CareerTrac
Tracking Trainees to Success

September 17, 2012

Linda McLoon, PhD
Chair, Advocacy Committee
ARVO and University of Minnesota, Department of Ophthalmology

Sent via email: kcolson@arvo.org

RE: Response to Comment Request; CareerTrac

Dear Dr. McLoon,

On behalf of the Institutes involved in CareerTrac, I submit the following response to your comments regarding the CareerTrac Federal Register Notice on June 1, 2012.

1. The respondent indicates that collecting information on trainees' for10 years will present an undue burden on their members. However, collecting information on trainees for 10 years is a clear condition of an institutional training grant award as indicated in the Funding Opportunity Announcement and the Notice of Grant Award. The grantees/PIs agree to this condition when they receive the award. This system simply provides them with a database to use to meet this condition as they prepare annual progress reports.

2. The respondent questions the burden estimate used. In fact, we calculated the wrong burden estimate. In the 60 day Federal Register Notice, we indicated that the average PI will have 30 trainees to track in any given year and will spend 30 minutes entering data for that trainee. That equals 900 minutes or 15 hours. We inadvertently listed 7.5 hours listed in the average time per response based on the previous OMB clearance that only estimated 15 trainees per year per grantee. As we add new Institutes to the system, these institutes' PIs tend to have more trainees per year, so in this round of OMB clearance, we have increased the estimate of the number of trainees the PIs will be tracking per year.

3. The respondent also questioned what would happen when a trainee moves into a new program and wonders if both the new PI and the original PI would include the necessary information in his/her reports resulting in redundant information. The answer is yes, but NIH does not view it as redundant, because trainees produce different publications at the different institution (this is the most common accomplishment.) The current, paper based system works this way. CareerTrac, however, would actually help resolve this concern

because it has the potential (not yet implemented, but we are working towards it) to link trainee experiences across different training appointments.

4. The respondent wants to know what happens if a trainee leaves the field or obtains a grant of his/her own during the reporting period. If the trainees leaves the field, that would be reported as a change in their employment. If the trainee obtains a grant of their own, that would be reported as an accomplishment and the PI can indicate if it occurred during the trainee's tenure as a trainee or after. One of the main benefits of the CareerTrac system is to provide PIs with an opportunity to report on their trainees' accomplishments and successes which help us understand the longer term outcomes of training programs.

5. The respondent suggested that we put the burden of tracking/reporting on the trainee and provide each trainee with access to eRA Commons. We agree that direct access for trainees would be helpful, and we intend to explore options for using the commons ID as an approach to give trainees access. While we agree that direct trainee access would be helpful, the challenge of authenticating individual trainees currently prohibits us from doing so, without violating federal IT security guidelines.

We have had many grantees who have utilized the CareerTrac system over several years and are very supportive of the system and excited about the opportunity to use it.

Kind regards,

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