Supporting Statement
Information Collection Request for a
Uniform Research Performance Progress Report (RPPR) Format
Submitted by
The National Science Foundation (NSF)

A. **JUSTIFICATION**

1. **CIRCUMSTANCES MAKING COLLECTION OF INFORMATION NECESSARY**

~~The Research Performance Progress Report (RPPR) will directly benefit award recipients by making it easier for them to administer Federal grant and cooperative agreement programs through standardization of the types of information required in interim performance reports— thereby reducing their administrative effort and costs. The RPPR also will make it easier to compare the outputs, outcomes, etc. of research programs across the government.~~

The Research Performance Progress Report (**RPPR**) **resulted from an initiative of the Research Business Models (RBM) Subcommittee of the Committee on Science (CoS), a committee of the National Science and Technology Council (NSTC). One of the RBM Subcommittee's priority areas is to create greater consistency in the administration of Federal research awards. Given the increasing complexity of interdisciplinary and interagency research, it is important for Federal agencies to manage awards in a similar fashion.** With issuance of the OMB/OSTP Policy Letter, Subject: *Policy on Research Performance Progress Report*, dated 04/21/10, ~~Upon implementation,~~ **the RPPR will be used by agencies that support research and research-related activities for use in submission of interim progress reports.** ~~It is intended to replace other interim performance reporting formats currently in use by agencies.~~ **The RPPR does not change the performance reporting requirements specified in 2 CFR Part 215 (OMB Circular A-110) and the** Grants Management **Common Rule implementing OMB Circular A-102._**

The purpose of this information collection request is to replace NSF's existing electronic annual project report format in the NSF FastLane system with the RPPR format approved for use by OMB/OSTP.

~~Each category in the RPPR is a separate reporting component. Agencies will direct recipients to report on the one mandatory component ("Accomplishments"), and also may direct them to report on optional components, as appropriate. Within a particular component, agencies may direct recipients to complete only specific questions, as not all questions within a given component may be relevant to all agencies. Agencies may develop an agency- or program-specific component, if necessary, to meet programmatic requirements, although agencies should minimize~~

the degree to which they supplement the standard components. Such agency- or program-specific requirements will require review and clearance by OMB.

Agencies also may use other OMB-approved reporting formats, such as the Performance Progress Report (PPR), if those formats are better suited to the agency's reporting requirements, for example, for research centers/institutes, clinical trials, or fellowship/training awards or in connection to reporting on program performance. ,

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

On behalf of the RBM Subcommittee, and the Federal agencies that have provided burden estimates, the National Science Foundation (NSF) has agreed to serve as sponsor of this new format.

The RBM Subcommittee's objectives include:

- Facilitating a coordinated effort across Federal agencies to address policy implications arising from the changing nature of scientific research; and
- Examining the effects of these changes on business models for the conduct of scientific research sponsored by the Federal government.

The Subcommittee used public comments, agency perspectives, and input from a series of regional public meetings to identify priority areas on which it would focus its initial efforts. In each priority area, the Subcommittee is pursuing initiatives to promote, as appropriate, common policy, streamlining of current procedures, or the identification of agencies' and institutions' ''best practices.'' As further information about initiatives becomes available, it will be posted at the Subcommittee's website at: http://rbm.nih.gov.

One of the RBM Subcommittee's priority areas is greater uniformity in the form and content of performance reports that are required by Federal grants and cooperative agreements awarded under research programs. Many Federal agencies have their own forms or formats that recipients must use to report progress on activities supported by research awards. While agencies use different formats and different language to request information on progress, they generally collect similar information. These variations increase the administrative effort and costs for recipients of Federal awards, and make it difficult to compare the outputs, outcomes, etc., of research programs across the government. The RPPR format will increase uniformity of content across Federal research agencies.

The RBM Subcommittee reviewed forms and formats currently in use by Federal agencies for reporting performance on research grants. The reporting categories used by the NSF were selected as a starting point for designing a standard format, as hundreds of NSF research programs have used these categories successfully. The RPPR does not change the performance reporting requirements specified in 2 CFR Part 215 (OMB Circular A-110) and the Grants Management Common Rule implementing OMB Circular A-102; it merely provides additional clarification, instructions, and a standard format for collecting the information.

