

Supporting Statement A for

Early Career Reviewer Program Application and Vetting System (EAVS)
National Institutes of Health
Center for Scientific Review (CSR)

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Executive Summary

The Center for Scientific Review (CSR) is the portal for NIH research grant applications and their review for scientific merit. Our mission is to see that NIH grant applications receive fair, independent, expert, and timely reviews – free from inappropriate influences – so NIH can fund the most promising research. To accomplish this goal, Scientific Review Officers (SRO) form study sections consisting of scientists who have the technical and scientific expertise to evaluate the merit of grant applications. The CSR Early Career Reviewer (ECR) program was developed to identify and train qualified scientists who are early in their scientific careers and who have not had prior CSR review experience. Currently, the application process involves repeated email interactions with potential applicants and manual management of information. To make the application process more efficient for applicants and for CSR staff, we worked with the Information Management Branch (IMB) at CSR to develop online application software which includes the collection of applicants' names, contact information, and professional CV. This PRA clearance request is to deploy this new online application software for ECR program applicants (ECR Application and Vetting System - EAVS). Prior to this request, OMB approval for information collected for the ECR program had not been sought because the collection of professional information on potential reviewers is part of normal business practices for CSR. Given our plans to create an automated system for reviewer information collection, we are now seeking OMB approval.

A.1 Circumstances Making the Collection of Information Necessary

NIH Center for Scientific Review: Overview

The Center for Scientific Review (CSR) is the portal for NIH grant applications and their review for scientific merit. We receive all research grant applications sent to NIH and handle the review of more than 70% of those by organizing peer review groups (study sections) to evaluate research grant applications. Our mission is to see that NIH grant applications receive fair, independent, expert, and timely reviews – free from inappropriate influences – so NIH can fund the most promising research.

To accomplish this goal, Scientific Review Officers (SRO) form study sections consisting of scientists who have the technical and scientific expertise to evaluate the merit of grant applications. Potential study section members are identified by SROs by canvassing the scientific literature, outreach at national scientific meetings, review of successfully funded applications, and by referral from other scientists. **The legislative authority to collect information from potential reviewers to determine their appropriateness to serve on grant application review panels is 42 USC Section 241: Research and Investigations General.**

Early Career Reviewer Program

The NIH Center for Scientific Review (CSR) Early Career Reviewer (ECR) program was developed to (1) identify and train qualified scientists who are early in their scientific careers and who have not had prior CSR review experience to become effective reviewers, (2) help emerging researchers advance their careers by exposing them to peer review, and (3) enrich the existing pool of NIH reviewers by including scientists from less research-intensive institutions as well as those from traditionally research-intensive

institutions. This PRA clearance request is to deploy our new online application software for ECR program applicants.

ECR Application Process

To apply for inclusion in the ECR Program, applicants forward their Curriculum Vitae (CV) or professional resumes and provide some identifying information, areas of expertise, and selection of preferred study sections via an online application. They are vetted for inclusion in the ECR program based on the information provided in their CVs. CVs are commonly used documents for recording work history and accomplishments. Creation and updating of a CV is a common exercise of researchers and other professionals. A customary practice of SROs in the course of their duties at CSR is to review the CVs of potential reviewers. CVs provide substantial information regarding current employment, publication history, grants received, and other professional achievements, all of which are very useful in evaluating applicants' eligibility to serve on study sections as reviewers.

To facilitate vetting of ECR applicants, CVs and information regarding their areas of scientific and technical expertise are forwarded through an interface from the online application to SROs of the study sections selected by applicants. SROs evaluate applicants' eligibility and respond electronically to the ECR program staff regarding the vetting outcome. Letters are sent via email to applicants informing them of their acceptance in the ECR program or providing them with feedback as to why they did not qualify (see Attachment 4: Sample Letters to Applicants). The latter group is encouraged to strengthen their CV and reapply at a later date.

In summary, ECR applicants' contact information, CV, and areas of expertise must be collected to appropriately evaluate them for inclusion in the ECR program. An online application system is more cost-effective and efficient than transmitting information between applicants and ECR staff by mail. The software program (EAVS) has been developed. OMB clearance is being sought to deploy the software.

A.2 Purpose and Use of the Information Collection

The ECR program is not a research project

This is a new information collection request. This is not a research project. There are no plans to publish any of the information collected from applicants. Periodic summaries of the information collected (e.g., number of applicants by institution, state or region) will be for internal use only. In those cases, information will be reported in aggregate form without individual identifiers. The primary purpose of this PRA clearance request is to gather this information from ECR program applicants via an online application in a systematic way that reduces burden on the applicants and governmental costs associated with processing.

