

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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Extension

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Name: Mary Ann Guadagno, Ph.D.

Address: 6701 Rockledge Drive, Room 3182, Bethesda, MD,
20892-7776

Telephone: 301-435-1251

Fax: 301-594-6363

Email: guadagma@csr.nih.gov

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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, online application software, the ECR Application and Vetting System – EAVS (see Attachment 1), is accessed by ECR program applicants who provide their names, contact information, a description of their areas of expertise, and professional CV. The information is transmitted to SROs who vet applications. This information collection request (ICR) is to continue to use EAVS software to process applications for the ECR program.

A.1 Circumstances Making the Collection of Information Necessary

NIH Center for Scientific Review: Overview

This is a request for an extension of an Office of Management and Budget (OMB) approval, under the Paperwork Reduction Act of 1995, for OMB No. 0925-0695, Expiration Date: 04/30/2017. This clearance approves an information collection request (ICR) to continue to use EAVS software to process applications for the ECR program.

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 75% 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 continue to utilize our online application software for ECR program applicants.

ECR Application Process

To apply for inclusion in the ECR Program, applicants provide 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 2: Sample Letters to Applicants). The latter group is encouraged to strengthen their CV and reapply at a later date.

Since the initiation of the OMB approved Early Career Reviewer Application and Vetting System (EAVS), we have received more than 3,000 registrations to use the system and more than 2,600 applications. We currently average approximately 90 applications per month. The vetting component of the system refers applications to Scientific Review Officers who review approximately 83 applications per month. We included a referral option in EAVS that allows people such as university leaders to refer applicants to the ECR program. This option has only been used 69 times since the initiation of EAVS.

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. An update of our OMB clearance is being sought to continue our use of the software.

A.2 Purpose and Use of the Information Collection

The ECR program is not a research project

This is an Extension. 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) continues to be for internal use only. Information will

continue to be reported in aggregate form without individual identifiers. The primary purpose of this ICR is to continue 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.

ECR Application and Vetting System (EAVS) Application

ECR applicant information is provided for the purpose of evaluating qualifications to serve on study sections at CSR. This PRA clearance request is to continue 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 continue to include only the ECR applicants' names and institutions, areas of expertise, training credentials, professional accomplishments, email addresses, and NIH Commons names, most of which is provided in their CVs (see Attachment 1: Screen Shots of Online Application Format). Applicants will continue to 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 was developed to gather this information from applicants via an online application. This has reduced burden on the applicant and is more efficient and cost-effective for CSR. This online system reduces staff time to process applications and increases 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 also allows for seamless provision of feedback to applicants regarding their eligibility and places those accepted into a pool of applicants who will be invited to participate in future study sections.

The ECR website (Attachment 3) provides a link to the online application. Two options continue to be provided; one allows institution administrators to refer applicants and one allows applicants to self-nominate by completing the application and uploading their CVs. Attachment 1 includes screenshots of EAVS. The application software was developed by the CSR's Information Management Branch (IMB) in collaboration with CSR ECR staff for the use by applicants for the ECR program and for 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 October 2016, a Privacy Impact Assessment was completed for the NIH CSR Early Career Reviewers Database. This is renewed annually. (See Attachment 4: ECR Program Privacy Impact Assessment for the most recent PIA.) The most recent PIA is for the continued maintenance 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 directs information into 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 apply to applicants for the ECR program.

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

EAVS allows 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.

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

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

A.5 Impact on Small Businesses or Other Small Entities

Researchers from small organizations are eligible to apply for the ECR program using EAVS. The time estimated for completion of the online application is 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 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 are provided with specific feedback on why they were not accepted. All of those not accepted 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 ECR Application and Vetting System (EAVS) fully complies 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

December 29, 2016, Volume 81, Number 250, Pages 96020-96021. There were no public comments in response to this Federal Register Notice.

Consultation with advisors regarding the program

The plan to continue to use EAVS was discussed with and approved by the Director of CSR, Richard Nakamura; Associate Director for Diversity and Workforce Development, Karyl Swartz, who directs the ECR program; the staff of the Information Management Branch of CSR who developed the online application software; and the ECR Program Advisory Group. Feedback received from Scientific Review Officers at CSR have led to minor improvements in EAVS that have either simplified or added greater clarity to instructions. In addition, as the qualifications for acceptance to the ECR program have been updated, corresponding changes have been made in EAVS.

Feedback from persons outside the agency

This application is not for a research project. 800 ECRs were surveyed in May 2016 regarding the ECR program and suggestions were solicited for improvements in the program. No recommendations were received to discontinue or to modify EAVS.