The RPPR is intended for use in submission of interim progress reports, not for use in submission of final reports, and it is intended to replace other formats currently in use by agencies supporting research and research-related activities. The RBM Subcommittee plans to undertake development of a final Research Performance Progress Report format upon completion of the interim RPPR exercise. **The RPPR addresses progress for the most recently completed period, at the frequency required or designated by the sponsoring agency. Information, once reported,** will~~may~~ **not have to be provided again on subsequent reports.** ~~;~~

~~if an agency has implemented an electronic solution for submission of progress reports. However, upon implementation, agencies may use this format in either paper copy or in electronic form.~~

As approved by OMB/OSTP, the RPPR consists of one mandatory component, Accomplishments, and the following optional components:

- Products
- Participants & Other Collaborating Organizations
- Impact
- Changes/Problems
- Special Reporting Requirements
- Budgetary Information
- Demographic Information for Significant Contributors

~~Each category in the RPPR is a separate reporting component. Agencies will direct recipients to report on the one mandatory component ("Accomplishments"), and may also direct them to report optional components, as appropriate. Recipients will not be required or expected to report on each of the questions or items listed under a particular category. They will be advised to state "Nothing to Report" if they have nothing significant to report during the reporting period. Within a particular component, agencies also may direct recipients to complete only specific questions, as not all questions within a given component may be relevant to all agencies.~~

~~Agencies will utilize the standard instructions that have been developed for each category, but may provide additional program-specific instructions necessary to clarify a requirement for a particular program. For example, the Environmental Protection Agency (EPA) is required to collect information on environmental impacts; so EPA can direct recipients to report on the research's benefit to the environment or human health under the following reporting question: "How has the project contributed to society beyond science and technology?"~~

~~Agencies may develop additional agency- or program-specific reporting components and instructions (e.g., the National Institutes of Health may need to collect information on clinical trials in certain types of awards); however, to maintain maximum uniformity, agencies will be instructed to minimize the degree to which they supplement the standard categories. Such agency- or program-specific requirements will require review and clearance by OMB.~~

~~Agencies also may use other OMB-approved reporting formats, such as the Performance Progress Report (PPR), if those formats are better suited to the agency's reporting requirements, for example, for research centers/institutes, clinical trials, or fellowship/training awards or in connection to reporting on program performance. ,~~

Potential respondents include public or private institutions of higher education, other research organizations, ~~,~~ **such as** ~~universities, colleges,~~ **hospitals, and laboratories; units of**

state and local government; ~~domestic or foreign non-profit and for-profit organizations;~~ **and eligible agencies of the Federal government.** ~~Note that affected public will vary depending on individual agency and the type of research being supported.~~

3. **USE OF AUTOMATION**

~~As noted above, and reiterated here, the RPPR is intended for use in submission of interim progress reports, not for use in submission of final reports, and it is intended to replace other formats currently in use by agencies supporting research and research-related activities. The RBM Subcommittee plans to undertake development of a final Research Performance Progress Report format upon completion of the interim RPPR exercise. The RPPR addresses progress for the most recently completed period, at the frequency required or designated by the sponsoring agency. Information, once reported, may not have to be provided again on subsequent reports, if an agency has implemented an electronic solution for submission of progress reports. However, upon implementation, agencies may use this format in either paper copy or in electronic form.~~

In 2005, the Office of Management and Budget (OMB) selected NSF to lead a research-focused grants consortium as part of the Grants Management Line of Business initiative. OMB selected NSF to lead this initiative for the research community because of NSF's:

- **Focus on the research community**
- **High standards and performance to its customers**
- **Leadership position in the grants community**

Led by the National Science Foundation (NSF), Research.gov is an initiative that provides a menu of services tailored to the needs of the research community. Research.gov is a modernization of the FastLane system that provides next generation grants management capabilities to carry out NSF and partner agencies' research missions by enabling organizations and grantees to access a menu of grants management services for multiple federal agencies in one location. Research.gov will continue to develop and implement grants management service offerings that fulfill demand in the research community and expand services for other federal agencies, and the RPPR will be developed as one of those service offerings. It is NSF's intention to develop a new capability in Research.gov for submission of the RPPR.

