

Report on Research Compliance Volume 19, Number 6. May 26, 2022 Agencies Share Plans to Implement NSPM-33; NSF Seeks Feedback on PAPPG

By Theresa Defino

Since Eric Lander, then-director of the Office of Science and Technology Policy (OSTP), issued implementation guidance for National Security Presidential Memorandum-33 (NSPM-33) just after the first of this year, universities and other institutions have been waiting for details from federal agencies on specific mandates.

For now, all eyes are on the National Science Foundation (NSF), which included related requirements in its new draft Proposal & Award Policies & Procedures Guide (PAPPG). Published in April with a comment deadline of June 13, the PAPPG, when finalized, is expected to go into effect in January.^[1]

NSF is the first agency to share its NSPM-33-related plans, and the bonus for institutions—as Policy Head Jean Feldman is fond of reminding them—is the ability, at least until the deadline, to provide feedback and possibly influence the policies. The draft also provides insight into how other agencies may implement the memo, as NSF and NIH have emerged as the lead agencies in crafting policies emanating from OSTP.

Feldman and Michelle Bulls, director of the Office of Policy for Extramural Research Administration, were among the U.S. research agency officials who gave updates on NSPM-33 implementation during the May meeting of the Federal Demonstration Partnership (FDP), the first such gathering since January.^[2] In general, although the two agencies intend to harmonize their requirements as much as possible, differences will remain.

Series of Disclosures Required

Representatives from the departments of Defense (DOD) and Energy (DOE) also participated, though they had fewer details to share as their policies are still in development. During the meeting, members of FDP also expressed their ongoing concerns about NSPM-33 implementation governmentwide.^[3]

The PAPPG includes more detail than NSPM-33 guidance, “based on the questions that we’ve received from the community,” Feldman said.

Feldman said the draft PAPPG marks the first time there is a section on disclosure requirements.

Disclosure information is required for principal investigators, co-principal investigators, faculty and “everyone we identify as senior personnel,” she said.

As Feldman’s slides explain, specific disclosures and updates (as proposed in the PAPPG) and when they would be required are as follows:

- At the time of proposal submission—collaborators and other affiliations, biographical sketch and current and pending support.
 - Prior to making an award—updated current and pending support information must be submitted.
 - After an award is made—if the authorized organizational representative discovers that a disclosure should
-

have been submitted at the time of proposal submission but was not, that information must be submitted within 30 days via a post-award request to NSF. This is not a new requirement, Feldman said.

- At the time of project reporting—both annual and final—principal and co-principal investigators need to specify any new, active or other support, which would be submitted via an attachment.

This document is only available to subscribers. Please log in or purchase access.

[Purchase](#) [Login](#)