

December 28, 2020

Suzanne H. Plimpton  
Reports Clearance Officer  
National Science Foundation  
[splimpto@nsf.gov](mailto:splimpto@nsf.gov)

Dear Suzanne Plimpton:

The Association for Psychological Science (APS) thanks the National Science Foundation (NSF) for the opportunity to respond to its request for information on the topic of evidence-based policymaking (85 FR 63300). Science funding agencies such as NSF have an important responsibility to both (1) consider evidence in their own operations as well as (2) fund or otherwise enable further science on the topic of evidence-building. As the premier agency supporting fundamental, investigator-initiated research, NSF has much to offer in both of these areas.

As a scientific association of approximately 30,000 individuals dedicated to advancing psychological and behavioral research and education, APS members hold valuable evidence-gathering, data analysis, and interpretation skills that are critical to evidence-based policymaking. For this reason, we encourage NSF to involve psychological scientists—and those from the behavioral sciences broadly—in its evidence activities. Members of our field can supplement NSF's own efforts to examine its evidence-building internally, and they can contribute to key NSF extramural scientific programs aimed at better understanding evidence-based governance in general.

Additionally, NSF is encouraged to increase support for the area of behavioral insights, which has promise as a productive, cost-effective discipline that integrates evidence for policymaking. We encourage NSF to consider applying behavioral insights in its own operations and to increase grant support for research in this area, which draws heavily on psychological science principles.

Behavioral insights are already being applied around the world. In the United States, for example, the General Services Administration's Office of Evaluation Sciences (OES) is working to help U.S. agencies develop plans for supporting evidence-based policymaking. At the local level, the Lab @ DC—a scientific team in Mayor Muriel Bowser's administration—applies evidence-based government principles in its day-to-day work. APS urges NSF to collaborate with OES to ensure that findings from behavioral insights are appropriately used. NSF can support a survey of public attitudes towards the use of behavioral insights in government and work to understand the ethics of these approaches.

Psychological scientists can contribute solutions to other ongoing challenges at the intersection of evidence-building and scientific research—such as helping funding agencies and other government groups adopt reproducible and transparent scientific practices, as well as incentivizing these practices and encouraging their adoption.

The NSF is a leader on the topic of evidence generation and analysis in many ways. APS recognizes and commends NSF's Social, Behavioral, and Economic Sciences Directorate for its work in this area, and specifically highlights the work of the National Center for Science and Engineering Statistics (NCSES), a

premier U.S. statistical agency that could play important roles in supporting the agency's efforts to evaluate and analyze evidence.

The NSF must ensure that efforts to increase evidence-building are inclusive of historically disadvantaged groups. Ensuring underrepresented populations are present and considered in the formation of research questions, grant decisions, and in the distribution of research funding is key to making sure decisions are made with the best information available.

Thank you for your consideration of our recommendations. Please do not hesitate to contact APS if we or our members may be of any assistance to you.

Sincerely,

A handwritten signature in blue ink that reads "Robert Gropp". The signature is written in a cursive, flowing style.

Robert Gropp  
Executive Director