

# COGR

an organization of research universities

## COUNCIL ON GOVERNMENTAL RELATIONS

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By email to: [splimpto@nsf.gov](mailto:splimpto@nsf.gov)

March 5, 2013

Suzanne H Plimpton  
Reports Clearance Officer  
National Science Foundation  
4201 Wilson Boulevard, Suite 295  
Arlington VA 22230

SUBJECT: Notice of Intent to Seek Approval to Establish an Information  
Collection System: Grantee Reporting Requirements for the  
Emerging Frontiers in Research and Innovation 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. In this role, we read with some concern the National Science Foundation's intent to seek approval for a reporting system that, as the notice points out, "goes above and beyond the standard reporting requirements used by NSF" and, we would note, all other Federal research sponsors.

Increasing the reporting burden on principal investigators is contrary to every current government-wide effort to reduce regulatory burdens. In December, 2012, the National Science Board (NSB) convened a Task Force on Administrative Burden to examine the regulatory burden imposed on federally supported researchers and offer recommendations for relieving the administrative workload. In establishing the Task Force, the NSB reviewed all the recent activities and reports, including two Executive Orders issued by President Obama, that point to the drain that excessive administrative requirements – including outcome reporting – has on the research enterprise. After a review and inventory of current requirements and consultations with stakeholders, the Task Force will prepare a report and make recommendations to the NSB for reducing administrative burdens. It seems prudent for NSF to delay seeking approval of greatly expanded grantee reporting requirements for the Emerging Frontiers in Research and Innovation (EFRI) program until the NSB Task Force can complete its work.

We recognize that the Emerging Frontiers in Research and Innovation (EFRI) program is a new direction for NSF and we share

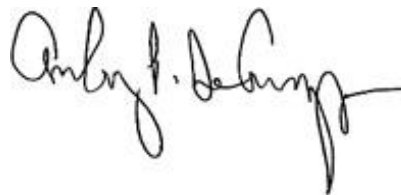
NSF's hope that the program will have its desired outcomes. We cannot support and do not share the belief that the approach outlined in the proposed grantee reporting requirements is critical to the effective management of the program. We fear the resulting burdens in terms of time, costs and logistics greatly outweigh the anticipated benefits.

For example, the requirement for reporting for a period of five years after the award will require institutions to revamp their systems in order to maintain records and documents for a term that violates the current Federal requirement to retain records for three years after the final financial and technical reports are submitted [ 2 CFR Part 215 Reports and Records \_53 (OMB Circular A-110\_53)]. Federal agencies are prohibited from imposing other record retention requirements on recipients, with limited exceptions.

From a simple logistical perspective, ensuring timely and accurate reports will be virtually impossible to achieve for the grantee institutions. If the reporting requirement proceeds as outlined, it would be a term and condition of an EFRI award to the grantee institution, not an individual investigator. As such, the EFRI proposed requirement will be difficult for the grantee to track because most institutional systems track active awards not inactive projects which would be the status of the EFRI award after the four years of funding. How will this requirement affect an institutional grantee if/when the principal investigator leaves the grantee institution? Will NSF expect the grantee institution to "transfer" a non-existent award or isolated term of an inactive award to a new institution? Meeting the requirement will likely require significant changes for the recipient organizations' business systems and, quite likely, a costly investment in the enhancement of information systems. We are not convinced the outcomes are necessary or critical to meeting the goals of the program.

We cannot support this significant change in grantee reporting requirements. At a minimum, we urge NSF to delay seeking the approval for the information collection system for Grantee Reporting Requirements for the Emerging Frontiers in Research and Innovation program until after the NSB Task Force on Administrative Burden has completed its work. AT that time, the value of such a system can be examined in light of the Task Force's findings.

Sincerely,

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

Anthony P DeCrappeo  
President