Proposed ECR Application and Vetting System (EAVS) Software

ECR applicant information is provided for the purpose of evaluating qualifications to serve on study sections at CSR. This PRA clearance request is to gather information via

an online application for the purpose of evaluating ECR applicants' eligibility to serve on review committees at CSR. This information will include the ECR applicants' names and institutions, areas of expertise, training credentials, professional accomplishments, email addresses, and NIH Commons names, most of which will be provided in their CVs (see Attachment 1: Screen Shots of Online Application Format). Applicants will be asked to select up to four study sections that match their areas of expertise to better direct applicants to SROs responsible for study sections that match the applicants' areas of expertise. The provision of a Commons ID allows staff members to more easily add selected ECRs to study section rosters via NIH data systems (IMPACII).

EAVS has been developed to gather this information from applicants via an online application. This will reduce burden on the applicant and be more efficient and cost-effective for CSR. An online system will reduce staff time to process applications and increase the speed of transmission of applications for the ECR program to SROs who are in the best position to evaluate applicants' appropriateness to serve as reviewers. It will also allow for seamless provision of feedback to applicants regarding their eligibility and places those accepted into a pool of applicants who might be invited to participate in future study sections.

The ECR website will provide a link to the online application. Two options will be provided; one will allow institution administrators to refer applicants and one will allow applicants to self-nominate by completing the application and uploading their CVs. Attachment 1 includes screenshots of EAVS. The application software has been developed by the CSR's Information Management Branch (IMB) in collaboration with CSR ECR staff for the sole use by CSR SROs in forming scientific review panels to review applications for research support.

A.3 Use of Information Technology and Burden Reduction

Privacy Impact Assessment

In September 2011, a Privacy Impact Assessment was initially completed for the NIH CSR Early Career Reviewers Database and has been renewed annually. (See Attachment 2: ECR Program Privacy Impact Assessment for the most recent PIA.) The PIA included the development of a database of applicants for the ECR program. As indicated above, the database includes applicants' names, email address, academic institution and position, areas of expertise, and NIH Commons ID. The online application software will direct information into the NIH CSR Early Career Reviewers Database. Once EAVS has been approved by OMB, the PIA will be updated to reflect these changes for the NIH CSR Early Career Reviewers Database.

It was determined by the CSR Privacy Officer that a Confidentiality Agreement would not be necessary for this proposed project. The existing protections afforded to all reviewers who serve on committees will apply to applicants for the ECR program.

Current System - Application via Email - Burden for Applicants

Currently, those interested in joining the ECR program are directed to the ECR website (See Attachment 3: ECR Website - www.csr.nih.gov/ECR) that provides information and an email address where interested applicants can email their CVs and descriptions of their areas of expertise. The process of reviewing the website and emailing a CV and expertise terms takes approximately 20 minutes per applicant. A follow-up email is sent requesting that the applicant select up to four study sections that match his or her areas of expertise and provide their NIH Commons name. The applicant is directed to a website that facilitates selection of study sections. Response to this email takes approximately 10 additional minutes per applicant.

Current total applicant burden is approximately 30 minutes for each ECR program applicant.

ECR Application and Vetting System (EAVS) - Burden for Applicants

EAVS will allow applicants to access an application form through our ECR website and provide all the information needed for vetting the applicant for inclusion in the ECR program. Attachment 1 (Screen Shots of EAVS) provides screenshots of EAVS. Completion of the online application should take no longer than 25 minutes per applicant.

For the proposed online application system, the total estimated applicant time burden for applicants (users) is approximately 25 minutes.

A.4 Efforts to Identify Duplication and Use of Similar Information

The information that will be gathered through EAVS software is not available from any other source or agency.

A.5 Impact on Small Businesses or Other Small Entities

Researchers from small organizations will be eligible to apply for the ECR program using the proposed online system. The time estimated for completion of the online application will be the same for all applicants, including those from small businesses (see section A.3). **The information being requested of all applicants has been held to the minimum required for evaluation of applicants for the ECR program.**

A.6 Consequences of Collecting the Information Less Frequently

Frequency of Application

Applicants for the ECR program will complete the application and upload their CVs only once after selecting the “Apply for the ECR Program” option in EAVS. Applicants who do not meet the minimum requirements for inclusion in the ECR program will be provided with specific feedback on why they were not accepted. All of those not accepted will have the option to reapply after they have had time to strengthen their qualifications. Reapplication can occur at any time and consists of repeating the original application steps. Applicants can apply more than twice if needed. It is possible that

those accepted into the ECR program will change jobs and/or contact information during their time of participation in the ECR program. These individuals can update their information using the same online application by selecting the “update your information” option (see attachment 1).

