

Dear Ms. Mar:

In response to NSF's Notice in the Federal Register (Vol. 77, No. 179, Sep 14, 2012), we received three comments, including one from the Council on Governmental Relations (COGR). Our application package to OMB included our response to COGR (Statement A, p. 5—Commenter 2, which we also provided directly to COGR), which was published in the Federal Register (Vol. 78, No. 105, May 31, 2013). COGR then submitted a second comment in response to this Notice, which was addressed to you. This second comment is largely duplicative of the first one.

COGR's "principal and over-riding objection" to our data collection is that it is "not necessary to affirm compliance with the policy requirement", and thus is excessively burdensome on the community. COGR suggests we need only the grantee's plan and verification of student attendance to assess compliance. If we followed COGR's suggestion to limit our effort and determine only whether grantees were complying with NSF's requirement to have a program, there would be little value added. COGR has apparently missed the purpose of our project as stated in the Notice in the Federal Register. Assessing institutional compliance is only part of what we hope to accomplish. As we stated:

This information collection is necessary for review of institutional compliance with the responsible conduct of research requirements. NSF OIG will primarily use the data collected to inform the Foundation and Congress whether current responsible conduct of research programs comply with NSF's requirement and to make recommendations to strengthen these programs if necessary. The results of the information collection also will assist NSF OIG in developing a responsible conduct of research oversight plan.

Thus, we stated we are interested not only in whether grantees minimally comply with the requirement, but how they comply. As noted, this additional information will be used to make recommendations to NSF about strengthening the RCR program, if necessary. As one example, both NSF and NIH have RCR programs with which grantees must comply. NIH's program is much more prescriptive than NSF's. We would like to know how grantees meet the disparate requirements of both agencies and whether a more unified approach would better serve NSF and the grantees. In our response, we confirmed we are requesting the documents COGR suggests: the grantee's RCR plan and verification of student and post-doctoral training. The additional documentation we propose collecting is a description of course materials and information regarding resources available to the program.

Our sample engagement letter was provided in our package (Appendix A1-engagement).

COGR complains that Investigators may have to take time to respond to us rather than work on their research. We are not requesting to speak with any Investigators, although Commenter 3 suggested our list of interviewees was incomplete because we did not include faculty. As we noted in both our Federal Register Notices, we are requesting to talk to one representative of a grantee's leadership, the RCR course administrator, and students and post-docs who have received the RCR training. One could argue that post-docs and students should remain in the lab conducting research, but since the RCR training is supposed to benefit students, we believe it is paramount to include students and post-docs who want to talk to us about their RCR training experience. Contrary to COGR's view, another commenter (Commenter 1 to the second Federal Register Notice) suggested we talk with more students, not exclude them. We have made a judicious effort to minimize the burden on the grantees, as described in Statement A, part A.12 (we are only asking for 1 hour of students' time from fewer than 100 of NSF's approximately 3100 grantees). Commenter 1 also observed the most effective way to reduce the burden on respondents would be to give clear and timely guidance about what constitutes adequate RCR training. As we noted in our response:

NSF has not specified what constitutes 'adequate' RCR training. We are assessing how grantees have implemented NSF's requirement, how many of them would welcome further specificity in NSF's requirement, and how many would not—and why or why not. As we note, one likely outcome of our effort would be recommendations back to NSF for improving its RCR program, and, depending on the response data, this could be one of those recommendations.

This is our responsibility under the Inspector General Act “to promote economy, efficiency, and effectiveness in the administration of” NSF programs.