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an organization of research universities

COUNCIL ON GOVERNMENTAL RELATIONS

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By email to: splimpto@nsf.gov

November 13, 2012

Suzanna Plimpton
Reports Clearance Officer
National Science Foundation
4201 Wilson Boulevard
Room 295
Arlington VA 22030

Subject: Information Collection: Office of Inspector General Review of
Awardee Implementation of NSF's Requirement for a
Responsible Conduct of Research Program

Dear Ms. Plimpton:

The Council on Governmental Relations (COGR) is an association of 190 research universities and affiliated academic medical centers and research institutes. COGR concerns itself with the impact of federal regulations, policies, and practices on the performance of research conducted at its member institutions. Our members are major recipients of National Science Foundation (NSF) awards and, as such, must comply with all NSF policies in the management of those awards. We appreciate the opportunity to comment on the NSF Office of Inspector General's (OIG) proposed information collection designed to assess whether NSF's policy addressing responsible conduct of research training programs achieves the statutory requirements.

We believe that the data collection strategy as proposed by the NSF OIG exceeds what is necessary to evaluate recipients' compliance with NSF's policy and, as a consequence, creates an unnecessary and excessive burden on the respondents. The NSF policy in Part II, Chapter IV, Part B of the *Proposal and Award Policies and Procedures Guide* (PAPPG), developed to meet the statutory requirements of Section 7009 of the America COMPETES Act of 2007 (PL 110-69, codified at 42 USC 1862o-1), requires an institution to certify at the time of application that: 1) it has a plan in place to provide appropriate training and oversight in the responsible conduct of research to NSF-supported undergraduate and graduate students and postdoctoral researchers; 2) has designated an individual to oversee compliance; and 3) is able to verify the delivery of the training. The plan must be available for review upon request.

As described in the proposed information collection, the NSF OIG outlines interviews with three groups of individuals: senior institutional

administrators; compliance program administrators; and trainees. The notice describes areas for questions for each of these groups of individuals. The OIG proposes to assess institutional commitment to the training program, “including resources and staff,” and the expectations for the program in interviews with senior administrators. Compliance program administrator interviews will focus on areas that include course structure, content, faculty participation and resource allocation. Students and fellows will be asked to evaluate their training experience and examine the benefits and drawbacks of RCR training, in general. The actual questions to be used in the interviews are not available.

We would argue, however, that the interviews, themselves, are not necessary nor useful in determining whether the recipient institution has met the requirements of the policy – having a plan for and providing the training of NSF-supported students and fellows.

The responsible conduct of the research is a fundamental principle at research institutions and institutional commitment to ensuring the integrity of the research enterprise is unwavering. There is a difference, however, between realizing such a commitment and demonstrating compliance with a policy requirement. Thus it may sound glib or disrespectful but the policy does not require institutions to demonstrate a commitment particularly through separately allocated resources – financial and/or personnel – to the program. There is not a required course content or structure nor a requirement that faculty participate in the training activities. We suspect that a one hour interview with 2 course participants is not likely to provide a meaningful assessment of the training program. This interview-based information collection is not a useful or necessary foundation for determining whether NSF awardees are meeting the policy requirements.

The estimated 4 hours of interview time is, in our opinion, underestimated. The brief description of the interviewees and areas of inquiry suggests a uniform training program that is centrally organized and delivered. That model may reflect some institutions plan but it does not reflect all institutional plans. Because NSF provides support across a broad range of disciplines, some institutions have tailored their training programs to include core institution-wide instruction supplemented by discipline specific content and delivery systems. Others have designed decentralized programs that rely on instruction delivered by the faculty within each department. To reasonably achieve the goals of assessing commitment, examining course content, structure, etc., and evaluating the course experience it may involve many more interviews and more time and resources than the NSF OIG estimate.

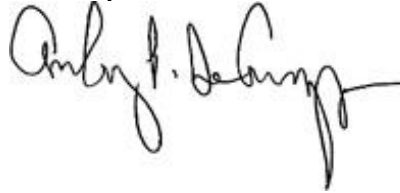
The OIG states that its purpose in the information collection is to determine institutional compliance with the policy requirement “and make recommendations to strengthen these [institutional] programs.” We would argue any such recommendations for strengthening institutional programmatic activities fall outside the OIG responsibilities for ‘promoting economy and efficiency in the administration of, or preventing and detecting fraud and abuse in [NSF’s] programs and operations.’ It is not the OIG’s responsibility to determine whether the institutional programs are effective and we fear such recommendations would not be useful. The NSF OIG lacks the breadth of expertise needed to reasonably assess the effectiveness of individual institutional programs. There is a vast literature and some debate on the most effective ways to provide and to assess education in the responsible conduct of research. We are relatively confident that conducting brief interviews with program participants is not the most effective tool. Thus, the proposed collection goes beyond what is necessary to determine compliance with the policy and, as such, is overly burdensome to the respondents.

We strongly believe there is a much simpler and more direct approach that accurately reflects the policy requirements and the OIG's responsibilities for assessing compliance with the requirement. The NSF OIG should request a copy of the institutional plan for appropriate training and oversight in responsible conduct of research and seek verification through an institutional certification that students and postdoctoral fellows supported by NSF since the implementation of the policy have received training as described in the plan.

The OIG might consider recommending to NSF that it provide support for a grant or cooperative agreement that examines in a more scientific and thorough manner the implementation of the required training program and the outcomes or effectiveness of the programs across the NSF supported community. Such a study would add to the body of knowledge created with NSF support in the past and could offer resources and realistic models for NSF awardees – large and small - that address the challenges with meeting the requirement.

We would urge the NSF OIG to take this simpler and more direct approach.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony P. DeCrappeo". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Anthony P. DeCrappeo
President