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OFFICE OF THE PROVOST AND SENIOR VICE PRESIDENT —
ACADEMIC AFFAIRS

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March 15, 2013

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

Submitted via e-mail to: splimpto@nsf.gov

Dear Ms. Plimpton:

RE: Notice of Intent to Seek Approval to Establish an Information Collection
System: Grantee Reporting Requirements for the Emerging Frontiers in Research
and Innovation Program (OMB Number: 3145-NEW)

The University of California system and its ten campuses appreciate this opportunity to provide comments on the National Science Foundation's (NSF) proposed collection of information related to the Emerging Frontiers in Research and Innovation Program (EFRI). The University supports and endorses the comments submitted by the Council on Governmental Relations (COGR) and joins COGR in asking that NSF's proposed collection of information not be implemented.

The University of California system has currently active awards that total over \$12 million in EFRI funding. We are deeply appreciative of this support, which has facilitated the University's continued ability to carry out high quality research in a number of critical areas. We also are committed to complying with the reporting obligations currently outlined in those EFRI awards. As COGR correctly points out, the additional reporting burdens proposed by NSF for the EFRI program go well beyond that of any other federal agency, are counter to the government's effort to reduce regulatory burden and, perhaps most disturbingly, are another instance of an unfunded mandate by a federal agency.

The proposed reporting obligations would require university investigators to report annually for five years after the conclusion of the grant or cooperative agreement. In addition to the practical problems outlined by COGR, compensation for the work involved in preparing and submitting these reports could not be received from NSF, since charges cannot be made against a grant or cooperative agreement once that award has terminated and been closed. Moreover, the additional

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five year reporting requirement is in excess of those stated in 2 CFR Part 215 Reports and Records __.53 (OMB Circular A-110__53). In order to comply with these proposed rules, the University would need to implement separate systems to maintain the retention of these records. Again, implementing and maintaining these systems are not charges that NSF appears to contemplate in the Notice.

Finally, the description of the information to be collected is vague, undefined or seemingly contrary to NSF policy. As examples: What sort of characteristics of project personnel and students would be sought? (Would the University be required to track students for five years after termination of an award even if those students have graduated?) Wouldn't any sources of "complementary cash and in-kind support to an EFRI project" have been described in the application proposal? (Further, wouldn't such support be in violation of NSF's own policy on cost-sharing?) What are "knowledge transfer activities?" (Would that include informal conversations between investigators? And if so, how are those activities to be tracked?)

We understand that the EFRI program is a new direction for NSF and that there is increasing pressure on federal agencies to demonstrate outcomes by establishing metrics. However, the proposed reporting obligations unreasonably burden researchers and research institutions. Should NSF truly need this longitudinal data, we suggest that it fund a separate study to evaluate the EFRI program. At the very least, we join with COGR in requesting that NSF delay seeking approval of this proposal until the NSB Task Force on Administrative Burden has completed its work and the value of such a system can be examined in light of the Task Force's findings.

Thank you for the opportunity to provide comments on NSF's proposal.

Sincerely,



Steven V.W. Beckwith

Vice President for Research and Graduate Studies

cc: Provost and Executive Vice President Dorr