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2005-0336-F

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FOIA MARKER

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Record Group/Collection: George H.W. Bush Presidential Records
Collection/Office of Origin: Science and Technology Policy, Office of (OSTP)
Series: Bromley, D. Allan, Files
Subseries: General Science Files

OA/ID Number: 62038
Folder ID Number: 62038-007

Folder Title:
Life Sciences: General [3 of 7] [1992]

Stack:	Row:	Section:	Shelf:	Position:
	0	0	0	0

"Document Control for Division of Life Sciences"

TYPE: ACTION DOCUMENT NUMBER: 9203123
ORIGINATOR: 02 STATUS I DIRECTORATE STATUS C

FROM: GOLDMAN, Robert D.: NORTHWESTERN UNIVERSITY MEDICAL SCHOOL

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/12/92

SUBJECT: HE IS WRITING TO SOLICIT DR. BROMLEY'S SUPPORT TO
ENSURE THE CONTINUED PARTICIPATION OF NIH IN THE
FEDERAL DEMONSTRATION PROGRAM.

DIRECTORATE STAFF
ASSIGNED: LIFE SCIENCES ASSIGNED: William Raub

ACTION STAFF
REQUIRED: AS NECESSARY ACTION: AS NECESSARY

SENDER'S DUE DATE:
OSTP DUE DATE: 10/29/92 STAFF DUE DATE 10/29/92
DATE COMPLETED: DATE COMPLETED/DEPT: 11/25/92

COPIES TO: D. Allan Bromley

WHITE HOUSE TRACKING #: CONTACT PERSON:
PHONE: EXT:
REMARKS: Dr. Raub responded to this letter as well as one addressed to him.

OSTP RECEIVED: 10/19/92
FILE: P-LIFE SCIENCES

DEPT RECEIVED: 10/20/92

CENTRAL FILES:

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF SCIENCE AND TECHNOLOGY POLICY
WASHINGTON, D.C. 20506

November 25, 1992

Dear Dr. Goldman:

Thank you for your letter to Dr. D. Allan Bromley regarding the decision by the National Institutes of Health (NIH) to discontinue its participation in one of the activities of the Federal Demonstration Project (FDP), i.e., the trial of a simplified application procedure for noncompeting continuation grants. Your disappointment at this turn of events is understandable, for the procedures by which agencies of the federal government handle noncompeting renewal awards undoubtedly include unnecessary and unproductive administrative requirements and therefore are an appropriate focus for an FDP initiative. Nevertheless, having discussed the matter at length with some of my NIH colleagues, I recognize that their decision, made in conjunction with higher-level officials of the Department of Health and Human Services (DHHS), has a strong supporting rationale.

As I understand the issue, the crux of the problem is that the streamlined FDP procedure for noncompeting renewals has failed to win strong support among the NIH funding units. My colleagues report widespread concern among program- and grants-management staff because the noncompeting renewal procedure now being tested does not generate all the information they believe they need to fulfill their stewardship responsibilities. This conclusion in turn has reinforced misgivings that senior DHHS policy officials have held since this particular trial first was proposed. Whereas many of us hoped that real-world experience with the streamlined procedure might allay the early concerns, the opposite has proved true.

Under the circumstances, with so many key staff at several different levels of DHHS disinclined to endorse the streamlined renewal process, I see no chance that the Department will adopt it as standard policy. Further pursuit of this particular FDP activity as currently designed therefore is likely to be an unproductive expenditure of energy, resources, time, and good will. Regrouping and reassessing the issue in the light of the concerns generated by the trial seems the better course.

I view this setback as unfortunate but far from lethal for FDP. The NIH decision neither tarnishes the other FDP achievements nor diminishes the importance of our fundamental goals. For my part, I will continue to be an advocate for FDP, as will many of my colleagues. That will include searching for a broadly acceptable way to address anew how we might make the noncompeting renewal process more efficient for both parties without an actual or perceived compromise of stewardship.

Sincerely yours,

A handwritten signature in cursive script that reads "Bill Raub".

William F. Raub, Ph.D.
Special Assistant for Health Affairs

Dr. Robert D. Goldman
Stephen Walter Ranson Professor
and Chairman
Department of Cell, Molecular
and Structural Biology
Northwestern University Medical School
Ward Building 7-311
303 East Chicago Avenue
Chicago, Illinois 60611-3008

"Document Control for Division of Life Sciences"

TYPE: ACTION DOCUMENT NUMBER: 9203119
ORIGINATOR: 02 STATUS I DIRECTORATE STATUS C

FROM: GREENLAND, Philip: NORTHWESTERN UNIVERSITY MEDICAL SCHOOL

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/09/92

SUBJECT: HE IS WRITING TO SOLICIT DR. BROMLEY'S ASSISTANCE IN
ENSURING THE PARTICIPATION OF NIH IN THE FEDERAL
DEMONSTRATION PROGRAM.

DIRECTORATE STAFF
ASSIGNED: LIFE SCIENCES ASSIGNED: William Raub

ACTION STAFF
REQUIRED: AS NECESSARY ACTION: AS NECESSARY

SENDER'S DUE DATE:
OSTP DUE DATE: 10/29/92 STAFF DUE DATE 10/29/92
DATE COMPLETED: DATE COMPLETED/DEPT: 11/25/92

COPIES TO: D. Allan Bromley

WHITE HOUSE TRACKING #: CONTACT PERSON:
PHONE: EXT:
REMARKS: Dr. Raub responded on behalf of Dr. Bromley as well as to his
own letter.



OSTP RECEIVED: 10/19/92
FILE: P-LIFE SCIENCES

DEPT RECEIVED: 10/20/92

CENTRAL FILES:

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF SCIENCE AND TECHNOLOGY POLICY
WASHINGTON, D.C. 20506

November 25, 1992

Dear Dr. Greenland:

Thank you for your letters to Dr. D. Allan Bromley and me regarding the decision by the National Institutes of Health (NIH) to discontinue its participation in one of the activities of the Federal Demonstration Project (FDP), i.e., the trial of a simplified application procedure for noncompeting continuation grants. Your disappointment at this turn of events is understandable, for the procedures by which agencies of the federal government handle noncompeting renewal awards undoubtedly include unnecessary and unproductive administrative requirements and therefore are an appropriate focus for an FDP initiative. Nevertheless, having discussed the matter at length with some of my NIH colleagues, I recognize that their decision, made in conjunction with higher-level officials of the Department of Health and Human Services (DHHS), has a strong supporting rationale.

As I understand the issue, the crux of the problem is that the streamlined FDP procedure for noncompeting renewals has failed to win strong support among the NIH funding units. My colleagues report widespread concern among program- and grants-management staff because the noncompeting renewal procedure now being tested does not generate all the information they believe they need to fulfill their stewardship responsibilities. This conclusion in turn has reinforced misgivings that senior DHHS policy officials have held since this particular trial first was proposed. Whereas many of us hoped that real-world experience with the streamlined procedure might allay the early concerns, the opposite has proved true.

Under the circumstances, with so many key staff at several different levels of DHHS disinclined to endorse the streamlined renewal process, I see no chance that the Department will adopt it as standard policy. Further pursuit of this particular FDP activity as currently designed therefore is likely to be an unproductive expenditure of energy, resources, time, and good will. Regrouping and reassessing the issue in the light of the concerns generated by the trial seems the better course.

I view this setback as unfortunate but far from lethal for FDP. The NIH decision neither tarnishes the other FDP achievements nor diminishes the importance of our fundamental goals. For my part, I will continue to be an advocate for FDP, as will many of my colleagues. That will include searching for a broadly acceptable way to address anew how we might make the noncompeting renewal process more efficient for both parties without an actual or perceived compromise of stewardship.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Bill Raub".

William F. Raub, Ph.D.
Special Assistant for Health Affairs

Philip Greenland, M.D.
Chairman and Dingman Professor
of Cardiology
Department of Community Health
and Preventive Medicine
Northwestern University Medical School
680 North Lake Shore Drive, Suite 1102
Chicago, Illinois 60611-4402

Northwestern University Medical School



Department of Community Health
and Preventive Medicine

680 North Lake Shore Drive
Suite 1102
Chicago, Illinois 60611-4402
(312) 908-7914
Fax (312) 908-9588

Philip Greenland, MD
Dingman Professor of Cardiology
and Chairman

October 9, 1992

D. Allan Bromley
Assistant to the President for
Science and Technology
Old Executive Office Building
Room 358
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

Dear Mr. Bromley:

I write to solicit your assistance in ensuring the continued participation of the National Institutes of Health in the noncompeting continuation demonstration of the Federal Demonstration Project (FDP). The continuation of this demonstration, with full participation of the National Institutes of Health, is consistent with the President's January 28, 1992 Memorandum for Certain Department and Agency Heads on the subject of "Reducing the Burden of Government Regulations".

As you may know, the FDP was initiated in 1988 to help eliminate unnecessary administrative burdens on sponsored research and thereby enhance the research productivity of the United States. The noncompeting continuation pilot of the Federal Demonstration Project, initiated July 15, 1990, allowed participating federal agencies to issue out year funding commitments based upon an annual progress report. Some of the participating agencies, due to legal requirements or major procedural disruption, continued the requirement for a cover page. Other documentation was required only if significant changes occurred in the size or scope of a project.

A recent survey of the 1,092 researchers impacted by the noncompeting application process perhaps best demonstrates its importance. Overall, 1,092 researchers reported time savings of 2.26 days under the noncompeting continuation demonstration of the FDP. Collectively, researchers saved 2464 days, with 90 percent of those days reinvested in scholarly activities. To provide another perspective on these "time reinvestments", it can be said that the study documents a total of 8.5 person-years of additional scholarly activities. Further applying these rates of return, it is possible to project that the overall additional investment in research activity made possible by FDP was roughly eighteen person years of research.

I appreciate your efforts in ensuring the continuation of this project of demonstrated importance to the academic community and the nation's research enterprise.

Sincerely,

Philip Greenland, M.D.
Chairman and Dingman Professor
of Cardiology

PG/thb

"Document Control for Division of Life Sciences"

TYPE: INFORMATION DOCUMENT NUMBER: 9203187
ORIGINATOR: 02 STATUS C DIRECTORATE STATUS C

FROM: TENBEAU, Peter: THE RESEARCH FOUNDATION

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/08/92

SUBJECT: RE: THE FEDERAL DEMONSTRATION PROJECT

DIRECTORATE STAFF
ASSIGNED: ASSIGNED: William Raub

ACTION STAFF
REQUIRED: ACTION: Direct Reply

SENDER'S DUE DATE:
OSTP DUE DATE: STAFF DUE DATE
DATE COMPLETED: DATE COMPLETED/DEPT: 11/25/92

COPIES TO: D. Allan Bromley
LIFE SCIENCES

WHITE HOUSE TRACKING #: CONTACT PERSON:
PHONE: EXT:
REMARKS: Dr. Raub responded to Bromley's letter as well as the one
addressed to him.

OSTP RECEIVED: 10/13/92 DEPT RECEIVED:
FILE: P-LIFE SCIENCES
CENTRAL FILES:

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF SCIENCE AND TECHNOLOGY POLICY
WASHINGTON, D.C. 20506

November 25, 1992

Dear Mr. Tenbeau:

Thank you for your letter to me regarding the decision by the National Institutes of Health (NIH) to discontinue its participation in one of the activities of the Federal Demonstration Project (FDP), i.e., the trial of a simplified application procedure for noncompeting continuation grants. Your disappointment at this turn of events is understandable, for the procedures by which agencies of the federal government handle noncompeting renewal awards undoubtedly include unnecessary and unproductive administrative requirements and therefore are an appropriate focus for an FDP initiative. Nevertheless, having discussed the matter at length with some of my NIH colleagues, I recognize that their decision, made in conjunction with higher-level officials of the Department of Health and Human Services (DHHS), has a strong supporting rationale.

As I understand the issue, the crux of the problem is that the streamlined FDP procedure for noncompeting renewals has failed to win strong support among the NIH funding units. My colleagues report widespread concern among program- and grants-management staff because the noncompeting renewal procedure now being tested does not generate all the information they believe they need to fulfill their stewardship responsibilities. This conclusion in turn has reinforced misgivings that senior DHHS policy officials have held since this particular trial first was proposed. Whereas many of us hoped that real-world experience with the streamlined procedure might allay the early concerns, the opposite has proved true.

Under the circumstances, with so many key staff at several different levels of DHHS disinclined to endorse the streamlined renewal process, I see no chance that the Department will adopt it as standard policy. Further pursuit of this particular FDP activity as currently designed therefore is likely to be an unproductive expenditure of energy, resources, time, and good will. Regrouping and reassessing the issue in the light of the concerns generated by the trial seems the better course.

