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Public Comment: U.S. National Science Foundation Proposal/Award Information-NSF Guidance on Financial Assistance

Agency: National Science Foundation (NSF)

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Subject: Impacts on Ecological Science

Submitted By: Ecological Society of America

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The Ecological Society of America appreciates the opportunity to comment on the proposed update to the National Science Foundation's (NSF) Proposal and Award Policies and Procedures Guide (PAPPG), now to be renamed the NSF Guidance on Financial Assistance (GFA). Ecology and ecosystem science are foundational to U.S. food security, natural hazard preparedness, public health and economic planning. Federal policies that strengthen basic research, the scientific workforce and access to data are essential to sustaining U.S. leadership in science and technology.

ESA, founded in 1915, is the world's largest community of professional ecologists and a trusted source of ecological knowledge, committed to advancing the understanding of life on Earth. The 8,000-member society publishes six journals and a membership bulletin and broadly shares ecological information through policy, media outreach and education initiatives.

While we value the National Science Foundation's (NSF) initiative to streamline and update its proposal and award guidance, the current notice does not provide sufficient detail regarding specific policy additions, revisions, and removals to enable stakeholders to fully assess the practical impact on research administration, award management, or scientific practice.

To foster meaningful public comment and alleviate institutional uncertainty, we respectfully urge NSF to issue a clear comparison of the PAPPG and GFA detailing removed policies, substantive edits, new statutory or regulatory mandates, and the underlying rationale for each major change.

Because many incorporated provisions in the draft GFA appear to originate from external statutes, Executive Orders, or government-wide regulations rather than NSF-specific policy, ESA encourages NSF to clearly identify the legal authority of each requirement. This information would improve transparency, ensure effective implementation and enable institutions to understand their legal and compliance obligations.

Executive Summary

Although the notice does not provide sufficient detail to evaluate every proposed change, the proposed revisions to the NSF guidance on financial assistance that can be identified have significant implications for ecological research, scientific communication, and the long-term value of federal investments in science. Several provisions would introduce new administrative requirements, additional approval processes, and greater uncertainty regarding research funding, collaborations, publication, and dissemination of scientific findings.

Ecological research is not an insular academic pursuit; it provides information and analytical tools that support natural-resource management, agriculture, forestry, fisheries, infrastructure planning, public health preparedness, and environmental stewardship. The proposed revisions raise concerns regarding the integrity of merit-based scientific review, the stability of long-term ecological studies, participation in international research collaborations, dissemination of research through conferences and peer-reviewed publications, and the professional networks that facilitate the transfer of knowledge from research to practice.

ESA submitted comments to the Federal Register to the Office of Management and Budget (OMB) in response to the revisions (2 CFR Part 200, Docket OMB-2026-0034) that will be incorporated into the GFA requirements. In the following text, we provide additional comments to our original OMB comments concerning the proposed NSF GFA, which is intended to pre-align NSF policy with the OMB proposed rule changes. The current status of the OMB rulemaking is unclear, and we urge NSF not to adopt the proposed OMB policies referenced in the draft GFA before the rulemaking process has been completed and final requirements have been established. Below, we list our concerns as they apply to the NSF.

Collectively, the proposed PAPPG changes may reduce the effectiveness of and return on federal investments in ecological research by limiting scientific collaboration, slowing dissemination of research findings, increasing administrative burdens, and creating uncertainty regarding long-term research activities. The following comments identify specific provisions of concern and describe their potential effects on ecological science and the public benefits derived from federally supported research.

Grant review and termination

Relevant sections: Draft GFA Guides 8, 9, and 25 / 2 CFR § 200.205 (Merit Review) and § 200.340 (Termination and Suspension)

- **High-Level Effects:**

- The inclusion of political review in the draft GFA to comply with 2 CFR § 200.205 in award decisions creates a risk that funding determinations could place greater weight on current administration priorities than traditional merit-based scientific peer review, jeopardizing funding for investigator-initiated ecological research.
- Expanded authority for premature grant termination creates a substantial risk of interrupting longitudinal ecological studies that require decades of consistent data.

