement itself, which originates in the National Science Foundation Act of 1950, still appears at G1.A, but only as background about the agency; nothing in G8.F now connects the two. We ask NSF to restore the mission language in G8.F and to confirm that no step in that section displaces the two merit criteria Guide 8's Authorities section attributes to the National Science Board.

## **3. Termination grounds should be fully outlined in the guidance.**

### **[G25.A; G11.D]**

PAPPG 24-1 set out six grounds for suspension or termination in the guide's own text, among them termination where an award "no longer effectuates the program goals or agency priorities." A priorities-based ground has therefore appeared in NSF's prior guidance, though PAPPG did not describe it as cause; it stood beside noncompliance and research misconduct. G25.A changes that arrangement in three ways: several of the enumerated grounds are replaced by a citation to 2 CFR 200.339 and 200.340, so the standard is no longer where recipients would look for it; the grounds are gathered under one "for cause" rubric that flattens the difference between a compliance failure and a policy shift; and the narrative speaks of "changes in priorities" without saying whose, though PAPPG and § 200.340(a)(4) both say agency priorities while the pending rule invokes administration priorities and the President's. G25.A cites § 200.339 and § 200.340 without fixing a date or edition, so read as a dynamic reference any change OMB

adopts would enter NSF policy without further notice. The consequences reach our community directly: a digitization project stopped midway leaves a collection partly cataloged and unusable, and a monitoring series broken after decades leaves a gap nothing can fill. Ending work already underway for reasons unrelated to its quality forfeits an investment the public has already made. Early termination falls hardest on grant-hired or grant-funded staff and students, who are often trainees or emerging professionals early in their careers. Early termination of grants merely because of shifts in administration priorities thus threatens long-term scientific workforce development, and the fear that funding could be terminated makes trainee positions more tenuous, less desirable, and less likely to be sought by the nation's brightest future scientists. We ask NSF to set out the grounds for suspension and termination in full in G25.A, to cite the regulation as of a fixed date, and to provide that an award will not be ended because political priorities have shifted—a basis distinct from the agency-priorities language in PAPPG and § 200.340(a)(4), and one no future revision of this guidance should introduce. G11.D leaves a parallel gap, permitting NSF—after consulting the AOR—to replace a PI, cut funding, or end an award, while stating no criteria, no timeline, and no requirement that the affected PI be notified.

#### **4. Whether publication costs are allowable is left unresolved.**

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

According to the Summary of Changes, Guide 12 "[d]isallows publication costs consistent with proposed revisions to 2 CFR 200." The guides say otherwise in three places. Guide 12 carries no such prohibition; its post-end-date timing rule at G12.A takes allowability for granted, letting recipients charge "allowable publication or research results sharing costs before closeout as permitted." G4.B treats "[r]eports, reprints, page charges and illustrations" and "[d]ata deposit and curation costs" as allowable. And G21.B, having noted that Public Access Repository deposits "do not require the payment of any third-party fees," adds that such fees "are still allowable expenses on NSF awards." For our community the uncertainty is costly in practice: systematic and taxonomic work appears in journals that bill for pages and figures, and depositing specimens and/or related data can carry curation charges that have to be budgeted when a proposal is written. G21.B raises the stakes further by ending the 12-month publication delay and requiring deposit of accepted manuscripts at or before publication. This no-embargo policy may increase the number of journals that require open-access fees before results can be deposited in NSF's PAR, and if these fees cannot be charged to the grants that funded the work investigators will be forced to choose where to publish based on institutional funding rather than the quality and impact of their federally funded research. NSF should not compel immediate public access while leaving the allowability of its costs unsettled. We urge NSF to remove the contrary statement from the Summary of Changes and to state plainly in Guide 12 that publication and data deposit costs are allowable.

#### **5. Research-security requirements should not impede legitimate international collections work.**

##### **[G14.A; G22.A; G5.B; General]**

Natural science collections are inherently international: specimens travel across borders on loan and exchange, high-quality research often demands that scientists visit many collections, the type specimens that fix taxonomic names sit in institutions worldwide, and the fieldwork that documents biodiversity requires travel to every continent. We support security measures aimed at real risks. Our concern is with provisions that the draft leaves unaddressed. Proposed 2 CFR 200.220 would prohibit expending award funds on collaboration with covered foreign countries and entities absent statutory authorization or

agency approval, and proposed § 200.202(e) would confine the international elements of a program to those the agency determines are justified and in the national interest. Neither appears in the GFA, though the draft is written elsewhere to align with that rule. We ask NSF to confirm it will not implement those provisions except through guidance opened to comment, and to state in G14.A that ordinary specimen loans and exchanges and permitted fieldwork are not treated as research-security risk indicators, with a cross-reference in G22.A alongside the existing permit and host-country requirements.