Consequence of not collecting applicant information

As described in Section A.4, some of the eligibility information gleaned from applicants’ CVs might also be available through university websites, IMPACII, social media sites, professional association websites or via telephone or email contact with the applicant. These sources are used inconsistently by applicants. They may include outdated or incomplete information, all of which introduce the potential for inconsistency in the manner in which applicants are evaluated. Completing the online application and uploading a CV standardizes the process.

The online application and CV also greatly reduces staff time that would be needed to conduct detailed online searches for information on each applicant. Given the high volume of applicants, it is more cost-effective to ask applicants to provide their CVs and information regarding their degree, training, expertise, and study section preferences, than to hire staff to conduct individualized online searches to verify the qualifications of each applicant. It also prevents the problem of misidentifying information online as pertaining to applicants when it may belong to another person with a similar name. Finally, providing all information at the time of application reduces the number of times that CSR staff contact the applicant to verify or to request additional information.

A.7 Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

The proposed ECR Application and Vetting System (EAVS) will fully comply with all guidelines stated in 5 CFR 1320.5.

A.8 Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency

Published 60-day Federal Register notice:

March 13, 2013, Volume 78, Number 49, Pages 15959-15960. There were no public comments regarding the proposed work in response to this Federal Register Notice.

Consultation with advisors regarding the program

The plan to develop EAVS was discussed with and approved by the Director of CSR, Richard Nakamura; Director of the Division of Aids, Behavioral and Population Sciences, Karyl Swartz, who directs the ECR program; the staff of the Information Management Branch of CSR who developed the online application software; and the Information Technology Steering Committee at CSR which includes SROs, IRG Chiefs, Division Directors, and CSR support staff members. Their recommendations were incorporated into the development plans for the online application software.

Feedback from persons outside the agency

This application is not for a research project. Comments were solicited from persons outside of NIH regarding the planned online application system. These individuals have served on study section panels as part of the ECR program. Their names and contact information is as follows:

Tuhina Neogi, MD, PhD
Associate Professor
Boston University School of Medicine
617-638-5180
tneogi@bu.edu

Arti Shukla, PhD,
Associate Professor
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Aleksandar Videnovic, MD, MSc
Assistant Professor of Neurology
Circadian Rhythms and Sleep Research Laboratory
PD and Movement Disorders Center
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Northwestern University
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Chicago, IL 60611
312-503-1819
avidenov@nmff.org

Internal Testing of EAVS

Internal pilot testing of EAVS by IMB staff began on May 2, 2013. This allowed for identification and resolution of programming errors. On July 24, 2013, IMB staff provided ECR staff with test cases as part of their internal User Acceptance Testing (UAT). This included provision of scenarios that ECR applicants would be likely to encounter. This allowed ECR staff to pre-test the responsiveness of the program to common scenarios encountered when completing the ECR application such as not having an NIH Commons ID. In addition, the ECR program coordinator and analyst carefully examined each screen seen by ECR program applicants and provided feedback to IMB staff regarding cosmetic changes and programming problems.

Internal testing of the vetting component of EAVS has been completed. Scientific Review Officers at CSR volunteered to assist by using EAVS to vet fake application for the ECR program. They provided feedback on system errors experienced during the pilot

testing process. Some errors included programming problems, which have been addressed. Other problems included typographical errors on some EAVS webpages and awkward placement of “select” buttons. In all cases, the feedback provided by SROs was incorporated into refinements of EAVS.