I view this setback as unfortunate but far from lethal for FDP. The NIH decision neither tarnishes the other FDP achievements nor diminishes the importance of our fundamental goals. For my part, I will continue to be an advocate for FDP, as will many of my colleagues. That will include searching for a broadly acceptable way to address anew how we might make the noncompeting renewal process more efficient for both parties without an actual or perceived compromise of stewardship.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Bill Raub". The signature is fluid and cursive, with the first name "Bill" and last name "Raub" clearly distinguishable.

William F. Raub, Ph.D.
Special Assistant for Health Affairs

Mr. Peter N. Tenbeau
Director, FDP Steering Committee
The Research Foundation
of State University of New York
Contract and Grant Services
Post Office Box 9
Albany, New York 12201-0009

"Document Control for Division of Life Sciences"

TYPE: ACTION DOCUMENT NUMBER: 9203283
ORIGINATOR: 02 STATUS I DIRECTORATE STATUS C

FROM: DALLOS, Peter: ASSOCIATION FOR RESEARCH IN OTOLARYNGOLOGY

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/08/92

SUBJECT: HE IS WRITING TO ASK FOR DR. BROMLEY'S ASSISTANCE IN
ENSURING THE CONTINUED PARTICIPATION OF NIH IN THE
FEDERAL DEMONSTRATION PROGRAM.

DIRECTORATE STAFF
ASSIGNED: LIFE SCIENCES ASSIGNED: William Raub

ACTION STAFF
REQUIRED: AS NECESSARY ACTION: AS NECESSARY

SENDER'S DUE DATE:
OSTP DUE DATE: 11/16/92 STAFF DUE DATE 11/16/92
DATE COMPLETED: DATE COMPLETED/DEPT: 11/25/92

COPIES TO: D. Allan Bromley

WHITE HOUSE TRACKING #: CONTACT PERSON:
PHONE: EXT:
REMARKS: Dr. Raub responded to this letter as well as one addressed to
him.



OSTP RECEIVED: 10/30/92
FILE: P-LIFE SCIENCES

DEPT RECEIVED: 11/10/92

CENTRAL FILES:

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF SCIENCE AND TECHNOLOGY POLICY
WASHINGTON, D.C. 20506

November 25, 1992

Dear Dr. Dallos:

Thank you for your letters to Dr. D. Allan Bromley and me regarding the decision by the National Institutes of Health (NIH) to discontinue its participation in one of the activities of the Federal Demonstration Project (FDP), i.e., the trial of a simplified application procedure for noncompeting continuation grants. Your disappointment at this turn of events is understandable, for the procedures by which agencies of the federal government handle noncompeting renewal awards undoubtedly include unnecessary and unproductive administrative requirements and therefore are an appropriate focus for an FDP initiative. Nevertheless, having discussed the matter at length with some of my NIH colleagues, I recognize that their decision, made in conjunction with higher-level officials of the Department of Health and Human Services (DHHS), has a strong supporting rationale.

As I understand the issue, the crux of the problem is that the streamlined FDP procedure for noncompeting renewals has failed to win strong support among the NIH funding units. My colleagues report widespread concern among program- and grants-management staff because the noncompeting renewal procedure now being tested does not generate all the information they believe they need to fulfill their stewardship responsibilities. This conclusion in turn has reinforced misgivings that senior DHHS policy officials have held since this particular trial first was proposed. Whereas many of us hoped that real-world experience with the streamlined procedure might allay the early concerns, the opposite has proved true.

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I view this setback as unfortunate but far from lethal for FDP. The NIH decision neither tarnishes the other FDP achievements nor diminishes the importance of our fundamental goals. For my part, I will continue to be an advocate for FDP, as will many of my colleagues. That will include searching for a broadly acceptable way to address anew how we might make the noncompeting renewal process more efficient for both parties without an actual or perceived compromise of stewardship.

Sincerely yours,

A handwritten signature in cursive script that reads "Bill Raub".

William F. Raub, Ph.D.
Special Assistant for Health Affairs

Dr. Peter Dallos
John Evans Professor of Neuroscience
Northwestern University
Auditory Research Laboratory
2299 Sheridan Road, Searle Building
Evanston, Illinois 60201



3283

Association For Research In Otolaryngology

ARO

Office of the President

Peter Dallos, PhD
Northwestern University
Auditory Research Laboratory
2299 Sheridan Rd.
Searle Bldg.
Evanston, IL 60201
Phone: (708) 491-3175
FAX: (708) 491-4975

President

Peter Dallos, PhD
Evanston, IL
1992-1993

President-Elect

Robert Dobie, MD
San Antonio, TX
1992-1993

Past President

Jeffrey P. Harris, MD/PhD
San Diego, CA
1992-1993

Secretary-Treasurer

Thomas R. Van De Water, PhD
Bronx, NY
1990-1993

Editor-Historian

David J. Lim, MD
Bethesda, MD
1990-1993

Council

Sheryl Coombs, PhD
Chicago, IL
1990-1993

Charles Liberman, PhD
Boston, MA
1991-1994

Herman A. Jenkins, MD
Houston, TX
1992-1995

October 8, 1992

Dr. Allan Bromley
Assistant to the President for Science and Technology
Old Executive Office Building
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

Dear Dr. Bromley:

I am writing to you on behalf of the membership of the Association for Research in Otolaryngology. As you may know, ARO is the primary scientific organization for those concerned with hearing and balance, and has strong representation of investigators dealing with all other senses except vision. Most of our members are directly or indirectly supported by NIH grants, hence any change in the grant administration process is of vital interest to us. This note concerns a recent memo, informing participating institutions about NIH's decision to terminate its participation in the Federal Demonstration Project (FDP).

As you may know, the FDP was initiated in 1988 to help eliminate unnecessary administrative burdens on sponsored research. By all accounts, the FDP has been a resounding success.

In the ever increasing morass of proliferating regulations, paperwork and all-pervading bureaucracy, the FDP represents a glimmer of hope that some sanity may prevail in some quarters. The FDP saved investigators quite significant amounts of time allowing them to substitute scholarly activities for paperwork. What to me is even more significant, the FDP is a demonstration that the Government still has some vestigial trust in the scientific community. If NIH pulls out of this extremely popular and successful venture, it will do nothing but enhance the false perception, fueled by many unfriendly sources, that science is in crisis, that scientists cannot be trusted and that Government should oversee more of their activities. In my opinion, it is a tragic mistake for the NIH to so play into the hands of our adversaries.

Withdrawal from the FDP is also contrary to the President's January 28, 1992 directive on "Reducing the Burden of Government Regulations." I am extremely hopeful that this ill-advised move can be reversed and that you will help in reversing it.

On behalf of the ARO, I very much appreciate your effort in ensuring the continuation of the FDP, which has been of great importance to the nation's academic community.

Sincerely,

Peter Dallos
John Evans Professor of Neuroscience
Northwestern University

AAO-ARO Research Forum

September 14-15, 1992
Washington, DC

ARO Midwinter Meeting

February 7-11, 1993
St. Petersburg Beach, Florida

"Document Control for Division of Life Sciences"

TYPE: ACTION DOCUMENT NUMBER: 9203089
ORIGINATOR: 02 STATUS I DIRECTORATE STATUS C

FROM: FABER, Katherine T.: NORTHWESTERN UNIVERSITY

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/08/92

SUBJECT: SHE IS WRITING TO ASK FOR DR. BROMLEY'S ASSISTANCE
IN ENSURING THE CONTINUED PARTICIPATION OF NIH IN
THE NONCOMPETING CONTINUATION DEMONSTRATION OF THE
FEDERAL DEMONSTRATION PROJECT.

DIRECTORATE STAFF
ASSIGNED: LIFE SCIENCES ASSIGNED: William Raub

ACTION STAFF
REQUIRED: DIRECT REPLY ACTION: DIRECT REPLY

SENDER'S DUE DATE:
OSTP DUE DATE: 10/29/92 STAFF DUE DATE 10/29/92
DATE COMPLETED: DATE COMPLETED/DEPT: 11/25/92

COPIES TO: D. Allan Bromley

WHITE HOUSE TRACKING #: CONTACT PERSON:
PHONE: EXT:
REMARKS: Dr. Raub responded to this one as well as one addressed to him.

OSTP RECEIVED: 10/14/92
FILE: P-LIFE SCIENCES

DEPT RECEIVED: 10/14/92

CENTRAL FILES:

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF SCIENCE AND TECHNOLOGY POLICY
WASHINGTON, D.C. 20506

November 25, 1992

Dear Dr. Faber:

Thank you for your letters to Dr. D. Allan Bromley and me regarding the decision by the National Institutes of Health (NIH) to discontinue its participation in one of the activities of the Federal Demonstration Project (FDP), i.e., the trial of a simplified application procedure for noncompeting continuation grants. Your disappointment at this turn of events is understandable, for the procedures by which agencies of the federal government handle noncompeting renewal awards undoubtedly include unnecessary and unproductive administrative requirements and therefore are an appropriate focus for an FDP initiative. Nevertheless, having discussed the matter at length with some of my NIH colleagues, I recognize that their decision, made in conjunction with higher-level officials of the Department of Health and Human Services (DHHS), has a strong supporting rationale.

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Sincerely yours,

A handwritten signature in cursive script, appearing to read "Bill Raub".

William F. Raub, Ph.D.
Special Assistant for Health Affairs

Dr. Katherine T. Faber
Associate Dean for
Graduate Studies and Research
Robert McCormick School of
Engineering and Applied Science
Northwestern University
Technological Institute
2145 Sheridan Road
Evanston, Illinois 60208-3100

NORTHWESTERN

UNIVERSITY

2089



ROBERT R. McCORMICK SCHOOL OF
ENGINEERING AND APPLIED SCIENCE

October 8, 1992

Office of the Associate Dean
for Graduate Studies and Research

Dr. D. Allan Bromley
Assistant to the President for
Science and Technology
Old Executive Office Bldg., Room 358
1600 Pennsylvania Avenue, N.W.
Washington, DC 20550

Dear Dr. Bromley:

I write to ask your assistance in ensuring the continued participation of the National Institutes of Health in the noncompeting continuation demonstration of the Federal Demonstration Project (FDP). The continuation of this demonstration, with full participation of the National Institute of Health, is consistent with the President's January 28, 1992 Memorandum for Certain Department and Agency Heads on the subject of "Reducing the Burden of Government Regulations".

As you may know, the FDP was initiated in 1988 to help eliminate unnecessary administrative burdens on sponsored research and thereby enhance the research productivity of the United States. The noncompeting continuation pilot of the Federal Demonstration Project, initiated July 15, 1990, allowed participating federal agencies to issue out year funding commitments based upon an annual progress report. Some of the participating agencies, due to legal requirements or major procedural disruption, continued the requirement for a cover page. Other documentation was required only if significant changes occurred in the size or scope of a project.

You may be familiar with a recent survey of more than a thousand researchers impacted by the noncompeting application process. Overall, 1,092 researchers reported an average time savings of 2.26 days under the non-competing continuation demonstration of the FDP. Collectively, researchers saved 2,464 days, with 90 percent of those days reinvested in scholarly activities. To provide another perspective on these "time reinvestments", it can be said that the study documents a total of 8.5 person-years of additional scholarly activities. Further applying these rates of return, it is possible to project that the overall additional investment in research activity made possible by FDP was roughly eighteen person years of research.

I appreciate your efforts in ensuring the continuation of this project of demonstrated importance to the academic community and the nation's research enterprise.

Sincerely yours,

Katherine T. Faber

Katherine T. Faber
Associate Dean

KTF:cm

"Document Control for Division of Life Sciences"

TYPE: ACTION DOCUMENT NUMBER: 9203118
ORIGINATOR: 02 STATUS I DIRECTORATE STATUS C

FROM: LOGEMANN, Jeri A.: NORTHWESTERN UNIVERSITY

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/08/92

SUBJECT: SHE IS WRITING TO REQUEST DR. BROMLEY'S HELP IN
CONTINUING THE PARTICIPATION OF NIH IN THE FEDERAL
DEMONSTRATION PROGRAM.

DIRECTORATE STAFF
ASSIGNED: LIFE SCIENCES ASSIGNED: William Raub

ACTION STAFF
REQUIRED: AS NECESSARY ACTION: AS NECESSARY

SENDER'S DUE DATE:
OSTP DUE DATE: 10/29/92 STAFF DUE DATE 10/29/92
DATE COMPLETED: DATE COMPLETED/DEPT: 11/25/92

COPIES TO: D. Allan Bromley

WHITE HOUSE TRACKING #: CONTACT PERSON:
PHONE: EXT:
REMARKS: Dr. Raub responded to this letter as well as one addressed to
him.

