



August 24, 2026

Brian Stone
Chief of Staff, Performing the Duties of the Director
U.S. National Science Foundation
Randolph Building
401 Dulany Street
Alexandria, VA 22314

Re: NSF-2026-OTR-0001, National Science Foundation Proposal/Award Information – NSF Guidance on Financial Assistance

Dear Mr. Stone,

The American Political Science Association (APSA) welcomes the opportunity to submit a comment to the National Science Foundation's (NSF) proposed [information collection](#) related to the transition from the Proposal & Award Policies and Procedures Guide (PAPPG) to a new set of policies to be known as the NSF [Guidance on Financial Assistance \(GFA\)](#). APSA writes to express concerns with several provisions within the new policies and to urge reconsideration of the proposed transition.

APSA is a professional organization with over 11,000 members. APSA's core mission is to promote scholarly understanding of political ideas, behaviors, and institutions to inform public choices about government, politics, and public policy; and to enhance the capacity of political scientists to conduct research, improve teaching, and communicate their findings to wider publics. APSA and many of its members rely on research grants from the NSF to support the prolonged advancement of political science scholarship.

It is clear that the proposed transition to the GFA is in response to several recent executive branch actions, including Executive Orders [14303](#) and [14332](#) among others as applicable, and proposed regulatory changes to 2 CFR 200, the regulatory code overseeing federal financial assistance colloquially known as the "Uniform Guidance," issued by the White House Office of Management and Budget (OMB). However, the proposed OMB rule was subject to many thousands of comments in opposition and has yet to be finalized with those comments considered. Furthermore, there is a provision attached to the bipartisan "[Continuing Appropriations Act, 2027](#)" – legislation with a reasonable chance of passing through the United States Congress – which would temporarily block the implementation of the OMB rule even in the case that it is finalized. This would lead to NSF wasting resources to adopt a framework with weaker regulatory authority in the event that NSF moves to adopt the GFA while the OMB rule is statutorily blocked.

Due to the GFA's close association with 2 CFR 200, it is concerning that the NSF is treating this activity as a routine information collection rather than a significant change to a regulation. We request that NSF identify the statutory basis for imposing sweeping changes to award policies and conduct a proper Regulatory Impact Analysis.

While we acknowledge that NSF has the right to occasionally amend its proposal and award guidelines, we disagree that wholesale replacement of the PAPPG with an untested slate of policies is prudent. Such a replacement may risk putting undue burdens on prospective grant recipients to align their proposals with the new policies. Considering how integral the guidelines within the PAPPG are to successful award proposals, putting additional burdens on researchers seeking funding may have the unintended consequence of slowing down NSF-funded scientific research and innovation, and slowing productivity.

We have additional concerns regarding provisions of the GFA listed below. We appreciate your consideration of these concerns and urge for the withdrawal of this rule until stakeholder comments are addressed by NSF.

Guide 1. Section B. – We have concerns with the language included in Guide 1 of the proposed GFA which dramatically alters the foundations of seeking federal research grants and requires applicants to learn an entirely new process based on a proposed rule. Within Guide 1, it is stated that the GFA does not address all requirements of 2 CFR 200, yet applicants must follow applicable requirements whether or not they are discussed in the guides. It also declares that 2 CFR 200 takes precedence over requirements of the GFA except for certain circumstances, despite the fact that transitioning the NSF from the PAPPG to the GFA would be entirely premature until OMB issues the changes to the Uniform Guidance as a final rule. We urge NSF to delay adopting the GFA at least until the OMB rule is made final.

Guide 2. Section A. – Guide 2 replaces the terms “Program Description” and “Program Announcement” with the terms “Broad Program Solicitation” and “Targeted Solicitation”, likely to align with the reorganization of NSF’s programs. It is worth noting that there is still very little transparency regarding the timeline and progress of the reorganization, and the GFA makes these definitional changes without noting the reorganization as a justification, nor defining the difference in meaning or criteria for the new terms in a way that is helpful to prospective grantees. The changes to the terms will add ambiguity for researchers at all career stages seeking to verify the eligibility of their research for certain programs and tailor applications before applying for funding.