- **Harm to Science & Enterprise:**

- Independent, idea-driven, investigator-initiated research may be less competitive if award decisions increasingly prioritize alignment with current policy objectives in addition to scientific merit. To the extent that award decisions are viewed as influenced by political considerations, public trust in the independence and objectivity of federally supported scientific research may be diminished if research becomes perceived as influenced by political considerations rather than scientific merit.
- Greater uncertainty regarding availability of awarded funds may limit the ability of research institutions to plan and maintain long-term projects. When studies are terminated prior to completion, earlier federal investments yield less scientific value than anticipated since many ecological questions require uninterrupted observations over extended periods. Reduced reliability in research funding could weaken the U.S. position in international science collaborations as U.S. partners become less attractive in collaborations that rely on stable, multiyear commitments.

- **Jeopardized Benefits:**

- If funding decisions increasingly favor short-term policy priorities over scientific merit (as determined through traditional peer review), fewer resources may be available for foundational research that supports the development and refinement of critical forecasting tools. This puts at risk predictive models for wildlife disease outbreaks, air quality, water quality, wildlife distribution and abundance, and many other management concerns with significant economic impacts.
- Some ecological datasets derive value primarily from continuity. A termination after 15 years of a planned 30-year study can substantially reduce the scientific value of prior investments because trend detection relies on uninterrupted observations. Long-term forestry, watershed and soil monitoring programs provide critical information used by

commercial timber and agricultural industries to assess and forecast long-term soil health and forest productivity.

International Collaborations

Relevant sections: Draft GFA Guides 2, 14, and 22 / 2 CFR § 200.202(e) (Research Eligibility) and § 200.220 (Covered Foreign Collaborations)

- **High-Level Effects:**
 - The proposed restrictions on federally funded international collaborations may impede research on transboundary ecology issues like invasive species, migratory animals, crop pathogens and other aspects of global environmental change.
- **Harm to Science & Enterprise:**
 - Restricted international collaboration may reduce U.S. researchers' access to global talent and international field sites necessary to study ecological processes that extend beyond U.S. borders. It may also reduce U.S. participation in international scientific networks that develop ecological standards, monitoring methods and coordinated research efforts.
- **Jeopardized Benefits:**
 - Many early-warning systems for human and wildlife diseases, invasive plants, and agricultural pests depend on monitoring conditions outside U.S. borders before threats reach domestic ecosystems. Restrictions on international collaboration may reduce the effectiveness of these networks, limiting the ability of agricultural producers, resource managers and public health officials to prepare for emerging threats that affect American crop yields and human health and well-being.

Professional activities

Relevant sections: Draft GFA Guides 12 and 13 / 2 CFR § 200.432 (Conferences), § 200.454 (Memberships and Subscriptions), and § 200.461 (Publication Costs)

- **High-Level Effects:**
 - Conferences are a key mechanism for early dissemination of federally funded research and provide a venue for prepublication feedback from peers that helps shape and improve the research and use of federal funds. Requiring prior approval for conference support may reduce participation in scientific meetings and create administrative barriers for researchers, institutions and scientific societies such as ESA.
 - Professional scientific societies provide important networks for federally funded researchers to engage with practitioners, natural resource

managers, consultants, industry representatives and agency personnel. Requiring prior agency approval for professional memberships may create administrative barriers that reduce participation in these professional communities and limit opportunities for scientific exchange.

- Making journal publication fees unallowable by default except with case-by-case pre-approval creates uncertainty regarding how federally funded research can be disseminated and may delay or complicate publication of research findings.

