Society for Prevention Research (SPR) Response to NSF Guidance on Financial Assistance (NSF–2026–OTR–0001)

On June 24, 2026, the U.S. National Science Foundation (NSF) published a Request for Public Comment on Draft NSF Guidance on Financial Assistance (GFA). NSF is proposing to replace its current Proposal and Award Policies and Procedures Guide (PAPPG) with the GFA as part of the required renewal of its financial assistance information collection under the Paperwork Reduction Act (OMB Control Number 3145-0058). The GFA would serve as NSF's primary policy document governing proposal preparation, award administration, reporting, compliance, research security, and other requirements associated with NSF funding.

The Society for Prevention Research (SPR) appreciates the opportunity to comment on the GFA. SPR is an international, multidisciplinary organization dedicated to advancing prevention research to support a society in which all individuals and communities can succeed. SPR advances scientific understanding of the root causes of social, physical, mental health, and academic problems, and translates that knowledge to prevent or reduce problems and promote health and well-being. We are also committed to the international dissemination of prevention science, including broad access to peer-reviewed published research for scientists, practitioners, advocates, administrators, and policymakers – efforts that strengthen the visibility and global influence of prevention research conducted in the United States. Founded in 1991, SPR includes 700 members worldwide (650 members in the U.S.).

SPR supports NSF's efforts to modernize and clarify its guidance. NSF notes, however, that many of the proposed changes are intended to align agency policy with OMB's proposed Federal Financial Assistance Rule released on May 29, 2026. On July 9, 2026, SPR submitted comments opposing that proposed rule, expressing concern that it could constrain the methods, partnerships, and processes that support rigorous research and evidence use. Because portions of the draft GFA are intended to align with the OMB proposal, SPR believes it is important to assess whether those changes could have unintended adverse consequences for the scientific enterprise and the public value of federally funded research.

SPR's comments focus on how the proposed guidance may influence the generation, dissemination, and use of scientific evidence. To maximize the return on public investments in research, federal policies should support rigorous science while minimizing unnecessary administrative burden on investigators and research institutions.

Purpose and Impact of Prevention Science

At its core, prevention science seeks to (1) identify promotive factors that support healthy development, risk factors that increase the likelihood of adverse health, behavioral, and academic outcomes, and protective factors that reduce the effects of risk; (2) develop and evaluate preventive interventions that address these factors at the individual, family,

school, community, and systems levels; and (3) determine effective strategies for implementation, dissemination, and scalability of these interventions. Through this work, prevention science generates rigorous evidence on the biological, behavioral, social, economic, and environmental processes that shape human development and well-being over time.

Prevention science is closely aligned with many of NSF's investments in its Directorate for Social, Behavioral and Economic Sciences (SBE). The prevention science field draws on and contributes to disciplines such as psychology, sociology, economics, education, anthropology, statistics and data science, and implementation science to better understand how individuals, organizations, and communities function and how policies and programs can produce meaningful societal benefits. By examining factors such as decision-making, social relationships, educational experiences, community conditions, stress, resilience, and exposure to adversity, prevention science advances understanding of the mechanisms that influence life outcomes across different populations and contexts.

Prevention research is essential because many costly social, behavioral, educational, and health challenges emerge gradually over time. By identifying modifiable risks and opportunities for early intervention, prevention science helps inform more effective programs, policies, and systems before problems become more difficult and expensive to address. This work complements basic and applied research by generating actionable evidence about what works, for whom, under what conditions, and at what cost. In doing so, prevention science strengthens decision-making across education, public health, social services, and community systems while enhancing the long-term return on public investments in research.

SPR's Comments

SPR recognizes that the draft GFA contains many positive modernization efforts, including improvements in organization, usability, and clarity. The recommendations below are intended to address specific provisions that may have unintended adverse consequences for the conduct, dissemination, accessibility, or long-term value of federally funded research.