A requirement announced after this notice also deepens the concern. NSF's Dear Colleague Letter of July 8, 2026, Prohibition on Collaborations with Restricted Entities (NSF 26-022), gives notice of a policy the agency plans to bring into force 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." Senior and key personnel would be prohibited from collaborating with any entity on twelve federal restricted-party lists on research funded by their NSF award, and, whether or not the foreign collaboration is NSF-funded, from holding an appointment or position with, or receiving research support from, such an entity for the duration of the award. The AOR and every senior or key person would certify at submission, and the institution would have to find and correct prohibited activity before funds move. None of this appears in the draft or in the burden estimate, though NSF would start it at or about the same time as this guidance.

Whether that prohibition reaches unpaid positions is unclear. Collections researchers routinely hold unpaid research associate and honorary curator appointments elsewhere, often abroad, as ordinary professional practice. The Dear Colleague Letter does not say whether such positions count, while G5.B defines appointments and positions to include any titled position "whether remuneration is received, and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary)." If that definition governs, an unpaid honorary title at a foreign museum could disqualify a curator from serving as senior personnel on an NSF award. NSF should say expressly whether unpaid and honorary appointments fall within the prohibition. It should also write the requirement into the GFA where it can be reviewed and estimate the cost of the screening and certification it would impose. Few museums or herbaria employ anyone to check such affiliations against twelve separate lists. NSF should either publish a single consolidated, machine-readable list covering all of them or confirm that screening against the existing Consolidated Screening List, which G12.E already cites, satisfies the requirement for the lists it covers.

## **6. The draft introduces uncertainty about the ownership of biological specimens.**

### **[G15.A; G21; Summary of Changes (G15, G21)]**

NSF-funded research frequently results in the acquisition or creation of biological specimens or samples, both through field collection and in the lab. It is critical for their long-term research value and for the reproducibility of the research that specimens and their derivatives be deposited in a museum collection or another appropriate repository. This requires that investigators and their institutions have the right to legally transfer specimens or samples to a collection during the course of the grant. PAPPG 24-1 addressed this in Chapter XI.D.5, "Tangible Property," which gave "insects, marine life, drilling core samples and genetically-altered microorganisms" as examples and provided that "[u]nless otherwise provided in the award, all legal rights to tangible property collected or created during NSF-assisted research remain with the recipient or investigators as determined by the policies of the organization." Sharing was a professional obligation, not a federal property control. Indeed, PAPPG 24-1 provided

additional guidance that investigators could include in their Data Management and Sharing Plan (DMSP) “plans for archiving data, samples, and other research products, and for preservation of access to them.” Together, these provisions gave investigators and their institutions a clear default rule about who held rights to specimens and samples, and a mechanism to set out a strong, peer-reviewed plan for their long-term care and accessibility.

The draft deletes the PAPPG tangible property provision. PAPPG treated specimens as a research-products question, under Intellectual Property; the draft treats them as a property-management question. G15.A defines "Tangible Personal Property" to include "biological specimens, core samples, and other physical research products." Apart from that definition and passing use inside the definitions of Equipment and Federally Owned Property, the term appears in Guide 15 only in the name of a reporting form, and no policy in the guide states who holds title to tangible personal property that is not equipment. Policy 2 under G15.A addresses title only for equipment. The new category of Recipient Titles Property is defined circularly, as property for which the recipient holds "conditional title"—a term the draft uses once and never defines—and its opening words, "[f]ederally funded property ... including equipment," are broad enough on their face to reach specimens, though nothing in the guide confirms or excludes that reading. What the draft does say sweeps broadly: Policy 1 provides that "[p]roperty acquired under or improved with the NSF award must be held in trust by the recipient or subrecipient for the beneficiaries of the project or program under which the property was acquired or improved," and property held under conditional title is property whose "ownership and disposition ... will be determined" at the conclusion of the award. The draft G5.H does include “samples” and “physical collections” as research product categories in the DMSP, and requires eight fields for each category, but none of those fields addresses who owns a specimen or who may lawfully transfer it to a repository. As a whole, the draft introduces uncertainty about the ownership of tangible research products, without providing clear information about how they can be transferred or shared.