OSTP RECEIVED: 10/19/92
FILE: P-LIFE SCIENCES

DEPT RECEIVED: 10/20/92

CENTRAL FILES:

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF SCIENCE AND TECHNOLOGY POLICY
WASHINGTON, D.C. 20506

November 25, 1992

Dear Dr. Logemann:

Thank you for your letters to Dr. D. Allan Bromley and me regarding the decision by the National Institutes of Health (NIH) to discontinue its participation in one of the activities of the Federal Demonstration Project (FDP), i.e., the trial of a simplified application procedure for noncompeting continuation grants. Your disappointment at this turn of events is understandable, for the procedures by which agencies of the federal government handle noncompeting renewal awards undoubtedly include unnecessary and unproductive administrative requirements and therefore are an appropriate focus for an FDP initiative. Nevertheless, having discussed the matter at length with some of my NIH colleagues, I recognize that their decision, made in conjunction with higher-level officials of the Department of Health and Human Services (DHHS), has a strong supporting rationale.

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Sincerely yours,

A handwritten signature in cursive script that reads "Bill Raub".

William F. Raub, Ph.D.
Special Assistant for Health Affairs

Jeri A. Logemann, Ph.D.
Professor and Chairman
Department of Communication
Sciences and Disorders
Northwestern University Medical School
Frances Searle Building
2299 Sheridan Road
Evanston, Illinois 60208

NORTHWESTERN UNIVERSITY
THE SCHOOL OF SPEECH

DEPARTMENT OF
COMMUNICATION SCIENCES AND DISORDERS
FRANCES SEARLE BUILDING
2299 SHERIDAN ROAD
EVANSTON, ILLINOIS 60208
PHONE: (312) 491-3066

- 3540

708

Fax: 708 491 4975

October 8, 1992

Mr. D. Allan Bromley
Assistant to the President for
Science and Technology
Old Executive Office Building, Room 358
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

Dear Mr. Bromley,

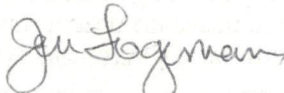
I am writing to request your help in continuing participation of the National Institutes of Health in the noncompeting demonstration of the Federal Demonstration Project (FDP). The continuation of this demonstration, with full participation of the National Institutes of Health, is consistent with the President's January 28, 1992 Memorandum for Certain Department and Agency Heads on the subject of *"Reducing the Burden of Government Regulations"*.

As you may know, the FDP was initiated in 1988 to help eliminate unnecessary administrative burdens on sponsored research and thereby enhance the research productivity of the United States. The noncompeting continuation pilot of the Federal Demonstration Project, initiated July 15, 1990, allowed participating federal agencies to issue out year funding commitments based upon an annual progress report. Some of the participating agencies, due to legal requirements or major procedural disruption, continued the requirement for a cover page. Other documentation was required only if significant changes occurred in the size or scope of a project.

A recent survey of the 1,092 researchers impacted by the noncompeting application process perhaps best demonstrates its importance. Overall, 1,092 researchers reported time savings of 2.26 days under the noncompeting continuation demonstration of the FDP. Collectively, researchers saved 2464 days, with 90 percent of those days reinvested in scholarly activities. To provide another perspective on these "time reinvestments.", it can be said that the study documents a total of 8.5 person-years of additional scholarly activities. Further applying these rates of return, it is possible to project that the overall additional investment in research activity made possible by FDP was roughly eighteen person years of research.

Your assistance in ensuring the continuation of this project which has demonstrated its important to the academic community and the nation's research enterprise is much appreciated.

Sincerely,



Jeri A. Logemann, Ph.D.
Professor and Chairman

JAL:mbr

"Document Control for Division of Life Sciences"

TYPE: ACTION DOCUMENT NUMBER: 9203120
ORIGINATOR: 02 STATUS I DIRECTORATE STATUS C

FROM: WEITZMAN, Sigmund: NORTHWESTERN UNIVERSITY MEDICAL SCHOOL

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/08/92

SUBJECT: HE IS WRITING TO SOLICIT DR. BROMLEY'S ASSISTANCE IN
ENSURING THE CONTINUED PARTICIPATION OF NIH IN THE
FEDERAL DEMONSTRATION PROGRAM.

DIRECTORATE STAFF
ASSIGNED: LIFE SCIENCES ASSIGNED: William Raub

ACTION STAFF
REQUIRED: AS NECESSARY ACTION: AS NECESSARY

SENDER'S DUE DATE:
OSTP DUE DATE: 10/29/92 STAFF DUE DATE 10/29/92
DATE COMPLETED: DATE COMPLETED/DEPT: 11/25/92

COPIES TO: D. Allan Bromley

WHITE HOUSE TRACKING #: CONTACT PERSON:
PHONE: EXT:
REMARKS: Dr. Raub responded on behalf of Dr. Bromley as well as to his
own letter.

OSTP RECEIVED: 10/19/92
FILE: P-LIFE SCIENCES

DEPT RECEIVED: 10/20/92

CENTRAL FILES:

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF SCIENCE AND TECHNOLOGY POLICY
WASHINGTON, D.C. 20506

November 25, 1992

Dear Dr. Weitzman:

Thank you for your letters to Dr. D. Allan Bromley and me regarding the decision by the National Institutes of Health (NIH) to discontinue its participation in one of the activities of the Federal Demonstration Project (FDP), i.e., the trial of a simplified application procedure for noncompeting continuation grants. Your disappointment at this turn of events is understandable, for the procedures by which agencies of the federal government handle noncompeting renewal awards undoubtedly include unnecessary and unproductive administrative requirements and therefore are an appropriate focus for an FDP initiative. Nevertheless, having discussed the matter at length with some of my NIH colleagues, I recognize that their decision, made in conjunction with higher-level officials of the Department of Health and Human Services (DHHS), has a strong supporting rationale.

As I understand the issue, the crux of the problem is that the streamlined FDP procedure for noncompeting renewals has failed to win strong support among the NIH funding units. My colleagues report widespread concern among program- and grants-management staff because the noncompeting renewal procedure now being tested does not generate all the information they believe they need to fulfill their stewardship responsibilities. This conclusion in turn has reinforced misgivings that senior DHHS policy officials have held since this particular trial first was proposed. Whereas many of us hoped that real-world experience with the streamlined procedure might allay the early concerns, the opposite has proved true.

Under the circumstances, with so many key staff at several different levels of DHHS disinclined to endorse the streamlined renewal process, I see no chance that the Department will adopt it as standard policy. Further pursuit of this particular FDP activity as currently designed therefore is likely to be an unproductive expenditure of energy, resources, time, and good will. Regrouping and reassessing the issue in the light of the concerns generated by the trial seems the better course.

I view this setback as unfortunate but far from lethal for FDP. The NIH decision neither tarnishes the other FDP achievements nor diminishes the importance of our fundamental goals. For my part, I will continue to be an advocate for FDP, as will many of my colleagues. That will include searching for a broadly acceptable way to address anew how we might make the noncompeting renewal process more efficient for both parties without an actual or perceived compromise of stewardship.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Bill Raub".

William F. Raub, Ph.D.
Special Assistant for Health Affairs

Sigmund A. Weitzman, M.D.
Chief, Division of Hematology/Oncology
Department of Medicine
Northwestern University Medical School
303 East Chicago Avenue
Chicago, Illinois 60611-3008

Northwestern University Medical School



Division of Hematology/Oncology
Department of Medicine

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(312) 908-5284
Fax (312) 908-1372

Sigmund A. Weitzman, MD
Professor of Medicine

October 8, 1992

D. Allan Bromley
Assistant to the President for
Science and Technology
Old Executive Office Building, Room 358
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

Dear Mr. Bromley:

I write to solicit your assistance in ensuring the continued participation of the National Institutes of Health in the noncompeting continuation demonstration of the Federal Demonstration Project (FDP). The continuation of this demonstration, with full participation of the National Institutes of Health, is consistent with the President's January 28, 1992 Memorandum for Certain Department and Agency Heads on the subject of "Reducing the Burden of Government Regulations."

As you may know, the FDP was initiated in 1988 to help eliminate unnecessary administrative burdens on sponsored research and thereby enhance the research productivity of the United States. The noncompeting continuation pilot of the Federal Demonstration Project, initiated July 15, 1990, allowed participating federal agencies to issue out year funding commitments based upon an annual progress report. Some of the participating agencies, due to legal requirements or major procedural disruption, continued the requirement for a cover page. Other documentation was required only if significant changes occurred in the size or scope of a project.

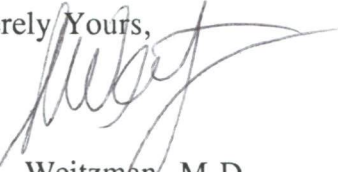
A recent survey of the 1,092 researchers impacted by the noncompeting application process perhaps best demonstrates its importance. Overall, 1,092 researchers reported time savings of 2.26 days under the noncompeting continuation demonstration of the FDP. Collectively, researchers saved 2464 days, with 90 percent of those days reinvested in scholarly activities. To provide another perspective on these "time reinvestments", it can be said that the study documents a total of 8.5 person-years of additional scholarly activities. Further applying these

Page Two -

rates of return, it is possible to project that the overall additional investment in research activity made possible by FDP was roughly eighteen person years of research.

I appreciate your efforts in ensuring the continuation of this project of demonstrated importance to the academic community and the nation's research enterprise.

Very Sincerely Yours,

A handwritten signature in dark ink, appearing to read 'S. Weitzman', with a long, sweeping horizontal stroke extending to the right.

Sigmund A. Weitzman, M.D.
Chief, Division of Hematology/Oncology

TYPE: INFORMATION

DOCUMENT NUMBER: 9203187

ORIGINATOR: 02

STATUS C

DIRECTORATE STATUS

FROM: TENBEAU, Peter: THE RESEARCH FOUNDATION

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/08/92

SUBJECT: RE: THE FEDERAL DEMONSTRATION PROJECT

DIRECTORATE STAFF
ASSIGNED: ASSIGNED:

ACTION STAFF
REQUIRED: ACTION:

SENDER'S DUE DATE:
OSTP DUE DATE: STAFF DUE DATE
DATE COMPLETED: DATE COMPLETED/DEPT:

COPIES TO: D. Allan Bromley
LIFE SCIENCES

WHITE HOUSE TRACKING #: CONTACT PERSON:
REMARKS: PHONE: EXT:

OSTP RECEIVED: 10/13/92
FILE: P-LIFE SCIENCES

DEPT RECEIVED:

CENTRAL FILES:



The Research Foundation
of State University of New York

October 8, 1992

Dr. John Diggs
Deputy Director for Extramural Research
Office of the Director
National Institutes of Health
901 Rockville Pike, Building 1, Room 144
Bethesda, MD 20892

Mr. Geoffrey E. Grant
Director
Office of Policy for Extramural
Research Administration
National Institutes of Health
901 Rockville Pike, Building 31, Room 5B50
Bethesda, MD 20892

Dear Dr. Diggs and Mr. Grant:

We are writing to express our disappointment in learning that you have terminated the involvement of NIH in the non-competing application demonstration which is part of the Federal Demonstration Project (FDP). This demonstration has been very successful and it is an important element in FDP's mission to increase research productivity.

As a participant and active supporter of the FDP, we were encouraged by the statement made by Dr. Diggs about the FDP which appeared in the August 7, 1992 edition of the "Science" magazine (page 741). It is clear from the article that the purposes of the FDP are clearly understood, i.e. to reduce paperwork and increase scientific productivity.

Therefore, since the non-competing application demonstration has proved so successful in eliminating unnecessary paperwork and since NIH's continued participation in the non-competing application demonstration is so vital to FDP's future, we strongly urge you to rescind the October 2, 1992 notice of NIH's withdrawal from this demonstration for the following reasons:

Dr. John Diggs
Mr. Geoffrey Grant

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October 8, 1992

- A documented study performed by FDP members in 1991 indicated that 1,092 PI's in universities participating in the FDP saved an average of 2.26 days per year by following the non-competing applications process. Furthermore, the survey found that of the time saved, 77% was devoted to performing research activities rather than other professional activities (a copy of this survey is enclosed).
- New and renewal proposals are sufficiently detailed to provide information as to the overall purpose and cost of the research project. If the project is funded, each annual fiscal report submitted by the grantee organization indicates the dollar expenditure level, and the annual technical report indicates scientific progress. These two reports should be sufficient to provide the basis to enable NIH staff to determine if a project is proceeding satisfactorily.
- FDP terms and conditions require that a change in Principal Investigator or a significant change in the project work scope must be approved by NIH.
- The FDP has contributed to the reduction in "bureaucratic accretion" by bringing together university and federal agency administrators to work out ways to eliminate unnecessary paperwork and thereby improve scientific productivity and reduce administrative costs. This is consistent with President Bush's January 28, 1992 Memorandum to Department and Agency Heads on the subject of Reducing the Burden of Government Regulations. If NIH abruptly withdraws from the non-competing application demonstration we fear that, because of the importance of this demonstration, a number of universities will no longer participate in the FDP. The loss of confidence could permanently cripple this worthwhile endeavor.
- Other agencies have fully adopted the provisions of the demonstration in their administrative regulations. For example, the Department of Energy has recently extended the features of this demonstration to all institutions.

