

## Report on Research Compliance Volume 18, Number 1. January 02, 2021

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◆ **The National Science Foundation (NSF) will be accepting comments on a revised version of its Proposal & Award Policies & Procedures Guide (PAPPG) expected to be finalized sometime next year.** “To facilitate review, revised text has been highlighted in yellow throughout the document to identify significant changes. A brief comment explanation of the change also is provided,” the agency said in a Dec. 14 *Federal Register* notice. In an email to stakeholders, NSF Policy Head Jean Feldman said the draft incorporates “the revised [ 2 C.F.R. § 200 ]: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award that was effective November 12, 2020,” noting that “we have not highlighted the revised references throughout the document.” Feldman also said NSF award conditions currently apply “if there is a discrepancy” between them and the revised 2 C.F.R. § 200 .

The actual draft PAPPG was not included in the *Federal Register* announcement but is available for download from the policy office website. The comment deadline is close-of-business Feb. 12. In her email, Feldman also noted the posting of an updated FAQ about current and pending support requirements in effect now. It appears the document has one new question: #17. It addresses whether a “subawardee on a proposal that was submitted by a prime organization to NSF” should list “the total amount requested for our subaward” or “the total award amount for the overall proposal.” The answer is to list “the award amount requested or received by the subawardee organization.” (12/17/20)

◆ **The Association of American Universities (AAU) is pushing back after a speech by Secretary of State Mike Pompeo at Georgia Tech that the State Department described as “urging American universities to defend against the Chinese Communist Party’s research theft and other threats to academic freedom.”** In a statement responding to Pompeo’s Dec. 9 address, AAU President Barbara Snyder called Pompeo’s comments an “attack” and said his “claim that America’s leading research universities value foreign contracts over the livelihood of our international students, scholars, and researchers is simply wrong.” According to the state department, Pompeo said that “Americans must know how the Chinese Communist Party [CCP] is poisoning the well of our higher education institutions for its own ends. We cannot let the CCP crush the academic freedom that has blessed our country and blessed us with great institutions.” The state department summary also said Pompeo “asked university administrators nationwide to review their receipt of foreign funding to prevent undue financial influence and to review the activities of Confucius Institutes on campus.”

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