



FASEB

Federation of American Societies
for Experimental Biology

Representing Over 110,000 Researchers

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December 7, 2023

Suzanne H. Plimpton
Reports Clearance Officer, National Science Foundation
2415 Eisenhower Avenue, Suite E7400
Alexandria, Virginia 22314

FASEB comments Regarding NSF's Notice of Intent to Seek Approval to Establish an Information Collection

Submitted electronically via email: splimpto@nsf.gov

Dear Ms. Plimpton,

The Federation of American Societies for Experimental Biology (FASEB) strongly supports the proposed information collection, announced in the [Federal Register](#) on October 13, 2023, regarding the National Science Foundation's (NSF's) Safe and Inclusive Fieldwork (SAIF) Pilot in Biological Sciences (BIO) and Geosciences (GEO). Representing over 110,000 individual researchers and 26 member societies, FASEB has [consistently championed](#) NSF's ongoing commitment to ensure all research environments are [safe and free of hostile behavior](#).

This proposed information collection aligns seamlessly with two prior NSF-wide anti-harassment policy revisions aimed at fostering safety and productivity in research and educational settings. Notably, as of January 30, 2023, NSF requires certification of a [Safe and Inclusive Working Environment for Off-Campus and Off-Site research plan](#), though these plans are not subject to NSF review. Therefore, FASEB commends the Biological Sciences (BIO) and Geosciences (GEO) directorates for initiating a new pilot program that requires Principal Investigators (PIs) of submitted projects with a fieldwork component to submit a two-page supplementary document summarizing strategies for ensuring a safe and inclusive working environment for associated personnel. Including SAIF plans as part of merit review within the "Broader Impacts" criterion further ensures PIs wholly consider ways to broaden participation and inclusion.

The proposed utilization of surveys and interviews to evaluate the BIO and GEO SAIF pilot will empower NSF to comprehensively examine the effort associated with preparing and reviewing SAIF plans and the overall value of establishing secure and inclusive fieldwork environments. FASEB appreciates NSF's consideration of the administrative burden related to this information collection and its estimation of the associated costs for respondents. The implementation of virtual interviews will substantially alleviate the data collection burden on PIs and (co-PIs) of applicable BIO and GEO proposals. To enhance the effectiveness of the final information collection plan, we strongly recommend incorporating additional trainees, including students and postdocs, alongside PIs for interviews. FASEB commends NSF's commitment to confidentiality, ensuring that information about participants won't be disclosed outside the NSF. However, due to concerns about potential retaliation, we strongly advocate for

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conducting surveys and interviews anonymously. This inclusive approach is essential for a comprehensive evaluation and as well as measuring achievement of [NSF's program and strategic goals](#).

FASEB appreciates NSF's ongoing efforts to broaden participation, empower all STEM communities, and expedite cultural transformation, going beyond mere compliance, as exemplified in the National Academies of Sciences, Engineering, and Medicine (NASEM) [2018 report](#). We look forward to actionable recommendations that may emerge from the proposed data collection and analysis.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary-Ann Bjornsti". The signature is written in a cursive, somewhat stylized font.

Mary-Ann Bjornsti, PhD

FASEB President