Your October 2, 1992 notice of termination indicates a willingness to work with the FDP team over the next three years to redefine NIH's continuation application process. However, we question the value of reverting to the

Dr. John Diggs
Mr. Geoffrey Grant

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October 8, 1992

unnecessary, time consuming, and burdensome application process for continuation awards that was in place before the demonstration, while at the same time developing a new process. It would seem more productive to keep the demonstration in place, since all parties are now familiar with it, and work with the FDP to develop features that make it acceptable to NIH. In other words, why "throw the baby out with the bathwater". The current demonstration has proved its usefulness while at the same time maintaining proper stewardship of federal monies. Evidence of this is that other federal agencies continue to participate in this activity and DOE has extended it to all grantee institutions.

Our request is warranted for the reasons mentioned above, as well as the importance of the FDP to the entire academic community and to the nation's research enterprise. At a time when scientists need to be as productive as possible, their time should be spent in pursuit of new knowledge and not in completing unnecessary forms.

We appreciate your consideration of this request.

Sincerely,



Peter N. Tenbeau
Director
And
FDP Steering Committee
Member

Enclosure

c: Dr. Bernadine Healy
Director, National Institutes of Health
Dr. D. Allan Bromley
Asst. to President for Science and Technology
Bradley C. Johnson, Esq.
Washington Counsel to The Governor, State of N.Y.
Dr. James O. Mason
Asst. Secretary for Health, Public Health Service
Mr. Arnold Thompkins
Deputy Asst. Secretary for Management and Budget,
Department of Health and Human Services
Mr. David M. McIntosh
Director of the Council on Competitiveness
Mr. Donald Phillips
Executive Director, Government-Industry-University
Research Roundtable

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

National Institutes of Health
Bethesda, Maryland 20892

Participants Federal Demonstration Project (FDP):

We are writing to inform you that the National Institutes of Health (NIH) will not be extending the noncompeting continuation (Type 5) application pilot demonstration beyond its official conclusion on September 30, 1992. We know that this demonstration has been very important to you and that there are many stakeholders in the outcome among university faculty, administrators, and NIH staff.

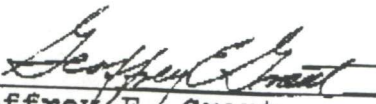
We take this step because the results of both formal participant surveys and informal assessments were quite equivocal with regard to the effectiveness of the current pilot. On the one hand, principal investigators and most university administrators favored the demonstration procedures as conserving time for research. On the other hand, many NIH grants management staff and program officers were concerned that they may not be receiving the information necessary to evaluate the administrative and financial status of the project.

Instead of continued participation in the FDP noncompeting application demonstration, we have elected to refine the noncompeting funding process over the next three years while the current official application is in effect. It is important to identify the essential indicators of stewardship (scientific progress and administration), the information that is necessary for the assessment of those indicators in the noncompeting period, and the most effective mechanisms for the transfer of the information (including electronic). It will be very desirable to continue to use the Federal Demonstration Project as a forum to test concepts and formats for data collection as we refine the procedures so that our efforts are reasonably consistent with best practices in other Federal agencies and research institutions. In fact, NIH and the other members of the Steering Committee just approved a progress report format that standardizes and streamlines the various progress report requirements among research agencies. If approved by the FDP Interagency Committee, this format will be incorporated into the NIH noncompeting continuation application on a pilot basis.

On October 1, the Division of Research Grants sent the routine noncompeting continuation applications to grantees with February 1 anniversary dates. Accordingly, we are requesting all FDP participants to submit complete, official applications for all noncompeting projects with submission dates December 1, 1992 or later (anniversary start dates of February 1, 1993 or later.) The current application is Public Health Service Form 2590 (rev. 9/91.)

Page 2 - Participants Federal Demonstration Project

NIH is very committed to improving the mutual effectiveness of research administration in order to optimize the stewardship of Federal funds and maximize the funds available for biomedical research. The Federal Demonstration Project is an essential forum for the achievement of these goals and we will continue to rely on our communications in this endeavor to refine the noncompeting funding process.



Geoffrey E. Grant
Director, Office of Policy
for Extramural Research
Administration



John W. Diggs
Deputy Director for
Extramural Research

**THE IMPACT OF NONCOMPETING CONTINUATION APPLICATIONS
WITHIN THE FEDERAL DEMONSTRATION PROJECT**

A Report of the Productivity/Assessment Task Group
of the Federal Demonstration Project

November 27, 1991

FORWARD

The results described in this report are based on a survey undertaken by the Productivity/Assessment Task Group of the Federal Demonstration Project (FDP). The FDP is being carried out with assistance from the Government-University-Industry Research Roundtable (GUIRR) of the National Academy of Sciences.

The Task Group has been fortunate in having helpful suggestions from agency and institutional representatives alike, as well as from members of the FDP Steering Committee and the Interagency Assessment Committee of GUIRR. Naming names would risk slighting someone, so suffice it to say that the authors of this report are only taking credit for putting together the materials over which the entire Task Group has labored strenuously. What has been accomplished has been done by consensus, and not every viewpoint could be fully incorporated in the finished survey product. Throughout the development of the survey instrument, expert opinion was sought. Early advice from Dr. Ward Edwards, Director of the Social Science Research Institute at the University of Southern California, provided a schematic for looking at faculty productivity and the suggestions of Dr. Detlof von Winterfeldt, Professor of Safety and Systems Management specializing in Decision Systems - also of the University of Southern California, led to the model of measuring Principal Investigator time saved and reinvested. We are also deeply indebted to Thelma Monski and the staff of the Survey Research Center of the University of California at Berkeley who gave suggestions on the overall questionnaire. To all who have participated, you have in some way made the project better.

For further information contact:

Task Group Co-Chairs

John Thurgood, Director of Contracts and Grants
University of Southern California
Stonier Hall, Room 330, University Park
Los Angeles, CA 90089-1147
(213) 740-6071

Charles Paoletti, Director, University Programs Division
Office of Naval Research
800 N. Quincy Street
Arlington, VA 22217-5000
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Task Group Staff Assistant

William Mann, Deputy Director of Contract and Grants
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Los Angeles, CA 90089-1147
(213) 740-6053

Data Analysis

Barbara Davey, EDP Specialist
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Los Angeles, CA 90089-1147
(213) 740-6063

THE IMPACT OF NONCOMPETING CONTINUATION APPLICATIONS WITHIN THE FEDERAL DEMONSTRATION PROJECT

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HIGHLIGHTS

THE IMPACT OF NONCOMPETING CONTINUATION APPLICATIONS WITHIN THE FEDERAL DEMONSTRATION PROJECT

Some of the findings of the survey:

- 1,092 PIs reported that they saved time
- Individually PIs saved an average 2.26 days which amounts to almost 1% of their annual effort
- Collectively PIs saved:
 - 2,464 days or 9.5 person-years of effort
 - of which 2,220 days or 8.5 person-years of effort
 - were reinvested in scholarly activities (90% of time saved)
 - of which 1,887 days or 7.25 person-years of effort
 - were reinvested in research (77% of time saved)
- Extrapolating from the rate of return the amounts can be multiplied by a factor of 2.5 to measure the impact on all FDP PIs
- Further extrapolating from the FDP PIs to all PIs funded by Federal sources, the numbers can be increased six-fold

EXECUTIVE SUMMARY

THE IMPACT OF NONCOMPETING CONTINUATION APPLICATIONS WITHIN THE FEDERAL DEMONSTRATION PROJECT

When we set out on our mission three years ago, we wanted to accomplish two things: expand the Demonstration to a larger National project with the same level of effectiveness and efficiency that had developed in Florida, and to confirm what had been experienced in Florida -- increased scientific productivity as a result of cutting the red tape of research administration.

We have accomplished both objectives with rather extraordinary outcomes. The project has easily scaled up to a National effort involving 28 academic institutions (four of which are large multi-campus state-wide university systems), a private research institute, 11 federal agencies, the Interagency Assessment Committee, the Government-University-Industry Research Roundtable and the Office of Management and Budget. The Florida institutions continue to be a primary site for new demonstration projects.

In Florida, we clearly saw that time was being saved by trimming administrative tasks which were not adding value to the process. What we did not have in Florida was strong empirical evidence indicating that the effort saved was translated into scholarly activities.

Not only has the project expanded successfully; it is now providing the much needed confirmation that released time is indeed being channeled into scientific and research productivity. Clearly it is no longer necessary for us to rely on a line of reasoning as to what the scientific community is doing with time that previously had been consumed by red tape.

An earlier report (THE IMPACT OF THE USE OF EXPANDED AUTHORITIES WITHIN THE FEDERAL DEMONSTRATION PROJECT - February 1, 1991) dealt with time saved and reinvested as the result of the expanded authorities. This current report, along with a study done by Task Group 2 (Applications/Proposals and Technical Reports) on the Agency side of the equation, summarizes the results of two years of streamlining, simplifying, testing and monitoring the noncompeting continuation process. The results have been encouraging. The noncompeting continuation application process saved time for 1,092 participating PIs. Though this result was not unexpected, the magnitude of the results was an unknown at the beginning of the project. Individually, PIs saved annually in excess of 2.25 days. This amounts to a 1% savings in their yearly effort. With PIs claiming they allot 10% to 20% of their time to administrative tasks required by the conditions of federal sponsorship, this savings translates to a 7.5% reduction in time spent on administrative tasks.

Collectively, participating PIs saved 2,464 days or 9.5 person-years of which 2,220 days were reinvested in scholarly work. This is a 90% reinvestment. Clearly some 1,887 days were redirected to research. In other words, in excess of 77% of saved time was reinvested in research.

It should be noted that the only agencies making full use of the noncompeting continuation application process under the FDP guidelines were NIH and ADAMHA (over 96% of the responses applied to these two agencies).

Through our participation in the project on our campuses and talking with our PIs about the outcomes they are experiencing, we are becoming increasingly aware of the tremendous amount of positive support for the work being done to improve the research funding process. Our PIs love what we are doing. We are all hearing that the effort by the Roundtable, participating agencies, participating universities and research organizations, the Interagency Assessment Committee and OMB -- is giving PIs the flexibility to make the best possible decisions about how we invest Federal research dollars.

Perhaps what we all appreciate most is what is being said about our work outside our own inner circle of participants. Many of our friends and associates are talking about how we are changing the culture. They are talking about how the pre-award and extension initiatives are assuring smooth starts and making it possible to extend where and when we should. These same folks have now experienced the benefits of carry-forward fungibility and simplified non-competing continuation applications - enriching our culture, by breaking the constraints of annual funding cycles.

We are off to a great start with much remaining to be done.

THE IMPACT OF NONCOMPETING CONTINUATION APPLICATIONS WITHIN THE FEDERAL DEMONSTRATION PROJECT

BACKGROUND

In September, 1988, representatives from the universities and research foundations selected nationally to become part of the new Federal Demonstration Project (FDP) met in Orlando, Florida. It did not take them long to fulfill William Raub's notion on productivity as presented in his paper entitled "Cutting Red Tape on Research" which appeared in the Winter 1988-89 issue of **Issues in Science and Technology**.

The quest for means to measure productivity takes the project into a complex and controversial domain. Consensus won't come easily, but the battle must be joined.

The Federal Demonstration Project will be evaluated not only on its contribution to research productivity, but also on its maintenance of standards of accountability and its efficiency in handling the administrative aspects of Federal research funding.

The task group on Productivity/Assessment met on a number of occasions to lay the ground rules, to review models for measuring productivity, and to construct data collection instruments. At this date two aspects of assessment are in place: (1) all PIs with both current FDP awards and prior awards from FDP agencies were surveyed, with all but two institutions reporting, and (2) all PIs who submitted non-competing continuation applications were asked to fill out a questionnaire. An additional survey to solicit data on the impact of the changes in documentation standards as they pertain to "relatedness", as well as other areas of interest to the Research Roundtable, the Federal agencies, the Office of Management and Budget, and the universities and colleges represented in the FDP is under consideration. This report deals only with the results of the survey item # 2. The results of item # 1 were reported elsewhere (**THE IMPACT OF THE USE OF EXPANDED AUTHORITIES WITHIN THE FEDERAL DEMONSTRATION PROJECT** - February 1, 1991).

METHODOLOGY

The ground rules under which the Productivity/Assessment task group operated were: (1) that they were to look at research productivity, not cost savings, (2) that they would evaluate both direct and indirect means to measure productivity, and (3) that they would seek faculty input and support for the methodology to be used. It was recognized that it is an especially difficult task to measure the result of changes in administrative procedures when the impact is likely to be marginal and to differ with each PI. As noted in the Foreword, professional advice was sought and utilized throughout the project. It was also agreed that this study would relate only to savings to the researchers, not to administrative assistants, secretaries, and other

support staff. However important this additional savings is, it could not be directly converted to more research time available as is the case with PI time saved.