1. Burden, Utility, and Clarity of the Guidance

[G1.B – NSF Guidance on Financial Assistance Overview, p.10-11; G1.C – How to Read the Guides, p. 11; Summary of Changes – Overall Document Changes, p. 6]

SPR supports NSF's efforts to improve the clarity, organization, and accessibility of the GFA. Given NSF's estimate that approximately 43,000 proposals are submitted annually, requiring around 120 hours per proposal for a total estimated public burden of 5.16 million hours per year, improvements that reduce confusion, improve consistency, and make requirements easier to locate have the potential to meaningfully reduce administrative burden and allow researchers to devote more time to scientific activities.

SPR generally supports NSF's redesign of the guidance, including the organization of material by topic rather than chapter, the separation of policies from procedures, and the use of plain language. These changes have the potential to improve navigation and make information easier for investigators, research administrators, and sponsored projects personnel to locate and understand. Continued attention to clear indexing, cross-referencing, and user-centered organization may further improve usability. SPR believes the distinction between responsibilities for Principal Investigators, Authorized Organizational Representatives, and Sponsored Projects Offices is particularly helpful and should be maintained throughout future revisions.

SPR does not have sufficient information to independently assess the accuracy of NSF's estimate that investigators and institutions devote approximately 5.16 million hours annually to proposal preparation and submission. However, SPR encourages NSF to consider whether post-award responsibilities associated with reporting, compliance, research security, public-access obligations, and award administration may create additional burden not fully reflected in proposal-preparation estimates.

SPR also encourages NSF to evaluate burden across the full lifecycle of an award – not only during proposal preparation, but also during award management, reporting, compliance monitoring, public-access activities, research-security requirements, and post-award administration. While many individual requirements may be reasonable in isolation, the cumulative effect of additional disclosure, documentation, reporting, and compliance obligations can be substantial for investigators and research institutions, particularly for early-career researchers and organizations with limited administrative infrastructure.

Where feasible, NSF should leverage automated reporting systems, pre-populated institutional data, interoperability with existing research administration systems, and electronic reporting tools to reduce duplicative data entry and administrative burden. NSF should also avoid requiring the same information to be provided multiple times across proposal, award, and reporting systems.

SPR further encourages NSF to ensure that any new requirements associated with research security, public access, foreign disclosures, reporting, or award administration are implemented in ways that minimize duplication, leverage existing institutional processes whenever possible, and provide clear guidance regarding expectations and compliance.

Ultimately, the success of the revised GFA should be measured not only by whether it simplifies administrative processes, but also by whether it strengthens the ability of researchers to generate, communicate, and apply rigorous scientific evidence for the benefit of society.

SPR supports NSF's overall goal of reducing administrative burden through improved organization, clearer guidance, and elimination of duplicative requirements. The Society's recommendations are intended to ensure that burden reduction efforts do not unintentionally create barriers to dissemination, collaboration, scientific communication, or long-term research continuity.

2. Utility, Quality, and Practical Value of NSF-Funded Research
[Summary of Changes – Overall Document Changes, p. 6; G18.A – Project Reporting (Annual and Final Annual Reports), p. 164; G18B – Project Outcomes Report for the General Public, p. 166]

SPR supports NSF's goal of ensuring that federally supported activities have practical utility and contribute to the advancement of science and society.

For NSF-funded research to achieve its intended public benefit, researchers must be able not only to conduct studies but also to disseminate findings, collaborate with scientific colleagues, participate in professional networks, and communicate evidence to users of research. The scientific value of prevention research is realized when knowledge is translated into improved programs, policies, practices, and future discoveries. Policies that inadvertently restrict these activities diminish the utility and impact of federally funded research and reduce the return on taxpayer investment.

The practical value of research extends beyond the production of new knowledge. Scientific advances generate public benefit when findings can be rigorously evaluated, shared, synthesized, replicated, and applied in real-world settings. Researchers, practitioners, policymakers, educators, and community organizations all play important roles in this process. Maintaining strong connections among these groups helps ensure that federally funded research informs decision-making and contributes to societal progress.

