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Darrell G. Kirch, M.D.
President

January 8, 2008

Suzanne H. Plimpton
Reports Clearance Officer
Division of Administrative Services
National Science Foundation
4201 Wilson Blvd
Arlington, VA 22230
splimpton@nsf.gov

Re: Research Performance Progress Reporting; Request for Public Comment, 72 FR 63629-31

Dear Ms. Plimpton:

The Association of American Medical Colleges (AAMC) is grateful to the National Science Foundation and the Research Business Models (RBM) Subcommittee of the National Science and Technology Council's Committee on Science for the opportunity to comment on the proposed standardized format for Research Performance Progress Reports (RPPR) on Federal research grants. The AAMC represents all 126 accredited U.S. allopathic medical schools, some 400 teaching hospitals and health systems, and 89 academic and professional societies. Our member institutions perform nearly 60% of the extramural research sponsored by the National Institutes of Health, and the views expressed here are primarily from the perspective of investigators supported on Public Health Service awards.

The AAMC supports the thoughtful comments of the Council on Governmental Relations¹, which has closely followed the deliberations of the RBM and relevant activities, and which had commented on the earlier draft RPPR. In addition, we distributed the Nov. 9 *Federal Register* notice to research deans and other senior research officials at our member institutions. In general, respondents supported, as does the AAMC, the goal of standardizing a format for interim research progress reports across federal agencies for the purposes of simplifying or streamlining reporting procedures. No concerns were expressed about the categories or elements for the mandatory and optional information sought in the new format.

We have insufficient response to estimate the extent of the additional administrative burden imposed by the RPPR or to provide informed proposals for reducing this burden, but we need to

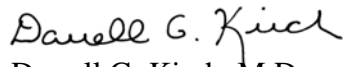
¹ Letter of Anthony P. DeCrappeo to Suzanne Plimpton, January 7, 2008.

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caution that respondents uniformly believed that the requested information in total would “substantially” add to the already prodigious paperwork burden under which our investigators labor. The AAMC thus shares COGR’s overriding concern for the extent to which agencies may mandate “optional” reporting or create further requirements.

We have encouraged investigators and research administrators to respond to NSF directly about the notice, which we hope will further provide constructive information on revising and further simplifying the proposed standard format.

Sincerely,


Darrell G. Kirch, M.D.

cc: Norka Ruiz-Bravo, Ph.D.
Co-chair, Research Business Models Subcommittee