Productivity versus Cost Savings

Once Congress settles on an overall level of Federal research support, it is the agencies and divisions within each agency which attempt to structure their research and development programs to obtain the most benefit (hopefully, long-term) for the dollar. At a given level of research support, the improvements to the system can be quantified by measuring the production of more, better, or timelier research.

Direct and Indirect Measures

More research could in part be identified with more scientific presentations, more intellectual property disclosures, more manuscripts published, etc. One objection to this approach is that it does not deal with the issue of quality but only quantity. Measures such as patents awarded, Nobel recognition, and use of the citation index may touch on the quality of research, but they have a major drawback in that there are many years which go by between the implementation of a change in the procedures and the point when that change could have an impact on any of the quality measures. Furthermore, using either the quantity or quality measures and comparing them with and without the FDP provisions, it is important to control for all of the outside variables which might have an impact on the outcome. Establishing a control group in a non-laboratory setting would have been a difficult task at best. Collecting faculty profiles or curriculum vitae pre-FDP and during FDP and comparing the two time periods was considered as an alternative, but the lack of a controlled environment would cause one to question the interpretation of any results. A similar weakness existed in attempting to compare the timeliness of final report submissions pre-FDP and during FDP.

Faculty Advice and Support

Faculty members given the opportunity to comment on alternate methodologies proposed by the Productivity/Assessment task group cautioned against trying to make the project too scientific. Given the setting, measurements were not likely to be reproducible, using historical controls were unreliable and the noise generated in the system would require an inordinate sample size for validating what were expected to be rather modest changes in outcomes due to the implementation of the "noncompeting continuation applications" process introduced as part of the FDP. One faculty member from the Dartmouth Medical School captured the feelings of many other PIs in stating that "a more honest approach would be to make the simplifying assumption that productivity is directly proportional to time available for research."

After much discussion, the task group eventually adopted this methodology of measuring the time saved by PIs due to the noncompeting continuation applications process as the first step in the assessment project. It further tested the above assumption that saved time would be reinvested in research. This report summarizes the results of this time saved/time invested model.

RESULTS

The survey findings indicate that of the 1,092 PIs impacted by the noncompeting continuation application process of the FDP, their average time saved was 2.26 days. What is singularly impressive about the results is the uniformity of responses. Whether the institution is large or small, public or private, highly research oriented or more general in approach, the FDP is acclaimed by the PIs as beneficial to research productivity.

The appendices provide further detail of the findings including a graphics display, results by institution, anecdotal material and a copy of the questionnaire.

Overall, 1,092 PIs reported time saved under the FDP project. Collectively PIs saved 2,464 days, with 2,220 (or 90%) of those days reinvested in scholarly activities and with 1,887 (or 77%) of those days reinvested in research. To provide another perspective on these "time reinvestments", it can be said that the study documents a total of 8.5 person-years of additional scholarly activities, of which 7.25 person-years was in research activity from those PIs participating in the survey. Furthermore, applying the rates of return for each institution (see Table 3 of the appendix), it is possible to project that the overall additional investment in research activity made possible by the FDP was roughly 18 person-years of research. Further applying these results to the non-FDP participants who would benefit from the noncompeting continuation application process, would provide annually an additional 108 person-years of research.

A companion study of the noncompeting continuation applications process focussing on the impact on Agency participants will be reported by Task Group 2 (Applications/Proposals and Technical Reports).

APPENDICES

TABLE 1

FDP NONCOMPETING CONTINUATION APPLICATION

HOW TIME SAVED WAS REINVESTED

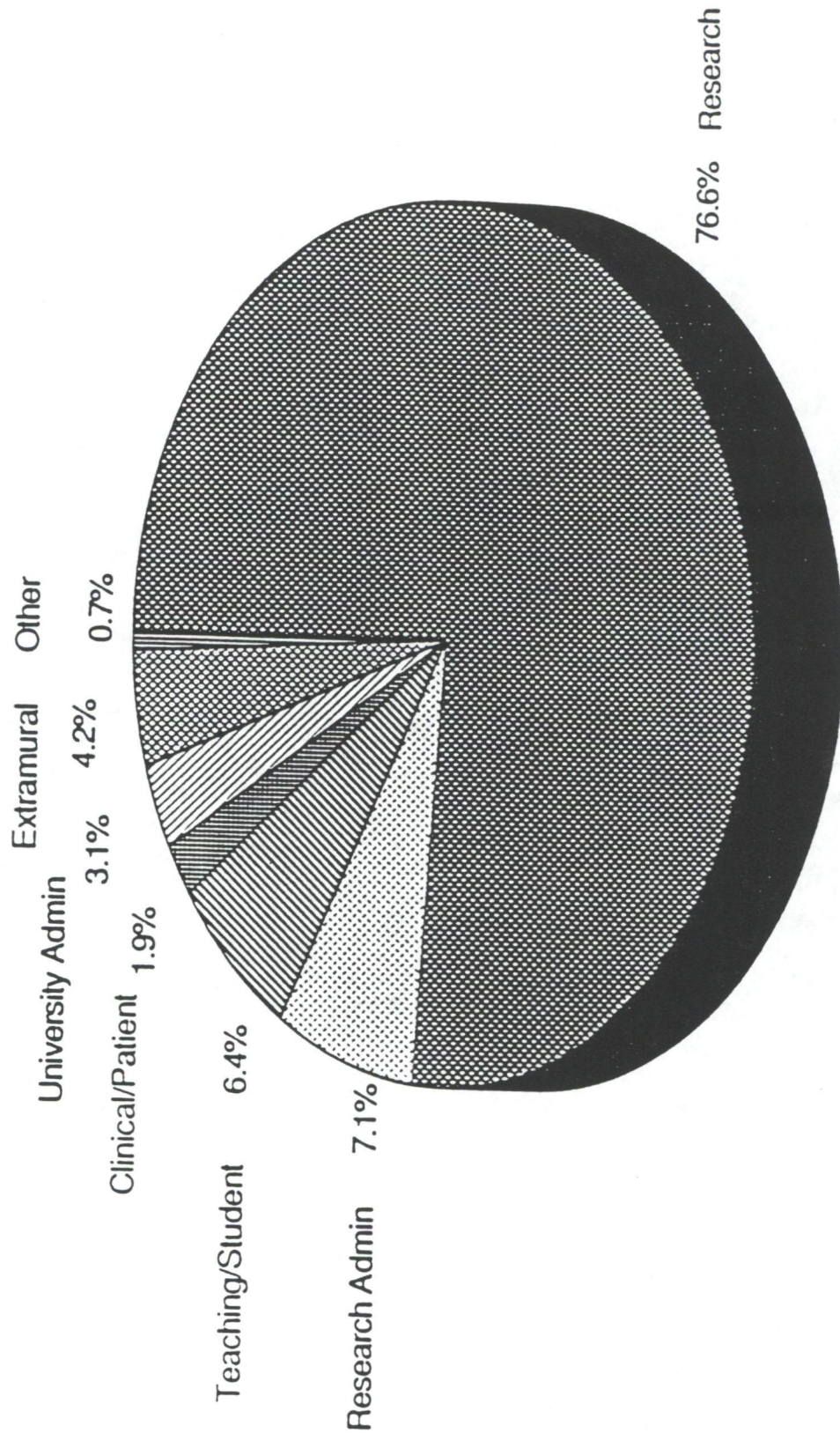


TABLE 3

INSTITUTIONAL RESPONSES	RATES OF RETURN		
	# OF QUESTIONNAIRES DISTRIBUTED	# OF QUESTIONNAIRES RETURNED	RATE OF RETURN
BAYLOR COLLEGE OF MEDICINE			.
CALIFORNIA INSTIT OF TECHNOLOGY			
CASE WESTERN RESERVE UNIV			
COLUMBIA UNIV	123	122	99%
CORNELL UNIV			
DARTMOUTH COLLEGE	73	42	58%
EMORY UNIV			
FLORIDA A&M			
FLORIDA ATLANTIC UNIV	30	6	20%
FLORIDA INTL UNIV	1	1	100%
FLORIDA STATE	69	23	33%
JOHNS HOPKINS UNIV	500	194	39%
NORTHWESTERN UNIV	63	53	84%
OHIO STATE UNIV	257	101	39%
RICE UNIV	12	8	67%
SRI, INTERNATIONAL	15	3	20%
STATE UNIV OF NEW YORK (SUNY)	163	127	78%
TEXAS A&M UNIV	59	31	53%
UNIV OF CALIFORNIA	1345	202	15%
UNIV OF CHICAGO	198	119	60%
UNIV OF CINCINNATI			
UNIV OF FLORIDA			
CENTRAL FLORIDA			
NORTH FLORIDA			
SOUTH FLORIDA			
WEST FLORIDA			
UNIV OF HAWAII		17	
UNIV OF HOUSTON	27	12	44%
UNIV OF LOWELL			
UNIV OF MIAMI			
UNIV OF MICHIGAN	275	127	46%
UNIV OF SOUTHERN CALIFORNIA	113	78	69%
UNIV OF TEXAS			
AUSTIN	8	8	100%
DALLAS	15	4	27%
HSC, HOUSTON	105	56	53%
HSC, SAN ANTONIO			
SW MED CENTER	120	113	94%
UNIV OF VIRGINIA			
UNIV OF WISCONSIN			
OVERALL RETURN RATE.	3571	1447	41%

* Baylor's rate of return could not be calculated as the survey was sent to the entire PI population

UNSOLICITED COMMENTS FROM PIs

Johns Hopkins University -

"It was wonderful to save time by submitting an abbreviated progress report. It saved considerable effort which I put to other important uses. I appreciate the way that the FDP has made my work more efficient and allowed me to direct my energies toward research instead of bureaucracy."

University of Houston -

"I very much like the FDP. The administration of my grant requires far less time and paperwork on my part than my colleagues spend on their state-funded grants. I certainly hope that the FDP proves to be a success and is implemented as a long-term policy."

University of Southern California -

"This is an excellent program. It should be adopted for all grants. The stress of preparing a noncompeting renewal is greatly reduced. I think the progress report and research plan for the coming year were much better and more complete since this was the main focus of the effort."

Constructive thoughts included improving consistency between administrative offices and between program officers within those administrative offices concerning what is required. For example, while a Columbia PI gave high marks to the Department of Energy concerning its simplified procedures, other PIs reported that Chicago and San Francisco Operations Offices continue to require detailed budgets. By and large, PIs remain very pleased with the Demonstration, although perhaps a little weary after completing two surveys.

"Document Control"

TYPE: ACTION DOCUMENT NUMBER: 9203088
ORIGINATOR: 02 STATUS I DIRECTORATE STATUS

FROM: TAKAHASHI, Joseph S.: NORTHWESTERN UNIVERSITY

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/07/92

SUBJECT: HE IS WRITING TO SOLICIT DR. BROMLEY'S ASSISTANCE IN
ENSURING THE CONTINUED PARTICIPATION OF THE NIH IN
THE NONCOMPETING DEMONSTRATION OF THE FEDERAL
DEMONSTRATION PROJECT.

DIRECTORATE STAFF
ASSIGNED: LIFE SCIENCES ASSIGNED:

ACTION STAFF
REQUIRED: DIRECT REPLY ACTION:

SENDER'S DUE DATE:
OSTP DUE DATE: 10/29/92 STAFF DUE DATE
DATE COMPLETED: DATE COMPLETED/DEPT:

COPIES TO: D. Allan Bromley

WHITE HOUSE TRACKING #: CONTACT PERSON:
PHONE: EXT:
REMARKS:

OSTP RECEIVED: 10/14/92 DEPT RECEIVED:
FILE: P-LIFE SCIENCES
CENTRAL FILES:

3098

NORTHWESTERN UNIVERSITY

October 7, 1992

Department of Neurobiology
and Physiology

2153 Sheridan Road
Evanston, Illinois 60208-3520
Telephone (708) 491-5521

Fax (708) 491-5211

Dr. Allan Bromley
Assistant to the President for Science and Technology
Old Executive Office Building
Room 358
1600 Pennsylvania Ave., NW
Washington, DC 20500

Dear Dr. Bromley:

I write to solicit your assistance in ensuring the continued participation of the National Institutes of Health in the noncompeting continuation demonstration of the Federal Demonstration Project (FDP). The continuation of this demonstration, with full participation of the National Institutes of Health, is consistent with the President's January 28, 1992 Memorandum for Certain Department and Agency Heads on the subject of "Reducing the Burden of Government Regulations".

As you may know, the FDP was initiated in 1988 to help eliminate unnecessary administrative burdens on sponsored research and thereby enhance the research productivity of the United States. The noncompeting continuation pilot of the Federal Demonstration Project, initiated July 15, 1990, allowed participating federal agencies to issue out year funding commitments based upon an annual progress report. Some of the participating agencies, due to legal requirements of major procedural disruption, continued the requirement for a cover page. Other documentation was required only if significant changes occurred in the size or scope of a project.