Collections don’t work this way. Institutions proposing to transfer samples and the museum collections proposing to accept them for permanent curation must know who owns them and has the legal right to transfer them. All transfers must be binding beyond the term of the grant. Policy 7 has NSF issue disposition instructions for Recipient Titles Property at the end of an award, while the guide never says whether specimens are such property; under the draft guidance an institution can therefore not tell whether the specimens it is accepting will be subject to later restrictions that would conflict with its policies or with the state, federal, and international law already governing them. This uncertainty will hinder the transfer of specimens and samples to permanent repositories where they can be stored and made accessible.

We suggest that NSF, in the GFA, clarify that specimens, samples, and other tangible research products are owned by the institution unless there is specific guidance in the grant terms and conditions that indicate otherwise, in plain language that guides investigators, grant recipient institutions, and collecting institutions. NSF should also continue to encourage the long-term preservation of scientific specimens and samples in appropriate repositories as part of healthy data management practices. By supporting the long-term preservation of tangible products of funded projects, this would support scientific reproducibility and transparency, in keeping with Gold Standard Science.



## **7. The scope and application of the modified RCR requirement and addition of research security training are unclear.**

### **[Summary of Changes (G13, G14); G3.G; G13.B; G14.A]**

The GFA codifies new requirements for research security training, sometimes as a separate provision and sometimes as part of the pre-existing training requirement for the responsible conduct of research (RCR). PAPPG 24-1 required an RCR training plan and mandated that mentoring be included. G13.B extends required RCR training beyond mentoring to cover awareness of research security threats and federal export control, disclosure, and reporting requirements, and it makes the institution responsible for tracking and verifying completion by every undergraduate, graduate student, postdoc, faculty member, and senior person supported by an award. G14.A meanwhile requires research security training of proposers and senior/key personnel against a different topic list—a category that expressly excludes graduate students—and the draft never says whether one training satisfies both, or which list governs where they overlap. G13.B and G3.G.4 imply that only “institutions of higher education” are required to certify their RCR training plans and include the new research security requirements in RCR training, but G3.G.10 suggests the provisions of G14.A apply to all institutions; PAPPG IX.B applied this training requirement to “an institution”. We ask NSF to reconcile the two provisions containing the new training requirements, and to confirm whether G13.B reaches recipients that are not institutions of higher education, including many museums, botanic gardens, and herbaria.

## **8. The burden estimate cannot be reconciled with what the draft adds or saves.**

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

The notice sets the burden at an average of 120 hours per proposal and 5,160,000 hours annually. A single average, given without any breakdown, cannot show where NSF has counted the new duties the draft imposes—such as screening for and disclosing former NSF employees (G3.C), the revised Data Management and Sharing Plan requirements (G5.H), the expanded training requirements in G13.B and G14.A, the public-access obligations in G21.B, and the certification and screening announced on July 8. When these are added to the time required to prepare a full proposal and for existing compliance requirements, 120 hours is probably a low estimate. Nor are these costs fully recoverable. Many institutions in our community have no negotiated indirect cost rate and apply the de minimis rate that G12.C sets at 15% of modified total direct costs—a flat allowance that does not change when NSF adds an obligation. G12.C also provides that indirect cost recovery “is always subject to the availability of funds.” And several of the duties the draft adds attach to the institution rather than to any single award, so they must be maintained whether or not an award is active. For a museum or herbarium with one or two NSF awards, and often with no sponsored-projects staff at all, the marginal cost of these requirements is absorbed rather than reimbursed. We ask NSF to publish a re-estimate that identifies the hours attributed to each new obligation or saved by the reorganized Guide, and that is disaggregated by proposal type, before seeking OMB clearance.

## **Conclusion**

We urge NSF to revise the draft so that it states plainly what is changing and ensures internal consistency across the entire document, 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 the features that are most damaging to collections-based science into NSF's own policies: 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,

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President  
Natural Science Collections Alliance

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