In addition to improving organizational clarity, SPR encourages NSF to provide cross-references, examples, and implementation guidance for complex requirements, particularly in areas related to research security, public access, and award administration. SPR also encourages NSF to consider how proposed policies may influence the broader research ecosystem that supports the generation, dissemination, and use of scientific evidence. Restrictions that reduce opportunities for collaboration, communication, dissemination, or professional engagement may unintentionally slow the translation of research into practice, limit the accessibility of findings, and reduce the long-term impact of federally funded work. When the application of evidence is delayed, decision-makers may be forced to rely on incomplete, outdated, or less rigorous information, reducing the effectiveness of programs, policies, and services and increasing costs.

Over time, weakening the pathways through which evidence is communicated and applied can fragment the evidence base, slow scientific progress, and diminish the return on public investments in research. Conversely, policies that support dissemination, collaboration, transparency, and knowledge exchange strengthen the ability of NSF-funded research to generate broadly relevant, actionable, and societally beneficial knowledge.

SPR agrees that the information collection associated with NSF financial assistance is necessary to support responsible stewardship of federal research investments and has substantial practical utility when it facilitates the generation, dissemination, and application of scientific evidence.

3. Public Access and Dissemination of Research Findings
[G5.H – Data Management and Sharing Plan of the Products of Research, p. 71; G12. C – Indirect Costs, p. 132; G21.B - Copyright, p. 188; G23.A – Publication of Award Materials, p. 192; G23. B – Handling of Information, p.193]

SPR strongly supports public access to federally funded research and NSF's requirement that manuscripts and datasets be deposited in publicly accessible repositories.

However, SPR is concerned that prohibiting publication and open-access expenses while simultaneously expanding public-access expectations creates a disconnect between policy goals and available resources. Publication is not merely an administrative activity – it is a core component of the scientific process through which findings are evaluated, validated, communicated, and ultimately used by researchers, practitioners, policymakers, and the public. Restricting publication support may delay dissemination, reduce accessibility, and undermine the effectiveness of NSF's public-access objectives.

If publication costs are not allowed, federally funded studies may face delays or barriers to dissemination, directly undermining public-access goals and limiting the availability of research needed to develop evidence-based resources that support decision-making. The proposal also appears difficult to reconcile with existing federal policies intended to make the results of federally funded research broadly available to the public. If investigators are expected to provide public access to their findings but are unable to charge journal publication and open-access costs to federal awards, institutions and researchers will face significant challenges in meeting those expectations.

The implications extend beyond researchers. Schools, community organizations, healthcare systems, and policymakers often rely on evidence-based program registries, systematic reviews, practice guidelines, policy briefs, and technical assistance resources built from the peer-reviewed literature. Delays in publication reduce the availability of new evidence for these tools and diminish the overall return on federal research investments.

Similar concerns were highlighted in SPR's response to OMB's proposed revisions to Uniform Guidance submitted on July 9, 2026. SPR recommends that NSF continue to allow reasonable publication and open-access costs as acceptable expenses or establish alternative mechanisms to support compliance with public-access requirements.

4. Research Infrastructure, Scientific Communication, and Professional Engagement
[G4.B4 – Types of Costs, p. 45; G7.G – Conference (Symposia, Workshop, and Study Group) Proposals, p.94; G22.B – Travel, p. 190]

Research infrastructure extends beyond laboratories and datasets. Scientific conferences, professional societies, longitudinal studies, shared data resources, evidence repositories, and collaborative research networks are essential components of the scientific enterprise. Together, they support innovation, interdisciplinary collaboration, workforce development,

scientific transparency, and the generation, dissemination, and application of new knowledge.

This broader conception of research infrastructure is consistent with NSF SBE's mission, which includes supporting infrastructure for the social and behavioral sciences, such as surveys, data resources, and other shared assets that advance scientific discovery. Prevention science relies on this infrastructure to develop, evaluate, synthesize, disseminate, and implement evidence across different populations, settings, and community systems.

