

Cooperative State Research, Education, and Extension Service
U.S. Department of Agriculture
OMB No. 0524-0041
CSREES Proposal Review Process

SUBJECT: Supporting Statement for Paperwork Reduction Act Submission to Revise and Extend an Information Collection for the Proposal Review Process

A. JUSTIFICATION

1. CIRCUMSTANCES MAKING COLLECTION OF INFORMATION NECESSARY

The United States Department of Agriculture (USDA), Cooperative State Research, Education, and Extension Service (CSREES) administers competitive, peer-reviewed research, education, and extension programs. The reviews are undertaken to ensure that projects supported by CSREES are of a high-quality and are consistent with the goals and requirements of the funding program. These programs are authorized pursuant to the authorities contained in the National Agricultural Research, Extension, and Teaching Policy Act of 1977, as amended (7 U.S.C. 3101), the Smith-Lever Act, and other legislative authorities.

This information collection is authorized under Sections 3015.158 and 3430.11 of 7 CFR (in attachments) which govern competition in the awarding of discretionary grants and cooperative agreements. 7 CFR 3015.158 sets forward the standard that applications are to be evaluated objectively by independent reviewers in accordance with written criteria set forth by the awarding agency. It also states that reviewers are to make written comments, as appropriate, for each application.

CSREES receives research, education, and extension grant applications each year, of which approximately a quarter are awarded. The majority of these applications are subjected to a rigorous peer-review involving technical experts (scientists, educators, farmers, engineers, extension specialists) located world-wide. Given the highly technical nature of many of these applications, the quality of the peer-review greatly depends on the appropriate matching of the subject matter of the application with the technical expertise of the potential reviewer. CSREES maintains a database of potential reviewers. Information in the database is used to match applications with the most appropriate (potential) reviewers. Therefore, the accuracy of the database content is integral to the success of the CSREES peer review process.

If this information is not collected, it would be difficult for a review panel and CSREES staff to determine which projects warrant funding, or identify appropriate qualified reviewers. In addition, Federal grants staff and auditors could not assess the quality or

integrity of the review, and the writer of the application would not benefit from any feedback on why the application was funded or not.

2. HOW, BY WHOM, AND PURPOSE FOR WHICH INFORMATION IS TO BE USED

The CSREES Application Review Process is accomplished through the use of the CSREES Peer Review System (PRS), A Web-based system which allows reviewers and potential reviewers to update personal information and to complete and submit reviews electronically to CSREES.

Information about potential panel and ad hoc reviewers is collected via an electronic questionnaire. New reviewers are prompted via an e-mail message to complete the questionnaire. The information from the completed questionnaire is loaded into a CSREES database system. The questionnaire collects basic biographical information including address, contact information, and professional expertise. If a reviewer's information is already included in the database, then the questionnaire serves as a request for the potential reviewer to update her/his information. Completing this questionnaire does not commit the respondent to review applications for CSREES.

Information in the database system is used to match applications with the most appropriate (potential) reviewers. The purpose of this information is to obtain current reviewer expertise, contact information, willingness to review, and other biographical information about potential reviewers. This in turn ensures the best possible reviewers are assigned to review applications submitted to CSREES. CSREES program officers can search the expertise information in this database when seeking reviewers for applications. The program officers will not only look for specific technical expertise appropriate to an application, but institutional information in assessing conflict-of-interest and expressed willingness of the potential reviewer to review at that time. Once appropriate reviewers have been selected by CSREES and the reviewer agrees to perform a review, the application and associated materials are then made available to her/him. With respect to the application, a reviewer must assure s/he: (1) will comply with the CSREES Confidentiality Guidelines and (2) does not have a conflict of interest.

Upon completion of a review, the reviewer completes various worksheets in PRS evaluating an application against established criterion providing comments as necessary. If appropriate, a peer panel is convened to review and discuss proposals and make funding recommendations. Once collected this information is used by a panel of external reviewers from various institutions to determine which applications are fundable based on a series of specified criteria. The information is utilized by CSREES staff in selecting and awarding applications to provide feedback to the writer of the application, and by auditors in ensuring the integrity of the review.

3. USE OF IMPROVED INFORMATION TECHNOLOGIES

This information collection does employ the use of improved information technologies. Reviewers are able to maintain their profile information and have the option of submitting reviews through the CSREES Peer Review System (PRS). This is a web based submission tool that accommodates the selection of reviewers, the assignment of applications to reviewers, and permits reviewers to electronically submit ratings and comments. The system has become a critical tool in the CSREES review process.

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION.

Reviewers may have to prepare reviews for more than one application, however each application is unique and the effort is not duplicated. Efforts are made to minimize the number of applications any one reviewer is asked to prepare written reviews of. In addition, CSREES has taken steps to minimize the number of duplicate accounts in our peer review system.

5. METHODS TO MINIMIZE BURDEN ON SMALL BUSINESSES OR OTHER SMALL ENTITIES.

Most reviewers are from colleges and universities, although some employees of small businesses are asked to review for some programs. The Small Business Innovation Programs however does not allow reviewers from for-profit institutions to participate in the review of applications, which has the benefit of reducing burden on small business entities.