A recent survey of the 1,092 researchers impacted by the noncompeting application process perhaps best demonstrates its importance. Overall, 1,092 researchers reported time savings of 2.26 days under the non-competing continuation demonstration of the FDP. Collectively, researchers saved 2,464 days, with 90 percent of those days reinvested in scholarly activities. To provide another perspective on these "time reinvestments," it can be said that the study documents a total of 8.5 person-years of additional scholarly activities. Further applying these rates of return, it is possible to project that the overall additional investment in research activity made possible by FDP was roughly eighteen person years of research.

I appreciate your efforts in ensuring the continuation of this project of demonstrated importance to the academic community and the nation's research enterprise.

Sincerely yours,



Joseph S. Takahashi
Professor

JT/dk



COLLEGE OF ARTS AND SCIENCES

"Document Control"

TYPE: ACTION
ORIGINATOR: 02

STATUS I

DOCUMENT NUMBER: 9203093
DIRECTORATE STATUS

FROM: PINTO, Lawrence H.: NORTHWESTERN UNIVERSITY

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/07/92

SUBJECT: HE IS WRITING TO SOLICIT DR. BROMLEY'S ASSISTANCE IN
ENSURING THE CONTINUED PARTICIPATION OF NIH IN THE
FEDERAL DEMONSTRATION PROGRAM.

DIRECTORATE

ASSIGNED: LIFE SCIENCES

STAFF

ASSIGNED:

ACTION

REQUIRED: DIRECT REPLY

STAFF

ACTION:

SENDER'S DUE DATE:

OSTP DUE DATE: 10/29/92

STAFF DUE DATE

DATE COMPLETED:

DATE COMPLETED/DEPT:

COPIES TO: D. Allan Bromley

WHITE HOUSE TRACKING #:

CONTACT PERSON:

PHONE:

EXT:

REMARKS:

OSTP RECEIVED: 10/14/92

DEPT RECEIVED:

FILE: P-LIFE SCIENCES

CENTRAL FILES:

3093

NORTHWESTERN UNIVERSITY

October 7, 1992

Department of Neurobiology
and Physiology

2153 Sheridan Road
Evanston, Illinois 60208-3520
Telephone (708) 491-5521

Fax (708) 491-5211

D. Allan Bromley
Assistant to the President for
Science and Technology
Old Executive Office Building
Room 358
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Dear Mr. Bromley

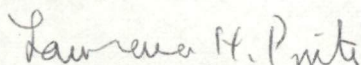
I write to solicit your assistance in ensuring the continued participation of the National Institutes of Health in the noncompeting continuation demonstration of the Federal Demonstration Project (FDP). The continuation of this demonstration, with full participation of the National Institutes of Health, is consistent with the President's January 28, 1992 Memorandum for Certain Department and Agency Heads on the subject of "Reducing the Burden of Government Regulations".

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A recent survey of the 1,092 researchers impacted by the noncompeting application process perhaps best demonstrates its importance. Overall, 1092 researchers reported time savings of 2.26 days under the noncompeting continuation of the FDP. Collectively, researchers saved 2464 days, with 90 percent of those days reinvested in scholarly activities. To provide another perspective on these "time reinvestments", it can be said that the study documents a total of 8.5 person-years of additional scholarly activities. Further applying these rates of return, it is possible to project that the overall additional investment in research activity made possible by FDP was roughly eighteen person years of research.

I appreciate your efforts in ensuring the continuation of this project of demonstrated importance to the academic community and the nation's research enterprise.

Sincerely



Lawrence H. Pinto
Professor



COLLEGE OF ARTS AND SCIENCES

"Document Control"

TYPE: ACTION DOCUMENT NUMBER: 9203092
ORIGINATOR: 02 STATUS I DIRECTORATE STATUS

FROM: TUREK, Fred W.: NORTHWESTERN UNIVERSITY

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/07/92

SUBJECT: HE IS WRITING TO SOLICIT DR. BROMLEY'S ASSISTANCE IN
ENSURING THE CONTINUED PARTICIPATION OF NIH IN THE
FEDERAL DEMONSTRATION PROJECT.

DIRECTORATE STAFF
ASSIGNED: LIFE SCIENCES ASSIGNED:

ACTION STAFF
REQUIRED: DIRECT REPLY ACTION:

SENDER'S DUE DATE:
OSTP DUE DATE: 10/29/92 STAFF DUE DATE
DATE COMPLETED: DATE COMPLETED/DEPT:

COPIES TO: D. Allan Bromley

WHITE HOUSE TRACKING #: CONTACT PERSON:
PHONE: EXT:
REMARKS:

OSTP RECEIVED: 10/15/92
FILE: P-LIFE SCIENCES

DEPT RECEIVED:

CENTRAL FILES:

3092

NORTHWESTERN UNIVERSITY

October 7, 1992

Department of Neurobiology
and Physiology

2153 Sheridan Road
Evanston, Illinois 60208-3520
Telephone (708) 491-5521

Fax (708) 491-5211

D. Allan Bromley
Assistant to the President for
Science and Technology
Old Executive Office Building
Room 358
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Dear Mr. Bromley

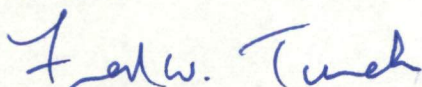
I write to solicit your assistance in ensuring the continued participation of the National Institutes of Health in the noncompeting continuation demonstration of the Federal Demonstration Project (FDP). The continuation of this demonstration, with full participation of the National Institutes of Health, is consistent with the President's January 28, 1992 Memorandum for Certain Department and Agency Heads on the subject of "Reducing the Burden of Government Regulations".

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I appreciate your efforts in ensuring the continuation of this project of demonstrated importance to the academic community and the nation's research enterprise.

Sincerely



Fred W. Turek
Professor & Chairman

FWT/pj



COLLEGE OF ARTS AND SCIENCES

"Document Control"

TYPE: ACTION

DOCUMENT NUMBER: 9203373

ORIGINATOR: 02

STATUS I

DIRECTORATE STATUS

FROM: UDANI, M.H.: NORTHWESTERN UNIVERSITY

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/06/92

SUBJECT: HE IS WRITING TO ASK FOR DR. BROMLEY'S ASSISTANCE IN
ENSURING THE CONTINUED PARTICIPATION OF NIH IN THE
FEDERAL DEMONSTRATION PROGRAM.

DIRECTORATE

STAFF

ASSIGNED: LIFE SCIENCES

ASSIGNED:

ACTION

STAFF

REQUIRED: AS NECESSARY

ACTION:

SENDER'S DUE DATE:

OSTP DUE DATE: 11/16/92

STAFF DUE DATE

DATE COMPLETED:

DATE COMPLETED/DEPT:

COPIES TO: D. Allan Bromley

WHITE HOUSE TRACKING #:

CONTACT PERSON:

REMARKS:

PHONE:

EXT:

OSTP RECEIVED: 10/30/92

DEPT RECEIVED:

FILE: P-LIFE SCIENCES

CENTRAL FILES:

3373

NORTHWESTERN UNIVERSITY
DENTAL SCHOOL

DIVISION OF DENTAL HYGIENE
240 EAST HURON STREET
CHICAGO, ILLINOIS 60611

RECEIVED

92 OCT 30 P 1:14

OSTP
MAIL ROOM

October 6, 1992

Mr. D. Allan Bromley
Assistant to the President for Science and Technology
Old Executive Office Building
Room 358
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

Dear Mr. Bromley:

I write to solicit your assistance in ensuring the continued participation of the National Institutes of Health in the noncompeting continuation demonstration of the Federal Demonstration Project (FDP). The continuation of this demonstration, with full participation of the National Institutes of Health, is consistent with the President's January 28, 1992 Memorandum for Certain Department and Agency Heads on the subject of "Reducing the Burden of Government Regulations".

As you may know, the FDP was initiated in 1988 to help eliminate unnecessary administrative burdens on sponsored research and thereby enhance the research productivity of the United States. The noncompeting continuation pilot of the Federal Demonstration Project, initiated July 15, 1990, allowed participating federal agencies to issue out year funding commitments based upon an annual progress report. Some of the participating agencies, due to legal requirements or major procedural disruption, continued the requirement for a cover page. Other documentation was required only if significant changes occurred in the size or scope of a project.

D. Allan Bromley
Page 2
October 6, 1992

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I appreciate your efforts in ensuring the continuation of this project of demonstrated importance to the academic community and the nations' research enterprise.

Sincerely,

A handwritten signature in dark ink, appearing to read "M. H. Udani", with a horizontal line drawn underneath the name.

Dr. M. H. Udani, D.D.S.
Division of Oral Diagnosis

MHU:bo

TYPE: ACTION DOCUMENT NUMBER: 9203115
ORIGINATOR: 02 STATUS I DIRECTORATE STATUS

FROM: DUBOCOVICH, Margarita: NORTHWESTERN UNIVERSITY MEDICAL SCHOOL

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/05/92

SUBJECT: SHE IS WRITING TO SOLICIT DR. BROMLEY'S ASSISTANCE
IN ENSURING THE CONTINUED PARTICIPATION OF THE
NATIONAL INSTITUTES OF HEALTH IN THE FEDERAL
DEMONSTRATION PROGRAM.

DIRECTORATE STAFF
ASSIGNED: LIFE SCIENCES ASSIGNED:

ACTION STAFF
REQUIRED: AS NECESSARY ACTION:

SENDER'S DUE DATE:
OSTP DUE DATE: 10/29/92 STAFF DUE DATE
DATE COMPLETED: DATE COMPLETED/DEPT:

COPIES TO: D. Allan Bromley

WHITE HOUSE TRACKING #: CONTACT PERSON:
PHONE: EXT:
REMARKS:

OSTP RECEIVED: 10/19/92 DEPT RECEIVED:
FILE: P-LIFE SCIENCES

CENTRAL FILES:

3115

Northwestern University Medical School

Margarita L. Dubocovich, Ph.D.
Associate Professor of Pharmacology

Department of Pharmacology
303 East Chicago Avenue
Chicago, Illinois 60611

Phone: (312) 503-8005
FAX: (312) 503-2334
Email: dubo@casbah.acnw.nwu.edu

October 5, 1992

Mr. D. Allan Bromley
Special Assistant to President for
Science & Technology
Old Executive Office Bldg.
17th St. and Pennsylvania Ave., N.W.
Washington, DC 20500

Dear Mr. Bromley:

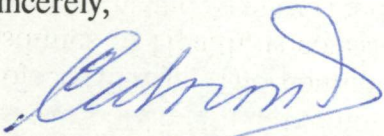
I write to solicit your assistance in ensuring the continued participation of the National Institutes of Health in the noncompeting continuation demonstration of the Federal Demonstration Project (FDP). The continuation of this demonstration, with full participation of the National Institutes of Health, is consistent with the President's January 28, 1992 Memorandum for Certain Department and Agency Heads on the subject of "Reducing the Burden of Government Regulations".

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I appreciate your efforts in ensuring the continuation of this project of demonstrated importance to the academic community and the nation's research enterprise.

Sincerely,



Margarita L. Dubocovich, Ph.D.

The McGaw Medical Center of Northwestern University

TYPE: INFORMATION

DOCUMENT NUMBER: 9203186

ORIGINATOR: 02

STATUS C

DIRECTORATE STATUS

FROM: SIEGEL, Barbara and STAFFORD, Ingrid: NORTHWESTERN UNIVERSITY

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/02/92

SUBJECT: RE: THE FEDERAL DEMONSTRATION PROJECT

DIRECTORATE
ASSIGNED:

STAFF
ASSIGNED:

ACTION
REQUIRED:

STAFF
ACTION:

SENDER'S DUE DATE:

OSTP DUE DATE:
DATE COMPLETED:

STAFF DUE DATE
DATE COMPLETED/DEPT:

COPIES TO: D. Allan Bromley
LIFE SCIENCES

WHITE HOUSE TRACKING #:

CONTACT PERSON:
PHONE:

EXT:

REMARKS:

OSTP RECEIVED: 10/13/92
FILE: P-LIFE SCIENCES

DEPT RECEIVED:

CENTRAL FILES:

NORTHWESTERN

UNIVERSITY

3186

OFFICE OF RESEARCH AND SPONSORED PROGRAMS

October 2, 1992

Dr. John W. Diggs
Deputy Director for Extramural Research
Office of the Director
National Institutes of Health
901 Rockville Pike, Building 1/144
Bethesda, Maryland 20892

Mr. Geoffrey E. Grant
Director
Office of Policy for Extramural
Research Administration
National Institutes of Health
901 Rockville Pike
Bethesda, Maryland 20892

Dear Dr. Diggs and Mr. Grant:

We write as concerned Federal Demonstration Project (FDP) Institutional Representatives and urge you to reconsider NIH's involvement in the non-competing continuation application demonstration. As you both know, NIH's withdrawal from this demonstration comes as a significant blow to the participating universities and threatens the very existence of the FDP.