4. **EFFORTS TO IDENTIFY DUPLICATION**

The National Science and Technology Council, through the Committee on Science (CoS), Research Business Models (RBM) Subcommittee, asked for public comments on federal policies and procedures related to business practices that could be changed to improve the efficiency, effectiveness, and accountability of the nation's research enterprise. One issue raised was inconsistency in interim research progress reporting among Federal agencies. To address the issue, the RBM Subcommittee, with the approval of the CoS, developed a standardized reporting format: the Research Performance Progress Report (RPPR).

The RPPR is intended for annual or interim research progress reporting. The subcommittee proposed the draft RPPR format for comment in the Federal Register [Volume 72, pages 63629-63631, November 9, 2007] and considered all comments in developing the final RPPR format. The RPPR format was also supported by the Chief Financial Officers Council Grants Policy Committee. The RPPR format is intended to replace other interim performance reporting formats currently in use by agencies. The RPPR does not change the performance reporting requirements specified in 2 CFR Part 215 (OMB Circular A-110) and the Grants Management Common Rule implementing OMB Circular A-102. The RPPR will be used by agencies and awarding offices that support research and research-related activities for use in submission of interim performance reporting on grants and cooperative agreement awards. The standardized RPPR format is intended to replace other performance reporting formats currently in use by agencies supporting research and research-related activities.

5.
6. **The RPPR resulted from an initiative of the RBM Subcommittee.** ~~One of the RBM Subcommittee's priority areas is to create greater consistency in the administration of Federal research awards. Given the increasing complexity of interdisciplinary and interagency research, it is important for Federal agencies to manage awards in a similar fashion. Upon implementation, the RPPR will be used by agencies that support research and research-related activities for use in submission of interim progress reports. It is intended to replace other interim performance reporting formats currently in use by agencies.~~

7.
8. SMALL BUSINESS CONSIDERATIONS

Not applicable.

9. CONSEQUENCES OF LESS FREQUENT COLLECTION

Not applicable.

10. SPECIAL CIRCUMSTANCES FOR COLLECTION

There are no special circumstances for this collection.

11. FEDERAL REGISTER NOTICE/OUTSIDE CONSULTATION

The National Science Foundation (NSF), on behalf of the National Science and Technology Council's Research Business Models Subcommittee, proposed the draft RPPR for comment in the Federal Register [Volume 72, pages 63629-63631, November 9, 2007]. 347 public comments were received from a wide variety of respondents, including six institutions of higher education; three associations of academic and nonprofit institutions; components of six Federal agencies; and one individual. All comments were carefully considered in developing a final version of the RPPR. The majority of public comments strongly supported the overall proposal to create a government-wide standard RPPR, citing the advantages of increased consistency in Federal agencies' reporting requirements. A number of specific issues were raised, and those comments and responses are summarized below:

Comment: **Four Federal and six university commenters questioned the process for development and implementation of the RPPR.**

Response: **When the RBM Working Group was initially formed in 2004, it examined existing research progress reports with the intent of standardizing the reporting requirements across agencies. Once a draft was developed, the RPPR Working Group requested comments and modified the format based on the comments. Once final, NSF (on behalf of the National Science and Technology Council's Research Business Models subcommittee) will send the RPPR to OMB for clearance as part of the Paperwork Reduction Act (PRA) process. The RPPR Working Group will develop guidance and training as part of the implementation.**

Comment: **Nine Federal commenters requested additional data elements associated with project budgets.**

Response: **Agree. A new, optional "Budget" section of the format was created.**

Comment: **Six Federal commenters requested additional data elements to comply with agency special reporting requirements on things such as clinical trials.**

Response: **Agree. An optional "Special reporting requirements" section of the format was added.**

Comment: **One Federal commenter requested the addition of a data element capturing changes in project/performance site.**

Response: **Agree. A "Change of primary performance site location" data element was added.**

Comment: **Five Federal commenters requested the inclusion of contact information and signature for the authorized official submitting the report, as well as date of submission.**

Response: **Agree. Data elements to capture the electronic or hard copy signature and contact information of the authorized official and date of submission were added and are expected to be captured as part of the electronic implementation solution.**

Comment: **60 Federal commenters requested additional data elements to meet agency–specific requirements.**

