Suzanne H. Plimpton  
Reports Clearance Officer  
Office of the General Counsel  
National Science Foundation  
4201 Wilson Blvd.  
Arlington, VA 22230  

August 19, 2015  

Comments submitted electronically via: splimpto@nsf.gov  

Dear Ms. Plimpton,  

The Federation of American Societies for Experimental Biology (FASEB) appreciates the opportunity to comment on the revised format for interim and final performance progress reporting using the standardized Research Performance Progress Report (RPPR) developed by the Research Business Models (RBM) Interagency Working Group of the National Science & Technology Council. FASEB is composed of 27 scientific societies, collectively representing over 125,000 biological and biomedical researchers. FASEB supports solutions that significantly reduce administrative burdens associated with federally funded research, and we commend the Council’s efforts to unify reporting requirements across funding agencies.  

As noted in our May 7, 2014 comments on the proposed revision, RPPR incorporates several features that will streamline preparation of interim and final progress reports. Adoption of a standard cover page that is shared across agencies will minimize administrative burdens associated with the preparation of grant progress reports. We also supported the incorporation of data elements such as unique researcher identifiers (e.g., eRA Commons ID, ORCID), that can be used to link research activities to a disambiguated investigator profile and the corresponding SciENcv electronic biosketch. Such modifications would reduce administrative burden by linking to existing electronic records and also reduce the risk of transcription errors.  

We are concerned, however, that the overall format of the RPPR is cumbersome for reporting the outcomes of biological and biomedical research. Researchers have reported that generation of interim and final reports in the RPPR format is time consuming and the accompanying instructions lack clarity. In particular, we are concerned about the likely redundancy between the mandatory “accomplishments” reporting category and the optional categories, particularly “products,” as that includes reporting of publications, the most common output of most grants supporting biological research. We also fear that “nothing to report” will become a default response when researchers are unsure of the requested information is required. Therefore, we propose the use of a “reporting wizard” that would only show
those fields for which responses are required for a specific grant type. For instance, the reporting expectations and instructions for a training grant will be different from those for a research project grant. Customizing RPPR fields to match the specific agency and/or grant requirements would increase the likelihood that investigators will report the outcomes of interest to the agency.

FASEB commends the RBM Interagency Working Group’s efforts to streamline the progress reporting process for federally funded research. The Working Group has made great strides towards developing a system that can be used across agencies. Prior to finalization of the RPPR, we urge you to perform user testing of the form with researchers representing a variety of fields and funding agencies to ensure that the format and accompanying instructions are relevant and easily understood by the target population.

Thank you for the opportunity to provide input on this important effort. Please do not hesitate to contact me if we can provide you with additional information regarding our concerns.

Sincerely,

Parker B. Antin, PhD
FASEB President