Guide 8. Section F. – Under Guide 8 in the GFA, recommended proposals are reviewed by the NSF Program Director for business, financial, and policy review, including risk-based assessments before an award is issued. Notably missing from the GFA are the criteria or standards that may be used by the NSF Program Director to assess the business, financial, and policy issues impacting award issuance or decline. It is unclear what mechanisms for oversight of decisions by the NSF Program Director—the only individual authorized to obligate funds and issue awards—will exist under the new guidance, nor is it clear how the Program Director would have the capacity to effectively review all awards without slowing down grantmaking to a crawl. We request additional transparency of the criteria used to analyze business, financial, and policy risk assessments and for the withdrawal of the changes in Guide 8.

Guide 12. – Under Guide 12, several restrictions are placed on the allowability of research funds to be used for various research expenses which would be to the detriment of the impact of NSF-funded research. Award terms and conditions, special award provisions, applicable funding opportunities, and recipient internal policy must align with 2 CFR 200, which as we again note, is still not a final rule. We oppose the drastic changes to NSF’s Prior Approval Matrix requiring preliminary compliance with 2 CFR 200. In addition, many essential services previously provided would require pre-approval for recipients of federal funds, adding unnecessary burden and regulatory hurdles to recipients and contradicting NSF’s stated goals of open scientific and engineering communication.

There are additional restrictions on the allowability of indirect costs for research grantees, requiring prospective grantee institutions to negotiate set indirect cost rates, preventing NSF program officers from assisting grantees with indirect cost negotiations, and imposing a default “de minimis” indirect cost cap of 15

percent. These restrictions put additional barriers on prospective grantees from smaller less-resourced institutions to engage in negotiations and put arbitrarily strict limits on how research funds may be used for essential components of the research process that are classified as indirect costs. We call for these indirect cost restrictions to be withdrawn.

Within 2 CFR 200 stipulations, costs related to conference attendance and engagement are no longer freely allowed and must be pre-approved. Professional conferences are an essential avenue for professional development, research proliferation, and peer collaboration. Under 2 CFR 200, researchers would have no reliable way to share NSF-funded findings with their academic peers, preventing access to forums for feedback crucial for refinement, modernization, and efficiency. Additionally, there is no transparency of the process for being granted an exception, a timeline scientists can expect to be approved or denied prior to the event, or a time-sensitive remedial process if denied. The extra time, paperwork, and confusion contradict the goals of the Administration's policies pursuing Gold Standard Science on efficiency and reducing public burden. We urge the withdrawal of all of the proposed changes to Guide 12 of the GFA compared to the associated guide in the current PAPPG.

Guide 25. Section A. – We strongly oppose the GFA's proposed policies for grant termination conditions in Guide 25 and call for its immediate withdrawal. The provision allows for the termination of federal awards to ongoing grants, nullifying years of taxpayer money, time, jobs, and advancement, for reasons such as "changes in priorities." It is critical that NSF research grants are protected for the duration of the grant unfettered from the possible whims of changing partisan control of the Executive and Legislative branches of the Federal government. Political priorities and Administrations may change, but that cannot justify the cancellation of previously awarded grants. It should be noted that NSF used the language "not effectuating agency priorities" as justification for the cancellation of billions of dollars of research grants, a practice that has since been limited by Federal judicial action.

It should also be noted that research grants only retain their value if they are allowed to be completed for their full duration; research grants cancelled prematurely constitute those funds being needlessly wasted. The cancellation of federal funding also leads to the destabilization of institutions and hinders administrators from planning future programs and harms employee retention. The added burden on ongoing grants will lead to severe economic harm. Considering there was an observable [\\$2.8 billion in economic loss](#) due to delays in research grant disbursement, NSF should be mindful of the potential harm of introducing a vague rule with potentially destructive effects on the scientific enterprise.

Regulatory Impact Analysis. – We have noted how the scope of this agency action more closely resembles a regulatory action rather than an information collection. As is necessary for regulatory changes, the replacement of a set of policies as foundational as the PAPPG should not be considered without a proper Regulatory Impact Analysis, which does not appear to have been conducted. In addition, several provisions throughout the GFA would have significant financial implications for prospective and current awardees of research grants. Transitioning to the GFA would further require significant resources on behalf of NSF for staff and enforcement capacity for the new policies. We urge NSF to withdraw the action as an information collection activity until they have completed the necessary steps to issue it as a regulatory action with a complete, detailed Regulatory Impact Analysis to justify its proposed changes.

Sincerely,
The American Political Science Association (APSA)