Response: **No change. The information is either already captured in the report, or the proposed data element would go beyond the scope of the report, potentially increasing grantee burden and confusing users. Agencies may pursue developing agency-specific requirements through OMB. However, every attempt was made to minimize the need for agency-specific requirements.**

Comment: **Seven Federal commenters expressed concern that the format would not be adequate for an agency's reporting requirements, especially in regards to reporting on PART.**

Response: **Agencies may consider using the Performance Progress Report (PPR) in lieu of the RPPR. The PPR has a specific section for reporting on the Program Assessment Rating Tool. Agencies also may pursue developing agency-specific requirements through OMB.**

Comment: **29 Federal, nine university, and four association commenters noted the use of current agency data collection systems and the need to develop a new, electronic, web-based solution for research performance progress reporting.**

Response: **All electronic system implementation comments received in response to the Federal Register Notice will be forwarded to the Grants Executive Board and the Grants Management Line of Business for dissemination to appropriate agency contacts for further**

consideration However, upon implementation, agencies may use this format in either paper copy or in electronic form.

Comment: One Federal and five university commenters suggested that agencies be able to pre-populate the report with data from the grants.gov application.

Response: The information collected on Grants.gov and in grant applications would not be appropriate for the RPPR because the information often changes between application and award.

Comment: One Federal commenter requested the development of a standard taxonomy for types of projects.

Response: Keeping an updated list would be extremely time consuming and difficult. However, if an agency or group develops a standardized taxonomy, the RPPR Working Group will consider incorporating this taxonomy in a future update to the format.

Comment: Four Federal commenters suggested page and word limits for report responses.

Response: This is a format, not a form. Agencies can define page and word limits when appropriate.

Comment: 48 Federal and six university commenters requested clarifications regarding the type of data requested and the purpose of each section in the instructions.

Response: Agree. The instructions were amended to clarify the type of data requested and the purpose of each section, where necessary.

Comment: Ten Federal commenters questioned the broad applicability and order of the proposed format.

Response: The RPPR is intentionally broad to create maximum flexibility, allowing agencies to use it for all research and research-related programs. The standardized instructions were developed to ensure consistency across agencies wherever possible. There is no prescribed order to the format because the order will depend on which sections an agency determines to be mandatory.

Comment: Four Federal and five association commenters questioned the intent of and need for the demographic information in the "Participants" section

Response: The demographics information being requested is based on government-wide standard categories currently in use on a variety of forms. The demographics being requested only pertain to the people who have directly worked on the award. This section is optional and if another institution has regulations preventing its reporting, the award recipient may choose not to provide such data. While demographic data will be used by agencies for data analysis and reporting, it will not be used by agencies as part of the progress report evaluation.

Comment: Six Federal and one association commenters requested a clearer indication of which paid persons an award recipient should report on and clarification of 'person months' in the "Participants" section

Response: Agree. Language was added to the instructions.

Comment: Three Federal and one university commenters proposed the use of "None" or "Nothing to report" vs. allowing an award recipient to leave a box blank.

Response: Agree. "Nothing to report" is more accurate and was added. A blank field could represent "nothing to report" or a spot that the awardee forgot to fill in.

Comment: Eight Federal, four university, and two association commenters expressed concern about the potential burden the report might create.

Response: The burden was carefully considered during the development of the RPPR. Depending on how it is implemented by each agency, the RPPR may request more extensive data than are currently collected; but both agencies and award recipients will receive better information. As with any standardization effort, there may be a short term

burden increase in order to produce a long-term gain. Finally, while there may be additional burden on the first report for the project, assuming an electronic solution, the next form could potentially be pre-populated with information that carries over, leading to a burden reduction.

Comment: Four Federal commenters noted apparent redundancy of data elements across different sections of the report.

Response: Each section captures different types of data. Any apparent redundancy is intentional to ensure agencies using only a select few of the optional sections capture the necessary data.

Comment: One Federal commenter questioned the need for invention, patent, and license information, since it is already captured elsewhere by many agencies.

Response: The purpose of this section is to provide the agency program officer with a record of all that has occurred within the reporting period, including patents.

Comment: 26 Federal, four university, and two association commenters questioned the distinction between the mandatory and optional sections of the form.

