

CASC | Coalition for Academic Scientific Computation

COMMENTS OF THE COALITION FOR ACADEMIC SCIENTIFIC COMPUTATION (CASC)

on the

Proposed NSF Guidance on Financial Assistance (GFA)

Replacing the Proposal & Award Policies & Procedures Guide (PAPPG)

Information Collection 3145-0058

Submitted: August 20, 2026

I. Introduction and Organizational Background

The Coalition for Academic Scientific Computation (CASC) respectfully submits these comments in response to the National Science Foundation's proposed "Guidance on Financial Assistance" (GFA), which would replace the Proposal & Award Policies & Procedures Guide (PAPPG) and align NSF award administration with the Office of Management and Budget's revised Uniform Guidance (2 CFR Chapter I).

CASC is a nonprofit membership organization representing 112 leading higher education and research institutions across the United States. Our members operate the advanced research computing, data, and networking infrastructure that is foundational to federally funded scientific research. CASC submitted comments on OMB's related proposed rule, "Regulation for Federal Financial Assistance" (Docket OMB-2026-0034), and offers these comments on the GFA as the vehicle through which that rulemaking is carried into NSF-specific policy and procedure.

CASC urges NSF not to finalize the GFA in its current form. As detailed below, the transition from the PAPPG to the GFA raises significant concerns about document stability, researcher and institutional rights, administrative burden, and the timing of new requirements relative to institutional review and data-management processes.

II. The GFA Should Remain a Fixed, Citable, and Versioned Document

The PAPPG has functioned as a fixed, citable document: a specific version governs a specific award, and changes are made through a known, periodic revision cycle. The proposed GFA instead points to living web pages that are not versioned and that can change without notice.

This shift creates real problems for institutions that must reference specific policy language in award terms and conditions, subawards, and internal compliance documentation, and for researchers who need a stable point of reference over the life of a multi-year award.

CASC recommends that NSF:

- Maintain a versioned, dated, and archived record of the GFA, with each award citing the specific version in effect at the time of the award;

- Specify in award terms and conditions how and when GFA updates apply to active awards; and
- Adopt a regular, published schedule for GFA revisions, rather than continuous, undated changes to web content.

III. Proposed Changes to Property and Data Ownership Require Clarification

The proposed GFA introduces new definitions of what constitutes property, including treatment of tangible personal property such as biospecimens and research collections, in ways that appear to shift certain rights toward the federal government.

The current PAPPG affirms that legal rights to research outputs generally remain with the recipient institution and its investigators, who may make materials available to other researchers in the scientific and engineering community. CASC is concerned that language preserving this principle may be lost or narrowed in the reorganization from PAPPG to GFA.

CASC urges NSF to retain, without ambiguity, the existing allocation of rights between recipients/investigators and the federal government with respect to research property and collections, and to clarify the treatment of biospecimens and similar materials explicitly rather than by implication.

IV. Data Management and Sharing Plan Timing Should Reflect the Realities of the Proposal Stage

The proposed changes would convert the Data Management and Sharing Plan from a planning-stage document into a required response at proposal submission. At that stage, a Principal Investigator may not yet have completed IRB review or identified an appropriate repository, since the metadata standards required often depend on decisions made later in the research design process.

Requiring a definitive plan before these determinations can reasonably be made places institutions and PIs in the position of guessing at compliance commitments they cannot yet responsibly make.

CASC recommends that NSF retain the planning-document character of the Data Management and Sharing Plan at the proposal stage, with a more detailed, binding plan required after award, once IRB review and repository selection can reasonably be completed. Where elements of the plan cannot be finalized until after these determinations are made, NSF should require that the Data Management and Sharing Plan be updated annually as part of the award's regular annual reporting, rather than leaving unspecified how and when such updates are to be provided.

V. New and Ambiguous Definitions Increase Administrative Burden

Several proposed changes introduce new or altered definitions — including changes to what an Authorized Organizational Representative (AOR) must certify and substantial changes to the treatment of research and academic misconduct — without the specificity needed for institutions to build reliable compliance processes around them.

Consistent with the goal of reducing paperwork burden, CASC urges NSF to define these terms with enough precision that institutions can implement them consistently, and to avoid ambiguity that shifts compliance risk onto recipient institutions without corresponding clarity about what compliance requires.

VI. Concept Outlines and Proposal Process Changes

CASC understands that concept outlines may be required to proceed to a full proposal, routed and tracked through Research.gov. CASC is concerned that this creates an additional competitive gate ahead of the existing merit review process, adding a layer of process rather than reducing burden, and asks NSF to clarify the standard by which concept outlines will be evaluated and to ensure this step does not become a de facto second layer of review outside established merit review procedures.

VII. Alignment with Related Federal Requirements

CASC notes that several elements of the proposed GFA sit in tension with other current federal directives — for example, the treatment of publication costs alongside public access requirements implementing the 2022 OSTP (“Nelson”) memorandum. CASC urges NSF to ensure the GFA does not impose requirements that conflict with public access and open data mandates the community is separately required to meet.

CASC also urges NSF to coordinate with other federal research agencies to ensure consistent definitions and expectations across agencies, so that institutions and investigators are not required to reconcile conflicting standards for substantially similar activities.

VIII. Process: A Full Comment Period Is Warranted

Given the scope of the reorganization — which goes well beyond a routine update to policies and procedures — CASC urges NSF to treat this as a substantive policy change warranting a full and, if necessary, reissued 30-day public comment period, rather than an information-collection revision. Institutions have built administrative structures, training, and compliance processes around the existing PAPPG; a change of this magnitude merits the same level of public input as the original guide.

IX. Conclusion and Requested Actions

CASC respectfully requests that NSF:

- Maintain the GFA as a versioned, dated, and citable document, with a published revision schedule and clear terms for how updates apply to active awards;
- Retain the existing allocation of property and data rights between recipients/investigators and the federal government, with explicit treatment of biospecimens and research collections;
- Preserve the planning-stage character of the Data Management and Sharing Plan at proposal submission, with any elements finalized after award updated annually as part of regular annual reporting;
- Provide precise definitions for new AOR certification requirements and research misconduct provisions;
- Clarify the role and evaluation standard for concept outlines relative to the existing merit review process;
- Ensure consistency with public access and open data mandates and with the definitions used by other federal research agencies; and
- Provide a full 30-day public comment period commensurate with the scope of this reorganization.

CASC is prepared to work constructively with NSF to develop a Guidance on Financial Assistance that reduces administrative burden without sacrificing the stability, clarity, and researcher protections that the PAPPG has long provided. We welcome the opportunity to discuss these comments further.