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By email to: splimpto@nsf.gov

June 17, 2013

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

SUBJECT: Notice and Request for Comments: Grantee Reporting
Requirements for the for National User Facilities managed by the NSF
Division of Materials Research

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 (NSF) proposed information collection for National User Facilities managed by the NSF Division of Materials Research.

As we observed in our recent comment on the proposed Emerging Frontiers in Research and Innovation (EFRI) Program information collection, increasing the reporting burden on principal investigators is contrary to every current government-wide effort to reduce regulatory burdens. The National Science Board's (NSB) Task Force on Administrative Burden is in the midst of collecting information from the research community concerning reducing the administrative workload on NSF-supported researchers. We believe it is wise for NSF to delay seeking approval of greatly expanded grantee reporting requirements until the NSB Task Force can complete its work.

We recognize that each NSF division makes a unique and valuable contribution to the advancement of science and the training of future generations of scientists and engineers. The Division of Materials Research (DMR) support of national user facilities makes a significant contribution toward providing access to truly state-of-the-art facilities and we recognize that these complex facilities and the significant NSF investment may require a different level of reporting.

Nonetheless, we are concerned that projected level of reporting will require

June 14, 2013

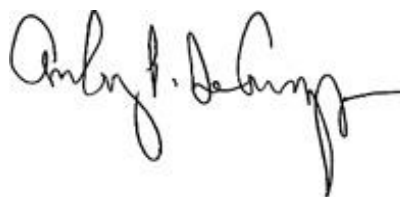
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significant time and resources to compile, and may serve as a disincentive for participation. The current cooperative agreements terms and conditions require grantees to “address progress in all activities of the project.” The annual development of and reporting on quantitative and qualitative management and performance indicators is not an insignificant task. As each facility develops its unique management and performance measures, they will likely vary across the facilities. The Division will be unable to compare facilities across the program. Thus, it is not clear how NSF intends to use the information collected in the proposed reports beyond performance review and a determination of continued funding for each individual facility. Under a cooperative agreement, NSF personnel play a significant and on-going role of project review and assessment throughout the year, and are active participants in planning and program direction. The program officer participates in programmatic, technical and managerial discussions; reviews technical and programmatic reports; and can schedule on-site reviews throughout the life of the project. As such, this on-going review and participation should provide sufficient information to make the funding determination. Absent additional compelling rationales, we fear the resulting burdens in terms of time, costs and logistics greatly outweigh the anticipated benefits.

For example, something as seemingly simple as reporting expenditures by operational component can require changes in the business operations of the host institution. Accounts are not customarily established by operational unit within a single award and will require different and more complex financial systems. Tracking the degree status of students from other, cooperating institutions may prove challenging.

Without a compelling rationale and greater detail concerning the criteria that would be used to assess the management and performance indicators, 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 National User Facilities managed by the Division of Materials Research 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 extending to the right.

Anthony P DeCrappeo
President