During the FDP's history, a spirit of cooperation has grown among the diverse participating groups. Although we haven't always agreed, we have attempted to reach consensus and move forward. It is clear that there was a difference of opinion on the value and effectiveness of the non-competing demonstration, with university faculty overwhelmingly supportive and NIH staffers split in their support. We expected the result of this impasse to be a revised demonstration, hammered out by an FDP working group, that would provide NIH with the information needed without dramatically adding to the Principal Investigators' paperwork burden. This has always been the goal of the FDP.

I know that you have received numerous letters, including one from the President of Northwestern University (copy attached), pointing out the value of this demonstration; reciting statistics from the university survey; reminding you of the President's January 28th, 1992 memorandum on reducing the burden of government regulations and your commitment to the FDP as highlighted in the August 7, 1992 Science article. Instead of

Dr. John W. Diggs
Mr. Geoffrey E. Grant
page2

reiterating those points we would simply like to encourage you to reconsider your decision. We are willing to work with NIH to develop a new demonstration. Going back to the status quo is demoralizing at best. Given the difficult times in which we find ourselves, the FDP offers a unique opportunity for dialogue and change. Let's not kill this opportunity.

Sincerely,

Barbara E. Siegel

Barbara E. Siegel
Associate Director
and
Member of the FDP
Steering Committee

Ingrid S. Stafford

Ingrid Stafford
Controller
and
Member of the FDP
Committee of the Whole

cc: Dr. D. Allan Bromley
Assistant to the President for Science and Technology
Dr. James O. Mason
Assistant Secretary for Health
Mr. Arnold R. Thompkins
Deputy Asst. Secretary for Management and Budget
Dr. Bernadine Healey
Director, NIH
Mr. Donald Phillips
Executive Director, GUIRR Roundtable

N O R T H W E S T E R N
U N I V E R S I T Y

OFFICE OF THE PRESIDENT

September 30, 1992

Dr. John W. Diggs
Deputy Director for Extramural Research
National Institutes of Health
9000 Rockville Pike, Building 1/144
Bethesda, Maryland 20892

Dear Dr. Diggs:

As President of a Federal Demonstration Project (FDP) University, I was pleased to see your support of the FDP initiative in the August 7, 1992 Science article entitled "HHS Starts Audit of Grant Fund Use". As you pointed out, flexibility for researchers and a reduction in the administrative paperwork burden are key elements that should be maintained to ensure maximum research productivity.

However, I was dismayed to find out on Monday of this week that NIH is contemplating termination of its involvement in the Non-Competing Application demonstration under the Federal Demonstration Project. I urge you to reconsider. Although the demonstration received mixed reviews within NIH, faculty members at FDP participating universities were overwhelmingly supportive. The attached summary sheet points out that 1,092 PIs collectively saved 9.5 person-years of effort of which 8.5 person-years (90%) was reinvested in scholarly activities.

This demonstration is considered the centerpiece of the FDP by university participants and NIH's involvement in it has been critical. All other key federal agencies have either adopted the demonstration or have procedures in place that are even less bureaucratic in nature. For example, as a result of the President's January 28, 1992 memorandum on "Reducing the Burden of Government Regulations", the Department of Energy rewrote its non-competing application guidelines to conform with the FDP demonstration. The proposed changes were published in the June 24 FR and the final rule in the September 3, 1992 FR.

It is my understanding that the FDP university representatives are anxious to work with NIH to continue the current non-competing continuation demonstration, or, to modify the demonstration to address the concerns of NIH staff. Either

October 1, 1992

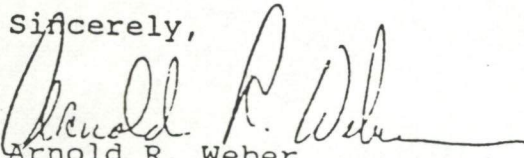
Page Two

Dr. John W. Diggs
Deputy Director for Extramural Research

option would be more in the spirit of cooperation which has been central to the FDP than termination of NIH's involvement in the demonstration.

I appreciate your consideration of this request. Continuation of this project is important to the academic community and its relationship with NIH as well as the nation's research enterprise.

Sincerely,

A handwritten signature in dark ink, appearing to read "Arnold R. Weber", with a long horizontal flourish extending to the right.

Arnold R. Weber
President
Northwestern University

HIGHLIGHTS

THE IMPACT OF NONCOMPETING CONTINUATION APPLICATIONS WITHIN THE FEDERAL DEMONSTRATION PROJECT

Some of the findings of the survey:

- 1,092 PIs reported that they saved time
- Individually PIs saved an average 2.26 days which amounts to almost 1% of their annual effort
- Collectively PIs saved:
 - 2,464 days or 9.5 person-years of effort
 - of which 2,220 days or 8.5 person-years of effort
 - were reinvested in scholarly activities (90% of time saved)
 - of which 1,887 days or 7.25 person-years of effort
 - were reinvested in research (77% of time saved)
- Extrapolating from the rate of return the amounts can be multiplied by a factor of 2.5 to measure the impact on all FDP PIs
- Further extrapolating from the FDP PIs to all PIs funded by Federal sources, the numbers can be increased six-fold

"Document Control for Division of Life Sciences"

TYPE: ACTION DOCUMENT NUMBER: 9203092
ORIGINATOR: 02 STATUS I DIRECTORATE STATUS C

FROM: TUREK, Fred W.: NORTHWESTERN UNIVERSITY

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/07/92

SUBJECT: HE IS WRITING TO SOLICIT DR. BROMLEY'S ASSISTANCE IN
ENSURING THE CONTINUED PARTICIPATION OF NIH IN THE
FEDERAL DEMONSTRATION PROJECT.

DIRECTORATE STAFF
ASSIGNED: LIFE SCIENCES ASSIGNED: William Raub

ACTION STAFF
REQUIRED: DIRECT REPLY ACTION: DIRECT REPLY

SENDER'S DUE DATE:
OSTP DUE DATE: 10/29/92 STAFF DUE DATE 10/29/92
DATE COMPLETED: DATE COMPLETED/DEPT: 11/25/92

COPIES TO: D. Allan Bromley

WHITE HOUSE TRACKING #: CONTACT PERSON:
PHONE: EXT:
REMARKS: Dr. Raub responded to this letter as well as one addressed to
him.

OSTP RECEIVED: 10/15/92
FILE: P-LIFE SCIENCES

DEPT RECEIVED: 10/14/92

CENTRAL FILES:

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF SCIENCE AND TECHNOLOGY POLICY
WASHINGTON, D.C. 20506

November 25, 1992

Dear Dr. Turek:

Thank you for your letters to Dr. D. Allan Bromley and me regarding the decision by the National Institutes of Health (NIH) to discontinue its participation in one of the activities of the Federal Demonstration Project (FDP), i.e., the trial of a simplified application procedure for noncompeting continuation grants. Your disappointment at this turn of events is understandable, for the procedures by which agencies of the federal government handle noncompeting renewal awards undoubtedly include unnecessary and unproductive administrative requirements and therefore are an appropriate focus for an FDP initiative. Nevertheless, having discussed the matter at length with some of my NIH colleagues, I recognize that their decision, made in conjunction with higher-level officials of the Department of Health and Human Services (DHHS), has a strong supporting rationale.

As I understand the issue, the crux of the problem is that the streamlined FDP procedure for noncompeting renewals has failed to win strong support among the NIH funding units. My colleagues report widespread concern among program- and grants-management staff because the noncompeting renewal procedure now being tested does not generate all the information they believe they need to fulfill their stewardship responsibilities. This conclusion in turn has reinforced misgivings that senior DHHS policy officials have held since this particular trial first was proposed. Whereas many of us hoped that real-world experience with the streamlined procedure might allay the early concerns, the opposite has proved true.

Under the circumstances, with so many key staff at several different levels of DHHS disinclined to endorse the streamlined renewal process, I see no chance that the Department will adopt it as standard policy. Further pursuit of this particular FDP activity as currently designed therefore is likely to be an unproductive expenditure of energy, resources, time, and good will. Regrouping and reassessing the issue in the light of the concerns generated by the trial seems the better course.

I view this setback as unfortunate but far from lethal for FDP. The NIH decision neither tarnishes the other FDP achievements nor diminishes the importance of our fundamental goals. For my part, I will continue to be an advocate for FDP, as will many of my colleagues. That will include searching for a broadly acceptable way to address anew how we might make the noncompeting renewal process more efficient for both parties without an actual or perceived compromise of stewardship.

Sincerely yours,

A handwritten signature in cursive script that reads "Bill Raub".

William F. Raub, Ph.D.
Special Assistant for Health Affairs

Dr. Fred W. Turek
Professor and Chairman
Department of Neurobiology
and Physiology
Northwestern University
2153 Sheridan Road
Evanston, Illinois 60208-3250

"Document Control for Division of Life Sciences"

TYPE: ACTION DOCUMENT NUMBER: 9203093
ORIGINATOR: 02 STATUS I DIRECTORATE STATUS C

FROM: PINTO, Lawrence H.: NORTHWESTERN UNIVERSITY

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/07/92

SUBJECT: HE IS WRITING TO SOLICIT DR. BROMLEY'S ASSISTANCE IN
ENSURING THE CONTINUED PARTICIPATION OF NIH IN THE
FEDERAL DEMONSTRATION PROGRAM.

DIRECTORATE STAFF
ASSIGNED: LIFE SCIENCES ASSIGNED: William Raub

ACTION STAFF
REQUIRED: DIRECT REPLY ACTION: DIRECT REPLY

SENDER'S DUE DATE:
OSTP DUE DATE: 10/29/92 STAFF DUE DATE 10/29/92
DATE COMPLETED: DATE COMPLETED/DEPT: 11/25/92

COPIES TO: D. Allan Bromley

WHITE HOUSE TRACKING #: CONTACT PERSON:
PHONE: EXT:
REMARKS: Dr. Raub responded to this letter as well as one addressed to
him.

OSTP RECEIVED: 10/14/92
FILE: P-LIFE SCIENCES

DEPT RECEIVED: 10/14/92

CENTRAL FILES:

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF SCIENCE AND TECHNOLOGY POLICY
WASHINGTON, D.C. 20506

November 25, 1992

Dear Dr. Pinto:

Thank you for your letters to Dr. D. Allan Bromley and me regarding the decision by the National Institutes of Health (NIH) to discontinue its participation in one of the activities of the Federal Demonstration Project (FDP), i.e., the trial of a simplified application procedure for noncompeting continuation grants. Your disappointment at this turn of events is understandable, for the procedures by which agencies of the federal government handle noncompeting renewal awards undoubtedly include unnecessary and unproductive administrative requirements and therefore are an appropriate focus for an FDP initiative. Nevertheless, having discussed the matter at length with some of my NIH colleagues, I recognize that their decision, made in conjunction with higher-level officials of the Department of Health and Human Services (DHHS), has a strong supporting rationale.

As I understand the issue, the crux of the problem is that the streamlined FDP procedure for noncompeting renewals has failed to win strong support among the NIH funding units. My colleagues report widespread concern among program- and grants-management staff because the noncompeting renewal procedure now being tested does not generate all the information they believe they need to fulfill their stewardship responsibilities. This conclusion in turn has reinforced misgivings that senior DHHS policy officials have held since this particular trial first was proposed. Whereas many of us hoped that real-world experience with the streamlined procedure might allay the early concerns, the opposite has proved true.

Under the circumstances, with so many key staff at several different levels of DHHS disinclined to endorse the streamlined renewal process, I see no chance that the Department will adopt it as standard policy. Further pursuit of this particular FDP activity as currently designed therefore is likely to be an unproductive expenditure of energy, resources, time, and good will. Regrouping and reassessing the issue in the light of the concerns generated by the trial seems the better course.

I view this setback as unfortunate but far from lethal for FDP. The NIH decision neither tarnishes the other FDP achievements nor diminishes the importance of our fundamental goals. For my part, I will continue to be an advocate for FDP, as will many of my colleagues. That will include searching for a broadly acceptable way to address anew how we might make the noncompeting renewal process more efficient for both parties without an actual or perceived compromise of stewardship.

Sincerely yours,

A handwritten signature in cursive script that reads "Bill Raub".

William F. Raub, Ph.D.
Special Assistant for Health Affairs

Dr. Lawrence H. Pinto
Professor
Department of Neurobiology
and Physiology
Northwestern University
2153 Sheridan Road
Evanston, Illinois 60208-3250

"Document Control for Division of Life Sciences"

TYPE: ACTION DOCUMENT NUMBER: 9203088
ORIGINATOR: 02 STATUS I DIRECTORATE STATUS C

FROM: TAKAHASHI, Joseph S.: NORTHWESTERN UNIVERSITY

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/07/92

SUBJECT: HE IS WRITING TO SOLICIT DR. BROMLEY'S ASSISTANCE IN
ENSURING THE CONTINUED PARTICIPATION OF THE NIH IN
THE NONCOMPETING DEMONSTRATION OF THE FEDERAL
DEMONSTRATION PROJECT.