Pilot Testing of EAVS

Seven individuals who had recently submitted applications for the ECR program via email were invited to pilot test EAVS by resubmitting their application using EAVS. Five of these individuals agreed to participate in the pilot testing. All were able to successfully use the program. Their applications were vetted immediately as expected and they received an automated letter indicating the results of their application. All provided feedback on their experience. A problem with a missing item on the study section drop down list was noted by one applicant and has been repaired. All other comments were positive regarding ease of use, opportunity to provide relevant information, and speed of the processing of their application. These individuals are as follows:

Sriram Ramaswamy, MD	Creighton University School of Medicine	(402) 280- 5517	sramaswamy@creighton.edu
Xiangrong Kong, Ph.D.	Johns Hopkins University	(410) 614-4827	xikong@jhsph.edu
Michelle Fennessy, Ph.D.	Ohio State University	(614) 292-8045	Fennessy.6@osu.edu
Ashley Acheson, Ph.D.	University of Texas Health Science Center at San Antonio	(210) 567-2741	Acheson@uthscsa.edu
Michele Balas, Ph.D.	Ohio State University	(614) 949-5555	Balas.17@osu.edu

NIH Agency consultation

The development of plans for creating EAVS was part of a collaborative effort between the ECR program staff, CSR Information Management Branch (IMB) personnel, and the Director of CSR. A draft plan to collect information online from applicants and the flow of information from applicant to ECR database was developed by ECR Staff and approved by Karyl Swartz, Director of the ECR program. Monica Basco, ECR Coordinator, worked with Brian Pomykala, IT Portfolio Manager from IMB, to develop a Business Case Request that detailed the information to be collected using the online application, the flow of data into a secure database, how the information is sent to SROs for vetting of applicants, and how vetting results are recorded and communicated back to the applicant. The plan was reviewed by Rashid Shah, Business Analyst and Harish Vajja, Software Engineer, who collaboratively built and managed the ECR database (previously PIA approved, see Attachment 2). After their feedback was incorporated into the plan, the Business Case Request was reviewed by Dipak Bhattacharyya, Branch Chief

of IMB. Swartz, Basco, and Pomykala presented the plan to Drs. Bhattacharyya and Nakamura for their approval. The business plan and budget for production were approved. The ECR online application plan was then presented to CSR’s Information Technology Steering Committee (ITSC). Suggestions made by the ITSE were incorporated into the overall plan for developing the online application. The ITSC consists of the following CSR Staff members:

Bhattacharyya	Dipak	Co-Chairperson	301-435-0683	Email address bhattadi@csr.nih.gov
Garte,	Seymour	Co-Chairperson	301-435-1260	gartes@csr.nih.gov
Drgon,	Tomas	Member	301-435-1017	tdrgon@csr.nih.gov
Freund,	Robert	Member	301-435-1050	freundr@csr.nih.gov
Li,	Xiang-Ning	Member	301-435-1744	lixiang@csr.nih.gov
Peterson,	Joseph	Member	301-408-9694	petersonjt@csr.nih.gov
Pyper,	Joanna	Member	301-435-1151	pyperj@csr.nih.gov
Richon,	Allen	Member	301-435-1024	allen.richon@nih.gov
Roman,	Laura	Member	301-435-0715	romanl@csr.nih.gov
Rudolph,	Joseph	Member	301-408-9098	josephru@csr.nih.gov
Tosten,	Timothy	Member	301-435-1111	tostent@csr.nih.gov
Shah,	Rashid	Secretary	301-435-1056	shahr@csr.nih.gov
Floissac,	Michael	Advisor	301-408-8515	floissacma@csr.nih.gov
Nair,	Prema	Advisor	301-435-0674	nairpg@csr.nih.gov
Pomykala,	Brian	Advisor	301-443-9080	pomykalab@csr.nih.gov
Sur,	Douglas	Advisor	301-435-0967	dsur@csr.nih.gov

A.9 Explanation of Any Payment of Gift to Respondents

The opportunity to participate in the ECR program is voluntary. No compensation is provided for applying to the program. Those selected to be part of the ECR program will have the opportunity to serve on review panels. All reviewers on study sections are paid an honorarium for their reviews. No additional compensation is paid to ECRs.

A.10 Assurance of Confidentiality Provided to Respondents

System of Record

The IT system in which information is stored is entitled the NIH CSR Early Career Reviewers Database. The system was assessed with a Privacy Impact Assessment. The date of the completion of the PIA was 03/13/13. The Privacy Act applies to this activity. The number of the Privacy Act Systems of Record Notice that covers the information

collection is 09-25-0036. The date of publication in the Federal Register was September 26, 2002. This application for Paperwork Reduction Act Clearance has been completed in consultation with the CSR Privacy Officer, Michael Floissac.

Confidentiality

Confidentiality is protected in the information system known as NIH Early Career Reviewers Database through compliance with laws, regulations and other mandates (e.g. Privacy Act, OMB Guidance). Additionally, CSR has in place operational safeguards such as training, education and awareness for PII protection. CSR has also implemented multiple technical security controls to limit access to data, monitor events that affect confidentiality and has an incident response plan to handle breaches to this data. Annual Privacy Impact Assessments (PIA) are held to review and mitigate privacy risks.