Response: Only the "Accomplishments" component of the RPPR format is mandatory, while the other components are for optional use at the discretion of the agencies. The Federal awarding agency determines which categories are mandatory or optional for the award recipient to complete. This should be determined as early as possible, preferably at the time the funding opportunity is issued. As information required can vary between agencies and programs, the combination of mandatory and optional sections provides agencies the maximum flexibility to collect only the information they specifically require.

Comment: One Federal commenter asked whether the RPPR would be required in addition to the PHS 2590.

Response: The RPPR would replace the PHS 2590. Information not collected as part of the RPPR could be requested through the optional agency-specific categories.

Comment: Three Federal commenters asked for a clear definition of research--which programs are considered research or research-related programs?

Response: It is up to the agencies to determine which programs are research or research-related programs.

Comment: Four Federal and one university commenters requested language stating that the RPPR should not be used as the vehicle for seeking prior approvals and/or fulfilling invention reporting requirements.

Response: Agree. Appropriate language was added to the RPPR.

Comment: 25 Federal, five university, and one association commenters offered suggestions regarding the development of a Final Report format.

Response: These comments will be considered after the development and implementation of the RPPR has been completed.

12. GIFTS OR REMUNERATION

Not applicable.

13. CONFIDENTIALITY PROVIDED TO RESPONDENTS

~~Each Federal grant-making agency~~NSF will maintain the authoritative copy of all performance progress reports in Research.gov~~.~~ Collection of information will be consistent with the content and instructions specified in the RPPR as approved by OMB/OSTP ~~policies related to the administration of Federal grants as well as agency policies and practices for access~~

to electrical and paper records. . If progress reports are submAs stated above, it is NSF's intention to require all of the RPPR components, except budgetary. This information is currently required as part of NSF's progress report format in the NSF FastLane system. itted through the Research.gov report submission mechanism, research.gov will maintain only transmission records pertaining to the files.

14. QUESTIONS OF A SENSITIVE NATURE

With the exception of questions on disability status, t
Agencies may include in the "Participants" section of reports, demographic information on the participants. T**he demographic information requested is based on government-wide standard categories currently in use on a variety of forms, and would only pertain to the people who have directly worked on the award.** Including this section in its reports is optional with each agency. OMB has provided authorization to utilize the disability questions contained in the RPPR until revised standard questions can be developed.

Submission of such data is voluntary. The demographic data will be used by agencies **NSF for data analysis and reporting; it will not be used** by agencies **as part of the progress report evaluation.   The data will be collected, maintained, and used in accordance with the Privacy Act of 1974, and any other applicable OMB and agency policies and practices.**

See below for the section on what is included for the request for personal information:

Please provide demographic data (i.e., gender, ethnicity, race, and disability status) for persons who have contributed significantly to the project. Submission of such data is voluntary. Such data need not be provided, if submitted under a previous performance report. There are no adverse consequences if the data are not provided. Confidentiality of demographic data will be in accordance with the agency's policy and practices for complying with the requirements of the Privacy Act.

Gender: Male Female Do not wish to provide
Ethnicity: Hispanic or Latino, Not-Hispanic or not-Latino, Do not wish to provide
Race (select one or more): American Indian or Alaska Native, Asian, Black or African American Native Hawaiian or other Pacific Islander, White, Do not wish to provide
Disability Status: Hearing Impairment, (select one or more) Visual Impairment, Mobility/Orthopedic Impairment, Other (Specify), None, Do not wish to provide

Since I am not entirely clear what needs to go in this section, I do note that we do justify our inclusion of the information in the format itself with the following language:

The following language is included to justify NSF's inclusion of the information in the format:

Agencies use demographic data for statistical purposes, primarily to help:
- **Gauge whether our programs and other opportunities are fairly reaching and benefiting everyone regardless of demographic category;**

- Ensure that those in under-represented groups have the same knowledge of and access to programs, meetings, vacancies, and other research and educational opportunities as everyone else;
- Gauge and report performance in promoting partnerships and collaborations;
- Assess involvement of international investigators or students in work we support;
- Track the evolution of changing science, technology, engineering and mathematics
- (STEM) fields at different points in the pipeline (e.g., medicine and law demographics have recently changed dramatically);
- Raise investigator and agency staff awareness of the involvement of under-represented groups in research;
- Encourage the development of creative approaches for tapping into the full spectrum of talent of the STEM workforce;
  - ~~• Encourage the development of creative approaches for tapping into the full spectrum of~~
  - ~~talent of the STEM workforce;~~
- Respond to external requests for data of this nature from a variety of sources, including
- NAS, Congress, etc.; and
- Respond to legislatively-required analysis of workforce dynamics. Legislation requires at least one agency to routinely estimate scientific workforce needs. This analysis is accomplished through reviewing demographic data submitted for the existing workforce.