Respondents are individuals and all responses are voluntary. Reviewers can decline any request to serve on review panels or review individual applications outside of a panel. In addition, CSREES uses an electronic system to monitor application assignments to ensure individual reviewers are not over burdened.

Therefore, this collection should have trivial impact on small businesses or entities.

6. CONSEQUENCES IF INFORMATION COLLECTION WERE LESS FREQUENT.

To insure the highest quality of funded research, CSREES must collect reviews in a timely manner and on an individual application basis. If this information was not collected and documented, the decision to fund a particular application could be questioned.

In addition, because of the rate of change of science and thus scientific expertise, the need to have correct contact information, and the need to update willingness to review (which can be fluid based on events in the potential reviewer's life and career), respondents must be asked to complete a questionnaire annually.

7. SPECIAL CIRCUMSTANCES FOR INFORMATION COLLECTION.

There are no special circumstances for this information collection. This collection is consistent with the regulation at 7 CFR 3015.115 authorizing its use.

- Requiring respondents to report information to the agency more often than quarterly:

The agency does not require respondents to report information more often than quarterly.

- Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

Response is voluntary and respondents have more than 30 days to reply.

- Requiring respondents to submit more than an original and two copies of any document:

Only one response is requested and is collected electronically.

- Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

Respondents are not required to retain records in response to this request.

- In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;

This information collection does not include statistical surveys.

- Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

This information collection does not require the use of statistical data classification that has not been reviewed and approved by OMB.

- That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use;

This information collection does not require a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or

which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

- Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

This information collection does not require respondents to submit proprietary trade secret, or other confidential information.

8. FEDERAL REGISTER NOTICE, SUMMARIZATION OF COMMENTS AND CONSULTATION WITH PERSONS OUTSIDE THE AGENCY.

Notice of intent to revise this information collection was published in the *Federal Register* on August 4, 2008, 73 FR 45205. One comment was received but it did not address the use, clarity, or accuracy of the burden estimates.

9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS.

Payments or gifts are not given to any respondents for completing the information collection. Participation in this collection is voluntary. However, panelists are compensated with an honorarium for the time they spend in panel.

10. CONFIDENTIALITY PROVIDED TO RESPONDENTS.

Verbatim but anonymous copies of review comments are sent to the principal project director for each application. Subject to CSREES policy and applicable laws, reviewers' comments and names will be kept confidential to the extent permitted by law. The notice requesting respondents to complete the questionnaire includes a privacy information notice.

Every reviewer assures, in the Peer Review System, prior to preparing a review that they do not have a conflict of interest with a particular application and will maintain its confidentiality.

11. QUESTIONS OF A SENSITIVE NATURE.

This collection does not ask respondents questions of a sensitive or individual nature.

12. ESTIMATE OF BURDEN.

The burden estimates for the three components to the CSREES review process are as follows.

Estimates for the Proposal Review Sheet and Reviewer Worksheet combined:

Estimated number of respondents:	12,600
Estimated number of responses per respondent:	1
Estimated number of annual responses	12,600
Estimated burden in hours per response	6
Estimated total annual burden on respondents:	75,600 hours

Estimates for the Reviewer Questionnaire:

Estimated number of respondents:	14,500
Estimated number of responses per respondent:	1
Estimated number of annual responses	14,500
Estimated burden in hours per response	.17 hour
Estimated total annual burden on respondents:	2,465 hours

Total estimated annual burden for the CSREES Review Process: 78,065 hours

The names and contact information for 3 people surveyed for the burden estimates are below.

Penny Swanson
Penny.swanson@noaa.gov

Ramesh Ramachandran
rameshr@psu.edu

Carol Bagnell
bagnell@aesop.rutgers.edu

TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS.

Based on an average faculty hourly wage of \$47.30, CSREES estimates the total annual cost burden to respondents for the value of their time to participate in the CSREES review process to be \$3,692,474.

The hourly wage was derived from the American Association of University Professors 2007-2008 Faculty Salary Report data. The average faculty salary of \$75,677 was used for a 10 month associate level professor.

13. START-UP COSTS

There are no start-up or capital costs incurred by respondents of this collection.

14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT.

CSREES estimates the total annual cost to the agency for the collection of this information to be \$3,829,000 which includes staff time in reviewing and managing the information, panel costs, and system maintenance.

15. REASONS FOR CHANGES IN BURDEN.

The total annual burden for the CREES Review Process has changed from the previously approved total of 100,497 hours to the new requested amount of 78,065 hours. This is principally the result of adjustments in the number of respondents as well as program changes.

A program change has been made to eliminate the hard copy Conflict of Interest and Confidentiality Certification Form and use the electronic assurance provided through the Peer Review System. This resulted in a reduction of 167 hours from the previous total.

Adjustments were made to the number of respondents as well. There are approximately 14,500 active reviewers as opposed to the previously estimated 50,000 reviewers. This adjustment resulted in a decrease of 5,865 hours from the total for the Reviewer Questionnaire. The reason for this is CSREES has made efforts to close inactive accounts and reduce duplicate records.