It was determined by the CSR Privacy Officer that a Confidentiality Agreement would not be necessary for this proposed project. The existing protections afforded to all reviewers who serve on committees will apply to applicants for the ECR program.

To maximize the protection of their personal information, applicants will be asked to register prior to completing the ECR program application that will include creation of a username and password. Applicants' CVs and additional identifying data will be saved on a secure website that is accessible only through special permission granted to CSR staff. Access to this information is given only to those who evaluate applicants for their appropriateness for the ECR program. The database of those accepted into the ECR program can be searched via an interface only accessible to CSR staff through the CSR intranet. The Information Management Branch (IMB) staff grants SROs access to the searchable database and deletes permissions for access if SROs leave their employment at CSR. SROs must login to the database with their NIH user id and password.

When EAVS has been approved for use by OMB, the website will include a statement regarding privacy as part of the introduction to completing the application. It will indicate that the information provided will be kept private to the extent allowed by law and not disclosed to anyone but the staff of CSR who process the application except as otherwise required by law. We will also include in the introduction to the application a statement that clearly states that **42 USC Section 241: Research and Investigations General** provides legislative authority to collect information for the ECR program, that application for and participation in the ECR program are strictly voluntary, and that no consequence exists for choosing not to participate (see Attachment 6: Sample statement for website regarding confidentiality and voluntariness).

ECR Database

The information to be retained in the searchable ECR database includes applicants' names, job title, email address and institutions. We are not collecting date of birth, social security number, home address, race, ethnicity, or gender. We have chosen not to collect race and ethnicity data on ECR applicants for two reasons: (1) the information provided by ECR applicants will be made available to SROs for the purpose of evaluating

applicants' qualifications for inclusion in the program. We want to avoid potential bias as well as the appearance of bias based on race/ethnicity in our evaluation process. (2) When applicants create NIH Commons accounts, they have the option to choose whether or not to disclose information regarding race and ethnicity. Access to those data is limited to protect the applicant. However, when data summaries by race/ethnicity are needed for program evaluation purposes, only approved personnel with specific responsibility for data summaries can access those data. ECR program staff will not have access to sensitive data from individual applicants.

The information to be collected via the online application and used for vetting applicants for the ECR program is the same information used by SROs to vet all other potential study section members. In the course of daily job duties, SROs gather information on potential reviewers including education and job title, professional accomplishments, publications, and any other information that represents the expertise of the potential reviewer.

EAVS will allow for collection of identical types of information from each ECR applicant. Summaries are periodically tallied in an aggregate form for administrative use regarding the institutions at which ECR applicants and those selected to serve as ECRs are employed. Names of ECRs are not included in these summaries. The information from applicants is not used for research or survey purposes.

A.11 Justification for Sensitive Questions

Information to be collected and its purpose

ECR applicants' names, degree, email addresses, job titles, and employers will be collected as part of the online application. As indicated in section A.10, sensitive information will not be collected. Names allow for unique identification of applicants. In the PIA approved ECR database, an arbitrary unique identifier is generated for each applicant so that data can be summarized without using applicants' names. Email addresses are collected as the primary means of communication between the applicants and the ECR program. Telephone numbers and addresses of applicants are not specifically requested. However, it is not uncommon for applicants to include contact information in their CVs. All CVs are stored in a password protected shared file that is only accessible to SROs at CSR.

To be eligible for inclusion in the ECR program, applicants must have attained a doctorate degree and have secured full time employment in a faculty position or its equivalent at a research institution. Collection of information on educational attainment, job title, and employer are required for evaluating applicants' eligibility for the ECR program. The CV contains information regarding publication history, research activities, and other accomplishments, all of which are needed to determine the eligibility of the applicant to serve as an ECR.

Sensitive information is not needed to evaluate each applicant’s eligibility for the ECR program and will therefore, not be collected as part of the online ECR program application.

Privacy

In addition to the protections described in section A.10, applicants will maintain control of the location from which they complete the online application. This allows applicants to maintain control over the privacy of their data during the application process.

Disclosures to Applicants

The ECR website (see Attachment 3) currently includes information regarding the nature of the ECR program, benefits of participation in the ECR program, eligibility requirements, and what can be expected to occur following application. Details will be added to the website regarding the online application process, a clear statement that participation is voluntary, and confidentiality assurances as described in A.10. Applicants who do not wish to or are unable to complete an online application will be able to contact the ECR office by email to apply for the program.