Advancing understanding of human behavior, development, learning, decision-making, organizations, and community systems requires opportunities for researchers to exchange ideas, build collaborations, mentor students and early-career investigators, and engage with broader scientific communities. Policies that unintentionally reduce participation in professional societies, scientific meetings, collaborative networks, or other knowledge-sharing activities may weaken the infrastructure that supports scientific progress. Because these activities contribute directly to workforce development, innovation, and the accessibility of scientific knowledge, they should be viewed as essential components of the research enterprise rather than ancillary activities.

Scientific conferences provide a particularly important forum for the rapid sharing, review, and application of new knowledge. They foster interdisciplinary collaboration, connect researchers with practitioners and policymakers, and accelerate the translation of research into practice. Limiting participation in scientific meetings or creating unnecessary barriers to attendance may reduce opportunities for knowledge exchange, slow dissemination of new findings, and weaken the professional networks that support scientific innovation and workforce development.

5. Long-Term Research Continuity and Stewardship of Public Investments
[G11 – Monitoring Project Performance and Changes in Project Direction, pp. 120-127; G17.A – Renewed Support, p. 160; G17.B – Support Under Continuing Grants and Cooperative Agreement Increments, p. 161; G25.A – Suspensions and Terminations, p. 197; G26.B – Post Award Disputes, p. 202]

Many prevention studies require long horizons to evaluate developmental processes, intervention durability, implementation, and population-level outcomes. Longitudinal studies, community partnerships, and large-scale collaborative initiatives often require years of sustained investment before meaningful results can be realized.

SPR is concerned that expanded discretionary termination authorities and the elimination of performance-based renewal mechanisms could increase uncertainty for multi-year research efforts. Abrupt changes in funding stability would reduce the value of prior investments in study development, participant recruitment, data collection, and community partnerships.

Prevention science often relies on longitudinal studies, community partnerships, and multi-year research initiatives that require sustained investment, continuity, and trust. When long-term projects are interrupted before completion, prior investments in study design, staffing, implementation, and participant engagement may fail to produce usable results. Uncertainty regarding continuation or termination of awards may also discourage researchers from pursuing ambitious, long-term projects or addressing complex scientific questions whose value may not be realized within short funding horizons. Such uncertainty is particularly challenging for early-career investigators who depend on stable funding environments to build research programs and contribute to the evidence base.

Maintaining predictable, transparent processes governing award continuation, renewal, suspension, and termination is essential for maximizing the return on public investments in research and ensuring that federally funded projects can generate meaningful scientific and societal benefits. Transparent review processes, clear communication, and appropriate opportunities for response are important for ensuring responsible stewardship of federal research investments and maximizing the public benefit generated by NSF-funded work.

6. International Collaboration and Research Security
[G6.G – International Activities, p. 84; G14.A – Research Security, p. 141; G22.A – Research Activities Outside of the United States, p. 190]

SPR recognizes the importance of protecting national security, safeguarding research integrity, and addressing research-security risks. At the same time, many scientific questions central to NSF's social, behavioral, and economic sciences portfolio – including human development, mental health, substance use, violence prevention, educational outcomes, organizational behavior, community resilience, and the effectiveness of public policies and programs – depend on collaboration across countries, institutions, and scientific disciplines. International partnerships facilitate the exchange of expertise, data, and innovative approaches, while providing access to diverse populations, cross-national data, and shared methodological expertise. Such collaboration is particularly important because many of the social, behavioral, educational, and health challenges examined by prevention scientists are complex, multifaceted, and not confined by national borders.

To the extent that research-security requirements create new constraints on international scientific collaboration, overly broad restrictions on international collaboration risk narrowing the scope of inquiry, reducing the generalizability of findings, limiting innovation, and diminishing U.S. scientific leadership. While other countries continue to invest in global research partnerships, U.S. researchers may face increasing isolation, reducing opportunities to contribute to and shape international research agendas.