For the Proposal Review Sheet the number of responses was adjusted to reflect a decreased from the previously estimated 18,400 responses to 12,600 responses as well as an increase in the time per response by one hour. This adjustment resulted in a decrease of 16,400 hours.

In all, there is a decrease of 22,265 as a result of a program adjustment and a decrease of 167 hours as a result of program changes.

Instrument	Previous Burden	Requested Burden	Change in burden
Review Sheet	92,000	75,600	Decrease 16,400
Reviewer Questionnaire	8,300	2,465	Decrease 5,865
Conflict of Interest and Confidentiality Certification Form	167	0	Decrease 167
Total	100,497	78,065	Decrease 22,432

16. TABULATION, ANALYSIS AND PUBLICATION PLANS.

The information collected is not planned for publication. It is used solely to administer CSREES programs.

17. REASONS DISPLAY OF EXPIRATION DATE OF OMB APPROVAL IS INAPPROPRIATE.

CSREES will display the OMB approval number on the Peer Review System. The OMB approval number does not exist on the “

18. EXCEPTIONS TO 83-I CERTIFICATION STATEMENT.

A certification of exception is not requested.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Information to be collected does not employ statistical methods.

Attachments

7 CFR 3015.115

7 CFR 3430.11

7 CFR 3015.115

Sec. 3015.158 Competition in the awarding of discretionary grants and cooperative agreements.

(a) Standards for competition. Except as provided in paragraph (d) of this section, awarding agencies shall enter into discretionary grants and cooperative agreements only after competition. An awarding agency's competitive award process shall adhere to the following standards:

(1) Potential applicants must be invited to submit applications through publications such as the Federal Register, professional trade journals, agency or program handbooks, the Catalog of Federal Domestic Assistance, or any other appropriate means of solicitation. In so doing, awarding agencies should consider the broadest dissemination of project solicitations in order to reach the highest number of potential applicants.

(2) Applications are to be evaluated objectively by independent reviewers in accordance with written criteria set forth by the awarding agency. Reviewers should make written comments, as appropriate, on each application. Independent reviewers may be from the private sector, another agency, or within the awarding agency, as long as they do not include anyone who has approval authority for the applications being reviewed or anyone who might appear to have a conflict of interest in the role of reviewer of applications. A conflict of interest might arise when the reviewer or the reviewer's immediate family members have been associated with the applicant or applicant organization within the past two years as an owner, partner, officer, director, employee, or consultant; has any financial interest in the applicant or applicant organization; or is negotiating for, or has any arrangement, concerning prospective employment.

(3) An unsolicited application, which is not unique and innovative, shall be competed under the project solicitation it comes closest to fitting. Awarding agency officials will determine the solicitation under which the application is to be evaluated. When the awarding agency official decides that the unsolicited application does not fall under a recent, current, or planned solicitation, a noncompetitive award may be made, if appropriate to do so under the criteria of this section. Otherwise, the application should be returned to the applicant.

(b) Project solicitations. A project solicitation by the awarding agency shall include or reference the following, as appropriate:

(1) A description of the eligible activities which the awarding agency proposes to support and the program priorities;

(2) Eligible applicants;

(3) The dates and amounts of funds expected to be available for awards;

(4) Evaluation criteria and weights, if appropriate, assigned to each;

(5) Methods for evaluating and ranking applications;

(6) Name and address where applications should be mailed and submission deadline(s);

(7) Any required forms and how to obtain them;

- (8) Applicable cost principles and administrative requirements;
- (9) Type of funding instrument intended to be used (grant or cooperative agreement); and
- (10) The Catalog of Federal Domestic Assistance number and title.

(c) Approval of applications. The final decision to award is at the discretion of the awarding/approving official in each agency. The awarding/approving official shall consider the ranking, comments, and recommendations from the independent review group, and any other pertinent information before deciding which applications to approve and their order of approval. Any appeals by applicants regarding the award decision shall be handled by the awarding agency using existing agency appeal procedures or good administrative practice and sound business judgment.

(d) Exceptions. The awarding/approving official may make a determination in writing that competition is not deemed appropriate for a particular transaction. Such determination shall be limited to transactions where it can be adequately justified that a noncompetitive award is in the best interest of the Government and necessary to the accomplishment of the goals of the program. Reasons for considering noncompetitive awards may include, but are not necessarily limited to, the following:

- (1) Nonmonetary awards of property or services;
- (2) Awards of less than \$75,000;
- (3) Awards to fund continuing work already started under a previous award;
- (4) Awards which cannot be delayed due to an emergency or a substantial danger to health or safety;
- (5) Awards when it is impracticable to secure competition; or
- (6) Awards to fund unique and innovative unsolicited applications.

(51 FR 17172, May 9, 1986)

§ 3430.11 Competition.

(a) *Standards for competition* . Except as provided in paragraph (b) of this section, CSREES will enter into grants and cooperative agreements, unless restricted by statute, only after competition.

(b) The CSREES ADO and the Agency approving official may make a determination in writing that competition is not deemed appropriate for a particular transaction. Such determination shall be limited to transactions where it can be adequately justified that a noncompetitive award is in the best interest of the Federal government and necessary to the goals of the program.