



## ASA Response to National Science Foundation Comment Request for Proposal/Award Information-NSF Guidance on Financial Assistance

*Prepared under the guidance of the Social Science Statistics Section officers*

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The [American Statistical Association](#) appreciates the opportunity to comment on the [National Science Foundation Comment Request for Proposal/Award Information-NSF Guidance on Financial Assistance](#).

NSF proposes to rename and consolidate its Proposal and Award Policies and Procedures Guide (PAPPG) as the Guidance on Financial Assistance. The accumulated revisions include updates that seem to reflect careful, professional work by NSF staff. We nonetheless urge that this consolidation is premature, that the proposed title works against the interests of the scientific community, and that if NSF proceeds despite these concerns, it should adopt a specific safeguard drawn from standard practice in computationally intensive science.

Given that one of the purposes stated in the NSF draft Guidance on Financial Assistance is to align with the May proposed rule from the Office of Management and Budget, [Regulation for Federal Financial Assistance](#) that is yet to be finalized, NSF's actions are premature. The situation resembles that of a research team nearing the end of a large-scale study: a full manuscript can be drafted in advance, but to circulate or otherwise commit to such a draft before data collection concludes would be to depart from best practice, because early results may not reflect the evidence as it ultimately emerges. NSF's proposed guide should likewise

wait until the proposed rule is finalized, especially given the intense interest and concern by the scientific and broader community.

We also object to the proposed title, Guidance on Financial Assistance. NSF's central function is not simply to disburse funds but to guide and accelerate the scientific enterprise in directions that benefit the nation. By administering a merit-based competition, NSF entices the most effective researchers to devote their talents toward the national scientific vision. A guidance title centered on the financial transaction, rather than the process that justifies it, misrepresents what the guide governs. Should NSF need to revise or supplement the guide again once the proposed rule comments are resolved, having adopted this title in the interim would only add to public cynicism about the scientific process the guide is meant to protect.

Should NSF nonetheless proceed with this release, we recommend it adopt a safeguard that is standard in computationally intensive science: version control. Provisions tied to contested executive orders should be issued as a clearly identifiable, separable set of changes rather than merged indistinguishably into the base document. This would allow NSF to update its guidance quickly should the proposed rule reach a different outcome, without having to unwind the entire guide.

Questions or comments may be directed to ASA Director of Science Policy Steve Pierson: [spierson@amstat.org](mailto:spierson@amstat.org).