- **Harm to Science & Enterprise:**

- Conferences provide an important venue for researchers to receive feedback, establish collaborations, and disseminate findings from federally funded research. Requiring prior approval for conference participation may reduce the flexibility researchers need to select the most appropriate venue for presenting their work. Because scientific inquiry is inherently iterative and research outcomes are often unpredictable, researchers may not know at the time an award is made which conference, professional meeting, or target audience will be most relevant to emerging results. Additional approval requirements may also increase administrative burdens for researchers, institutions, and scientific societies such as ESA that facilitate scientific exchange and professional development.
- Professional society memberships support communities of practice that extend beyond an individual researcher's institution and facilitate collaboration among academic researchers, government agencies, private-sector scientists, and resource managers. Additional approval requirements may create administrative delays and reduce participation in these collaborative networks.
- Peer-reviewed publication is the primary mechanism through which federally funded research is validated, archived, cited, and disseminated. Publication fees support editorial oversight, peer-review administration, and maintenance of the scientific record. Additional approval requirements may create barriers to timely dissemination of research results and increase administrative burdens for researchers and institutions.

- **Jeopardized Benefits:**

- Conferences are unique venues where federally supported researchers regularly exchange information directly with natural-resource managers, practitioners, industry representatives, and agency personnel. Unlike journal publications, conferences provide opportunities for rapid dissemination of findings and real-time feedback that can improve ongoing research. Administrative barriers to conference participation may reduce these exchanges, slowing the translation of federally funded research into management practices and other applied uses.

- Through certification programs, technical working groups, professional development opportunities, and scientific networks, professional societies facilitate the transfer of knowledge between research and practice. Reduced participation in these communities may limit opportunities for collaboration and knowledge transfer between researchers and the practitioners, managers and agency personnel who transform federally funded research into tangible public benefits.
- Publication enables research findings, datasets, and analytical methods to become broadly available to researchers, practitioners, resource managers, and policymakers. Delays or barriers to publication may reduce the accessibility and timely dissemination of federally funded research, diminishing the return on public investment in scientific research. For ecological research, such delays may slow the adoption of new science supporting natural-resource management, agricultural productivity, ecosystem restoration, invasive species management, wildlife conservation and climate resilience planning.

Broadening Participation and Workforce Development

Relevant Sections: Draft GFA Guide 19 / 2 CFR § 200.415 ("Required Certifications") & Associated STEM Workforce Provisions

ESA is concerned that the proposed restrictions and compliance certification requirements under Section 200.415 would create uncertainty regarding programs that support scientific workforce development and participation in STEM fields, and in particular, the ecological talent pipeline. By limiting federal fund usage for programs designed to broaden access to STEM, this policy creates severe regulatory uncertainty for institutions, restricting the domestic pool of early-career scientists needed for scientific workforce development. Preserving full funding flexibility for programs that expand access to STEM pathways will help maintain a robust and resilient scientific workforce.

Conclusion

The proposed revisions to NSF's guidance on financial assistance may increase administrative burdens and create uncertainty regarding the conduct, dissemination, and application of ecological research. As discussed above, the provisions raise concerns regarding merit-based scientific review, continuity of long-term ecological studies, international collaboration, scientific meetings, professional networks, and publication of federally funded research.

Collectively, these changes may reduce the effectiveness of and return on federal investments in ecological research by limiting scientific collaboration, slowing dissemination of research findings, and creating uncertainty regarding long-term research activities. Ecological research supports resource management, agricultural productivity, public health preparedness, environmental stewardship, and other public benefits that depend on timely access to reliable scientific information. Maintaining strong, merit-based research systems, effective scientific communication, and productive research partnerships is also essential to sustaining U.S. scientific leadership and ensuring that American science remains globally competitive.

NSF should therefore carefully consider the effects of these provisions on the nation's capacity to generate, disseminate, and apply ecological knowledge for the benefit of the American public. ESA urges the NSF to delay adopting the draft GFA and proposed OMB policies until the underlying OMB rulemaking process has been completed and final requirements have been established. Furthermore, we strongly encourage the NSF to publish a side-by-side comparison of the existing PAPPG and the draft GFA—including all underlying legal and statutory authorities—for public comment.