A.12 Estimates of Hour Burden Including Annualized Hourly Costs

Annual Hour Burden

Based on recent emails from researchers indicating an interest in joining the ECR program, it appears that the flow of applicants is approximately 30 per week. Assuming a constant rate, the ECR program should receive approximately **1,560 applications per year**. Using an estimated response time of **25 minutes per application**, the **annual burden for applicants is 650 hours**. Section A.3 provides additional details regarding this estimate.

A.12 - 1 ESTIMATES OF ANNUALIZED BURDEN HOURS				
Type of Respondents	Number of Respondents	Frequency of Response	Average Time per Response	Annual Hour Burden
Applicants	1,560	1	25/60	650
Totals	1,560			650

Annualized Cost to Respondents

A survey of 1251 colleges published in April 2012 in the Chronicle of Higher Education (<http://chronicle.com/article/faculty-salaries-barely-budge-2012/131432>) showed that assistant professors across disciplines are earning an average of \$66,564 per year based on a 9 month work year. This can be extrapolated to \$88,752 per year based on a 12 month work year and \$42.67 per hour based on a 40 hour work week. The vast majority of applicants to the ECR program are Assistant Professors. Therefore, this number was used to calculate the annualized costs to respondents.

Based on an estimate of 1,560 applications per year, each taking 25 minutes to complete, the anticipated average annual respondent cost of the ECR online application is \$27,736. According to the report described above, the range in annualized salaries for assistant professors is quite large (\$150,000/12 months to \$66,666/ 12 months). Therefore, the potential range in annualized cost to respondents is \$20,000 at the lower end to \$45,002 on the higher end.

A.12 - 2 ESTIMATED ANNUALIZED COST TO RESPONDENTS					
Type of Respondents	Number of Respondents	Frequency of Response	Average Time per Respondents (in hours)	Hourly Wage Rate*	Respondent Cost
Applicants	1,560	1	25/60	\$42.67	\$27,736
Totals	1,560				\$27,736

* Source of estimate: <http://chronicle.com/article/faculty-salaries-barely-budge-2012/131432>

A.13 Estimate of Other Total Annual Cost Burden to Respondents or Record

There are no additional cost burdens to respondents other than those described in section A. 12.

A.14 Annualized Cost to the Federal Government

Online Application Development Costs

The Information Management Branch of CSR has estimated that the development of the online application software for the ECR program has taken 556 hours to complete at a rate of \$120 per hour. The cost for development is estimated at \$22,240 per year for three years for a total of \$66,720. Attachment 5 (Estimated Level of Effort to Build the ECR Online Application) provides a summary of the estimated level of effort required at each stage of development to build the ECR online application.

As with any computer software, personnel time will be needed annually to update and maintain the online application software. The estimated time needed will be 208 hours per year at \$24,960.

ECR Program Management Costs

As described in Section A.3 on Burden Reduction, NIH/CSR staff members are involved in the processing of applications for the ECR program. The proposed application software will greatly reduce the staffing resources needed to process applications, provide feedback to applicants, and manage application data. It is estimated that ECR personnel costs related to the processing of applications once the software has been deployed will include 2% Program Director time, 10% Program Coordinator time, and 35% administrative assistant time. The estimated annual cost to the federal government for administration of the online application software is \$65,977.

Annual Software Development and Maintenance Costs:	\$47,200/ year
Annual Program Management Costs:	\$65,977/year
Total annualized Costs to the Federal Government	\$113,177/year

A.15 Explanation for Program Changes or Adjustments

This is a new collection of information.

A.16 Plans for Tabulation and Publication and Project Time Schedule

The estimated number of hours to complete the online application software is presented in Attachment 5 (Estimated Level of Effort to Build the ECR Online Application). The following are estimated dates for completion of the overall software development project.

1. Non-functional portal site available for review (no workflow, just the data entry / front end site only) by the Opera / HHS staff – 05/2/13
2. Fully functional ECR site ready for internal testing – 07/22/13
3. Fully functional ECR site ready for pilot testing – 09/25/13
4. Fully functional ECR site ready for production after OMB Approval – 11/26/13

A.17 Reason(s) Display of OMB Expiration Date is Inappropriate

We are not requesting approval to not display the expiration date for OMB approval. Therefore, section A.17 is not applicable.

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions

We are not requesting an exception to certification for the Paperwork Reduction Act. Therefore, Section A.18 is not applicable.