15. ESTIMATE OF BURDEN

With the exception of the Budgetary Information component, it is NSF's intention to use all other components of the RPPR. This is consistent with the information currently collected in NSF's standard project reporting format. **It should be noted that burden estimates associated with forms currently in use range from a minimum of 2 hours to a maximum of 16 hours, depending on the type of research project being supported.**

 with this collection will remain the same, given that the RPPR format is largely based on the format in use for many years by NSF.

NSF collects approximately 28,030 annual progress reports, with an estimated number of five hours per report, for a total of 140,150 hours.

The following table provides the estimated numbers of annual progress reports, hours per report, and total annual hours by agency:

Department/Agency Name	Number of Annual Progress Reports	Estimated Number of Annual Hours	Total Annual Hours
Energy	16000	5	80000
USDA/NIFA	12658	2.7	34177
EPA	150	4	600
NEH	550	2	1100
NASA	4000	4	16000
Education/IES	500	16	8000
NIST	100	4	400
NOAA	1105	2	2210
HHS (including NIH)	37900	14.862	563275
Defense	11000	6	66000
Homeland Security	411	12	4932
NSF	28030	5	140150
Totals	112404	6.6 (average)	916844

ANNUALIZED COST TO RESPONDENTS

Not sure I understand how you came up with this. Can we chat further??

The annualized costs to NSF's respondents is estimated at $3,894,769. This is based on data from the Bureau of Labor Statistics website: http://www.bls.gov/oes/2008/may/naics4_611300.htm for the median hourly rate of 27.79 for Education, Training, and Library Occupations,

(140150 hours multiplied by 27.79/hour equals 3,894,769.)

Department/Agency Name	Type of Respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
Energy	Principal Investigator	80000	27.79*	2,223,200
USDA/NIFA	Principal Investigator	34177	27.79	949,779
EPA	Principal Investigator	600	27.79	16,674
NEH	Principal Investigator	1100	27.79	30,569
NASA	Principal Investigator	16000	27.79	444,640
Education/IES	Principal Investigator	8000	27.79	222,320
NIST	Principal Investigator	400	27.79	11,116
NOAA	Principal Investigator	2210	27.79	61,416
HHS (including NIH)	Principal Investigator	563275	27.79	15,653,412
Defense	Principal Investigator	66000	27.79	1,834,140
Homeland Security	Principal Investigator	4932	27.79	137,060
NSF	Principal Investigator	140150	27.79	3,894,769
Totals		916844	27.79	25,479,094

*This data is from the BLS website: http://www.bls.gov/oes/2008/may/naics4_611300.htm

16. CAPITAL/STARTUP COSTS

There are no capital or startup costs to respondents.

17. ANNUALIZED COST TO THE FEDERAL GOVERNMENT

~~Each agency~~NSF currently has existing personnel, systems and processes (or other resources) in place to receive and review the annual project report submissions~~ir progress reports~~, as required by current, established practices mandated by OMB Circulars.

Grants administrative personnel who review progress and final grant reports generally are in the GS-14 and 15 range. Based on a step one average of these grades (OPM General Schedule Pay Table for 2010), an average hourly salary is $44.16 per hour. It is further estimated that about an hour of time is needed to review a progress report, leading to $3,686,211.80 estimated annual cost to the Federal Government.

18. CHANGES IN BURDEN

~~This is a new collection.~~

19. PUBLICATION OF COLLECTION

Not applicable.

20. SEEKING APPROVAL TO NOT DISPLAY OMB EXPIRATION DATE

Not applicable because the OMB number and expiration date will be included on the data collection.

21. EXCEPTION(S) TO THE CERTIFICATION STATEMENT (19) ON OMB 83-I

Not applicable.

B.
~~**C.**~~ **STATISTICAL METHODS**

No statistical methods are employed in this information collection.