DIRECTORATE STAFF
ASSIGNED: LIFE SCIENCES ASSIGNED: William Raub

ACTION STAFF
REQUIRED: DIRECT REPLY ACTION: DIRECT REPLY

SENDER'S DUE DATE:
OSTP DUE DATE: 10/29/92 STAFF DUE DATE 10/29/92
DATE COMPLETED: DATE COMPLETED/DEPT: 11/25/92

COPIES TO: D. Allan Bromley

WHITE HOUSE TRACKING #: CONTACT PERSON:
PHONE: EXT:
REMARKS: Dr. Raub responded to this one as well as one addressed to him.

OSTP RECEIVED: 10/14/92
FILE: P-LIFE SCIENCES

DEPT RECEIVED: 10/14/92

CENTRAL FILES:

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF SCIENCE AND TECHNOLOGY POLICY
WASHINGTON, D.C. 20506

November 25, 1992

Dear Dr. Takahashi:

Thank you for your letters to Dr. D. Allan Bromley and me regarding the decision by the National Institutes of Health (NIH) to discontinue its participation in one of the activities of the Federal Demonstration Project (FDP), i.e., the trial of a simplified application procedure for noncompeting continuation grants. Your disappointment at this turn of events is understandable, for the procedures by which agencies of the federal government handle noncompeting renewal awards undoubtedly include unnecessary and unproductive administrative requirements and therefore are an appropriate focus for an FDP initiative. Nevertheless, having discussed the matter at length with some of my NIH colleagues, I recognize that their decision, made in conjunction with higher-level officials of the Department of Health and Human Services (DHHS), has a strong supporting rationale.

As I understand the issue, the crux of the problem is that the streamlined FDP procedure for noncompeting renewals has failed to win strong support among the NIH funding units. My colleagues report widespread concern among program- and grants-management staff because the noncompeting renewal procedure now being tested does not generate all the information they believe they need to fulfill their stewardship responsibilities. This conclusion in turn has reinforced misgivings that senior DHHS policy officials have held since this particular trial first was proposed. Whereas many of us hoped that real-world experience with the streamlined procedure might allay the early concerns, the opposite has proved true.

Under the circumstances, with so many key staff at several different levels of DHHS disinclined to endorse the streamlined renewal process, I see no chance that the Department will adopt it as standard policy. Further pursuit of this particular FDP activity as currently designed therefore is likely to be an unproductive expenditure of energy, resources, time, and good will. Regrouping and reassessing the issue in the light of the concerns generated by the trial seems the better course.

I view this setback as unfortunate but far from lethal for FDP. The NIH decision neither tarnishes the other FDP achievements nor diminishes the importance of our fundamental goals. For my part, I will continue to be an advocate for FDP, as will many of my colleagues. That will include searching for a broadly acceptable way to address anew how we might make the noncompeting renewal process more efficient for both parties without an actual or perceived compromise of stewardship.

Sincerely yours,

A handwritten signature in cursive script that reads "Bill Raub".

William F. Raub, Ph.D.
Special Assistant for Health Affairs

Dr. Joseph S. Takahashi
Professor
Department of Neurobiology
and Physiology
Northwestern University
2153 Sheridan Road
Evanston, Illinois 60208-3250

"Document Control for Division of Life Sciences"

TYPE: ACTION DOCUMENT NUMBER: 9203121
ORIGINATOR: 02 STATUS I DIRECTORATE STATUS C

FROM: KLEIN, William: NORTHWESTERN UNIVERSITY

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/07/92

SUBJECT: HE IS WRITING TO SOLICIT DR. BROMLEY'S SUPPORT IN
ENSURING THE CONTINUED PARTICIPATION OF NIH IN THE
FEDERAL DEMONSTRATION PROGRAM.

DIRECTORATE STAFF
ASSIGNED: LIFE SCIENCES ASSIGNED: William Raub

ACTION STAFF
REQUIRED: AS NECESSARY ACTION: AS NECESSARY

SENDER'S DUE DATE:
OSTP DUE DATE: 10/29/92 STAFF DUE DATE 10/29/92
DATE COMPLETED: DATE COMPLETED/DEPT: 11/25/92

COPIES TO: D. Allan Bromley

WHITE HOUSE TRACKING #: CONTACT PERSON:
PHONE: EXT:
REMARKS: Dr. Raub responded to this letter as well as one addressed to
him.

OSTP RECEIVED: 10/19/92
FILE: P-LIFE SCIENCES

DEPT RECEIVED: 10/20/92

CENTRAL FILES:

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF SCIENCE AND TECHNOLOGY POLICY
WASHINGTON, D.C. 20506

November 25, 1992

Dear Dr. Klein:

Thank you for your letters to Dr. D. Allan Bromley and me regarding the decision by the National Institutes of Health (NIH) to discontinue its participation in one of the activities of the Federal Demonstration Project (FDP), i.e., the trial of a simplified application procedure for noncompeting continuation grants. Your disappointment at this turn of events is understandable, for the procedures by which agencies of the federal government handle noncompeting renewal awards undoubtedly include unnecessary and unproductive administrative requirements and therefore are an appropriate focus for an FDP initiative. Nevertheless, having discussed the matter at length with some of my NIH colleagues, I recognize that their decision, made in conjunction with higher-level officials of the Department of Health and Human Services (DHHS), has a strong supporting rationale.

As I understand the issue, the crux of the problem is that the streamlined FDP procedure for noncompeting renewals has failed to win strong support among the NIH funding units. My colleagues report widespread concern among program- and grants-management staff because the noncompeting renewal procedure now being tested does not generate all the information they believe they need to fulfill their stewardship responsibilities. This conclusion in turn has reinforced misgivings that senior DHHS policy officials have held since this particular trial first was proposed. Whereas many of us hoped that real-world experience with the streamlined procedure might allay the early concerns, the opposite has proved true.

Under the circumstances, with so many key staff at several different levels of DHHS disinclined to endorse the streamlined renewal process, I see no chance that the Department will adopt it as standard policy. Further pursuit of this particular FDP activity as currently designed therefore is likely to be an unproductive expenditure of energy, resources, time, and good will. Regrouping and reassessing the issue in the light of the concerns generated by the trial seems the better course.

I view this setback as unfortunate but far from lethal for FDP. The NIH decision neither tarnishes the other FDP achievements nor diminishes the importance of our fundamental goals. For my part, I will continue to be an advocate for FDP, as will many of my colleagues. That will include searching for a broadly acceptable way to address anew how we might make the noncompeting renewal process more efficient for both parties without an actual or perceived compromise of stewardship.

Sincerely yours,

A handwritten signature in cursive script that reads "Bill Raub".

William F. Raub, Ph.D.
Special Assistant for Health Affairs

Dr. William L. Klein
Professor
Department of Neurobiology
and Physiology
Northwestern University
2153 Sheridan Road
Evanston, Illinois 60208

TYPE: ACTION
ORIGINATOR: 02

DOCUMENT NUMBER: 9203121
DIRECTORATE STATUS

STATUS I

FROM: KLEIN, William: NORTHWESTERN UNIVERSITY

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/07/92

SUBJECT: HE IS WRITING TO SOLICIT DR. BROMLEY'S SUPPORT IN
ENSURING THE CONTINUED PARTICIPATION OF NIH IN THE
FEDERAL DEMONSTRATION PROGRAM.

DIRECTORATE STAFF
ASSIGNED: LIFE SCIENCES ASSIGNED:

ACTION STAFF
REQUIRED: AS NECESSARY ACTION:

SENDER'S DUE DATE:
OSTP DUE DATE: 10/29/92 STAFF DUE DATE
DATE COMPLETED: DATE COMPLETED/DEPT:

COPIES TO: D. Allan Bromley

WHITE HOUSE TRACKING #: CONTACT PERSON:
REMARKS: PHONE: EXT:

OSTP RECEIVED: 10/19/92
FILE: P-LIFE SCIENCES

DEPT RECEIVED:

CENTRAL FILES:

NORTHWESTERN UNIVERSITY

Department of Neurobiology
and Physiology2153 Sheridan Road
Evanston, Illinois 60208-3520
Telephone (708) 491-5521

Fax (708) 491-5211

October 7, 1992

Dr. Allan Bromley
Assistant to the President for Science and Technology
Old Executive Office Building
Room 358
1600 Pennsylvania Ave., NW
Washington, DC 20500

Dear Dr. Bromley:

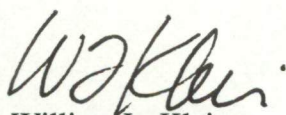
I write to solicit your assistance in ensuring the continued participation of the National Institutes of Health in the noncompeting continuation demonstration of the Federal Demonstration Project (FDP). The continuation of this demonstration, with full participation of the National Institutes of Health, is consistent with the President's January 28, 1992 Memorandum for Certain Department and Agency Heads on the subject of "Reducing the Burden of Government Regulations".

As you may know, the FDP was initiated in 1988 to help eliminate unnecessary administrative burdens on sponsored research and thereby enhance the research productivity of the United States. The noncompeting continuation pilot of the Federal Demonstration Project, initiated July 15, 1990, allowed participating federal agencies to issue out year funding commitments based upon an annual progress report. Some of the participating agencies, due to legal requirements of major procedural disruption, continued the requirement for a cover page. Other documentation was required only if significant changes occurred in the size or scope of a project.

A recent survey of the 1,092 researchers impacted by the noncompeting application process perhaps best demonstrates its importance. Overall, 1,092 researchers reported time savings of 2.26 days under the non-competing continuation demonstration of the FDP. Collectively, researchers saved 2,464 days, with 90 percent of those days reinvested in scholarly activities. To provide another perspective on these "time reinvestments," it can be said that the study documents a total of 8.5 person-years of additional scholarly activities. Further applying these rates of return, it is possible to project that the overall additional investment in research activity made possible by FDP was roughly eighteen person years of research.

I appreciate your efforts in ensuring the continuation of this project of demonstrated importance to the academic community and the nation's research enterprise.

Sincerely yours,


William L. Klein
Professor



"Document Control for Division of Life Sciences"

TYPE: ACTION DOCUMENT NUMBER: 9203373
ORIGINATOR: 02 STATUS I DIRECTORATE STATUS C

FROM: UDANI, M.H.: NORTHWESTERN UNIVERSITY

TO: DR. D.A. BROMLEY

DATE OF
CORRESPONDENCE: 10/06/92

SUBJECT: HE IS WRITING TO ASK FOR DR. BROMLEY'S ASSISTANCE IN
ENSURING THE CONTINUED PARTICIPATION OF NIH IN THE
FEDERAL DEMONSTRATION PROGRAM.

DIRECTORATE STAFF
ASSIGNED: LIFE SCIENCES ASSIGNED: William Raub

ACTION STAFF
REQUIRED: AS NECESSARY ACTION: AS NECESSARY

SENDER'S DUE DATE:
OSTP DUE DATE: 11/16/92 STAFF DUE DATE 11/16/92
DATE COMPLETED: DATE COMPLETED/DEPT: 11/25/92

COPIES TO: D. Allan Bromley

WHITE HOUSE TRACKING #: CONTACT PERSON:
PHONE: EXT:
REMARKS: Dr. Raub responded to Bromley's incoming as well as the letter
addressed to him.

OSTP RECEIVED: 10/30/92
FILE: P-LIFE SCIENCES

DEPT RECEIVED: 11/10/92

CENTRAL FILES:



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF SCIENCE AND TECHNOLOGY POLICY
WASHINGTON, D.C. 20506

November 25, 1992

Dear Dr. Udani:

Thank you for your letter to Dr. D. Allan Bromley and me regarding the decision by the National Institutes of Health (NIH) to discontinue its participation in one of the activities of the Federal Demonstration Project (FDP), i.e., the trial of a simplified application procedure for noncompeting continuation grants. Your disappointment at this turn of events is understandable, for the procedures by which agencies of the federal government handle noncompeting renewal awards undoubtedly include unnecessary and unproductive administrative requirements and therefore are an appropriate focus for an FDP initiative. Nevertheless, having discussed the matter at length with some of my NIH colleagues, I recognize that their decision, made in conjunction with higher-level officials of the Department of Health and Human Services (DHHS), has a strong supporting rationale.

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Sincerely yours,

A handwritten signature in cursive script, appearing to read "Bill Raub".

William F. Raub, Ph.D.
Special Assistant for Health Affairs

M. H. Udani, D.D.S.
Division of Oral Diagnosis
Department of Dental Hygiene
Northwestern University Dental School
240 East Huron Street
Chicago, Illinois 60611