

Guidance on National Science Foundation's Proposed Changes to its Proposal and Awards Policies and Procedures Guide

Overview

The National Science Foundation has proposed changes to the financial assistance policies and procedures in its Proposal and Award Policies and Procedures Guide, including renaming that document the Guidance on Financial Assistance. This new guidance would prematurely move forward with recent proposed Office of Management and Budget changes to the review and grant-making process for funding research. The public comment period has begun and **will remain open until Aug. 24**.

What's at Stake

In June, the Office of Management and Budget released 420 pages of proposed rule changes that would fundamentally alter what grant proposals and applications will be accepted and would impose an ideological litmus test on scientific research. Specifically, under the proposed rule changes from OMB, research on topics such as race, "gender ideology" and climate change would be at risk of not receiving funding.

The proposed OMB changes have not been finalized, and Congress has paused their implementation until Dec. 11. However, NSF is moving forward with implementing the changes called for in OMB's proposal—an extreme overreach of its authority that will severely undermine scientific research and postsecondary and K-12 science education and further erode the U.S.'s global leadership in scientific innovation and knowledge creation.

What This Means for Science

- The NSF proposal is an **overreach of the agency's authority**. It is an attempt to move forward prematurely with OMB's proposed changes to politicize federal funding for research, making them a reality before the OMB's rulemaking process has concluded and even though Congress has put the brakes on that process.
- The NSF proposal **creates an undue burden on colleges and universities** by imposing additional institutional requirements and by using the information-collection process to impose sweeping regulatory control over institutions of higher education.
- This attempt to **censor research and undermine academic freedom** at colleges and universities will negatively affect the quality of U.S. academic research and science teaching. It is another direct threat to scientific independence, public health and evidence-based decision-making.
- As with the proposed OMB proposal, the NSF changes will lead to **cuts in medical research on lifesaving therapies** for cancer, heart disease, diabetes, Alzheimer's and more.
- Higher education institutions will likely lose researchers and students and have to wind down labs and programs. This is especially true of those that have already faced scrutiny and backlash from the Trump

administration. Without these colleges and universities, and the staff who conduct research, **students and the public will lose opportunities for further career growth and scientific discoveries.**

- The NSF changes have the potential to **undermine local and regional economies**—including college towns and university communities with thriving research hubs, and rural areas and towns with four-year regional institutions and community colleges—leading to job loss on campuses and in communities. The changes could also effectively wipe out community health initiatives created by institutions and their staff, which would cause further hardship.

What You Can Do

Currently, NSF is accepting public comments until Aug. 24. It is critical that we flood the system with public comments expressing our concerns. Widespread opposition to NSF's proposed changes could lead to several positive outcomes:

- These comments could help strengthen a court challenge to the proposed OMB rules.
- NSF could drop the proposed changes.
- This, along with the outpouring of comments on the OMB proposed rules, could encourage Congress to act and make the pause on the OMB rules permanent.

We can all push back on NSF's proposed changes. Anyone, regardless of their occupation, scientific experience or education, is welcome to leave a comment.

How to Leave a Comment

There are two ways to leave comments.

1. Go to the federal government's website for [submitting comments](#) and follow the process outlined there. If you submit comments via the federal website, please share your comments with the AFT at highereddept@aft.org.
2. Stand Up for Science has [launched a campaign](#) to oppose the NSF changes. Like the campaign against the OMB proposal, it includes a link with a space to submit a message, which SUFS will track to ensure all comments are recorded. If you leave comments through the SUFS portal, please include as your affiliated organization (AFT or AAUP).

The comment period has started and will continue until **Aug. 24**. Anyone can submit comments, but they should draw on your experience as an educator, scientist or member of the public.