SPR supports research-security requirements that are transparent, grounded in demonstrated risks, and proportionate to identified threats. Security policies should address national security concerns while preserving opportunities for international scientific collaboration that complies with applicable disclosure, reporting, and research-security requirements. A targeted, risk-based framework that addresses specific security

concerns while preserving scientific collaboration would better support both national interests and the advancement of science.

7. Transparency, Public Trust, and Evidence Use
[G5.H – Data Management and Sharing Plan of the Products of Research, p. 71; G13.C – Scientific Integrity, p. 139; G13.D – Gold Standard Science, p. 140; G21.B – Copyright, p. 188; G23.A – Publication of Award Materials, p. 192; G23.B – Handling of Information, p. 193]

SPR strongly supports NSF's commitment to transparency and public accountability.

Public trust in science depends not only on public access to publications and datasets but also on rigorous peer review, open communication of findings, evidence synthesis, and opportunities for stakeholders to engage with research. Investments in shared infrastructure, evidence repositories, data resources, and public-facing dissemination strengthen research efficiency, reproducibility, and accessibility. These activities are also consistent with NSF SBE's longstanding role in supporting research infrastructure that enables scientific discovery and informs decision-making. The value of federally funded research depends not only on generating new knowledge, but also on maintaining the systems, resources, and networks that allow that knowledge to be validated, shared, synthesized, and applied.

Federally funded research generates public benefit only when findings can be effectively communicated to those responsible for implementation and decision-making. Researchers must be able to communicate scientific findings accurately and transparently to practitioners, community partners, agency leaders, and policymakers. Such communication is not partisan advocacy; it is an essential component of ensuring that scientific knowledge can be applied to improve programs, policies, and services. Limiting the responsible dissemination of research findings may weaken the connection between evidence generation and evidence use, reduce the visibility and accessibility of federally funded research, and diminish the overall value of public investments in science.

Recommendations

SPR respectfully recommends that NSF:

1. Continue allowing reasonable publication and open-access expenses or provide alternative mechanisms to support public-access requirements. **[G12.B6.3; G21.B]**
2. Preserve support for scientific conferences, professional engagement, and collaborative activities that strengthen research capacity. **[G4.B4; G7.G; G22.B]**
3. Maintain transparent procedures governing award continuation, renewal, suspension, termination, and appeals. **[G17.A–B; G25.A; G26.B]**
4. Implement research security policies using a targeted, risk-based approach that protects national interests while preserving opportunities for international scientific collaboration and exchange that are consistent with applicable research-security requirements and support U.S. leadership in research and innovation. **[G14.A; G6.G; G22.A]**

5. Continue supporting research infrastructure – including data resources, evidence repositories, professional networks, scientific meetings, and dissemination systems – that strengthens the generation, synthesis, accessibility, and practical use of scientific knowledge. **[G5.H; G23.A–B]**
6. Continue efforts to simplify proposal preparation, reporting, and compliance requirements. Given NSF's estimate that institutions and investigators devote approximately 5.16 million hours annually to proposal preparation and submission, reducing unnecessary administrative burden can increase the effectiveness and efficiency of federal research investments. **[G1.B; G1.C; Summary of Changes – Overall Document Changes]**
7. As NSF finalizes the GFA, evaluate proposed changes not only in terms of administrative efficiency, but also in terms of their effects on scientific quality, dissemination, accessibility, collaboration, and the long-term public value of federally funded research. **[G1.B; G1.C; Summary of Changes – Overall Document Changes]**

Conclusion

SPR supports NSF's efforts to modernize and improve the usability of its Guidance on Financial Assistance (GFA). The Society particularly supports the use of plain language, topic-based organization, clearer distinctions between policies and procedures, and other changes intended to improve usability and reduce administrative burden. SPR, however, strongly urges NSF to carefully consider how other proposed changes may adversely affect scientific dissemination, research continuity, international collaboration, transparency, and the broader research infrastructure that supports the generation and application of scientific evidence. By preserving these functions while continuing to reduce unnecessary administrative burden, NSF can strengthen both the efficiency and long-term public value of federally funded research.

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