Internal Testing of EAVS

The ECR program staff have engaged in continuous quality control of all processes related to the application and vetting of applicants with EAVS. They have worked with IMB staff to make minor adjustments to the software to facilitate all processes. Since the original OMB approval of EAVS, the requirements for participation in the ECR program have changed. Corresponding changes have been made in EAVS and tested internally by ECR Program staff and CSR review staff.

NIH Agency consultation

Scientific Review Officers at the Center for Scientific Review with experience in utilizing EAVS have provided feedback on the request to continue the use of this application software system for applicants to the ECR program. They described the use of EAVS for processing applications to the ECR program as easy to use, straightforward and essential to the successful implementation of the ECR program.

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 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 12/16/16. 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 “NIH Extramural Awards and Chartered Advisory Committee (IMPAC II), Contract Information (DCIS), and Cooperative Agreement Information, HHS/NIH.” 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, Prema Nair.

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 apply to applicants for the ECR program.

To maximize the protection of their personal information, applicants are asked to register prior to completing the ECR program application. This continues to include creation of a username and password. Applicants’ CVs and additional identifying data continue to 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.

The EAVS application includes a statement regarding privacy as part of the introduction to completing the application. It indicates that the information provided will continue to 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 have also included 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 1: Statement on 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 continues to 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 do not have access to sensitive data from individual applicants.

The information 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 collects 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 continue to be collected as part of the online application. As indicated in section A.10, sensitive

information is not 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 by ECR Program Staff and 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 have been included 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 continue to 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

The current flow of applicants is approximately 90 per month. Assuming a constant rate, the ECR program should receive approximately **1080 applications per year**. Using an estimated response time of **25 minutes per application**, the **annual burden for applicants is 450 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 | 1080 | 1 | 25/60 | 450 |
| Totals | 1080 | 1080 | | 450 |

Annualized Cost to Respondents

A survey of 241,491 full-time faculty from 743 institutions published in the 2016 College And University Professional Association for Human Resources (CUPA-HR) (<https://www.higheredjobs.com/salary/salaryDisplay.cfm?SurveyID=37>) showed that assistant professors across disciplines are earning an average of \$69,404 per year for 4 year public and private schools based on a 9 month work year. This can be extrapolated to an average of \$92,539 per year based on a 12 month work year and \$44.49 per hour based on a 40 hour work week. The vast majority of New Investigators are Assistant Professors. Therefore, this number was used to calculate the annualized costs to respondents.

Based on an estimate of 1,080 applications per year, each taking 25 minutes to complete, the anticipated average annual respondent cost of the ECR online application is \$20,021. According to the report described above, the range in annualized salaries for assistant professors is quite large 106,523/12 months to \$80,433/ 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 | 1080 | 1 | 25/60 | \$44.49 | \$20,021 |
| Totals | 1080 | | | | \$20,021 |

* - Source of estimate: (<https://www.higheredjobs.com/salary/salaryDisplay.cfm?SurveyID=37>)

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

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 450 hours per year at \$54,000.

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. EAVS greatly reduces the staffing resources needed to process applications, provide feedback to applicants, and manage application data. ECR personnel costs related to the processing of applications includes 2% Program Director time, 10% Program Coordinator time, and 35% program analyst time, assuming 52 weeks per year. The estimated annual cost to the federal government for administration of the online application software is \$115,595.

| Cost Descriptions | Grade/Step | Salary | % of Effort | Fringe (if applicable) | Total Cost to Gov't |
|----------------------------------|-------------------|---------------|--------------------|-------------------------------|----------------------------|
| Federal Oversight | | | | | |
| Program Director | | \$175,306 | 2% | 35% | \$4,652 |
| Program Coordinator | GS 15-1 | \$128,082 | 10% | 35% | \$17,290 |
| | | | | | |
| Contractor Cost | | | | | |
| Program Analyst | | \$82,696 | 35% | 37% | \$39,653 |
| Travel | | | | | |
| | | | | | |
| Other Cost | | | | | |
| Annual Software Maintenance Cost | | | | | \$54,000 |
| Total | | | | | \$115,595 |

A.15 Explanation for Program Changes or Adjustments

There are no significant program changes or adjustments related to this ICR. Minor adjustments have been made in the ECR program requirements and to the EAVS application that correspond to these changes. No new personal information is collected from applicants. This ICR is an extension to use EAVS to collect applicant information and to process SRO vetting and to continue to maintain the EAVS database that stores this information.

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

We do not intend to publish information derived from applications submitted through EAVS. Data on frequency of use of EAVS are tabulated for internal use only.

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.