

Oversight at NSF's Operating Large Facilities

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- Chartered by Congress in 1991 to provide rigorous objective advice and analysis to Office of Science and Technology Policy (OSTP) and other Executive Branch agencies, offices, and councils
- Provide analyses of national science and technology issues of interest to OSTP and other Executive Branch agencies
- IDA began operating the Science and Technology Policy Institute (STPI) in 2003



Presentation Outline

- Project Background
- Study questions
- Approach/project schedule
- Findings by Study Question
- Recommendations
- Discussion/Questions

Project Background

- NSF sponsored STPI to examine oversight issues related to operating large facilities
- First time such a study had been attempted
 - Challenge for NSF and STPI of identifying and gathering data for first time
- Facilities Working Group (POs) defined study questions November 2011 (next slide)
- Study completed June-August 2012

Study Questions

- Central Question: What steps can be taken to streamline NSF oversight review of operating facilities?
- Sub-questions:
 - What are the different assessments (particularly including reviews but also including site visits and audits) that occur during the operational phase across NSF facilities, and by which NSF units?
 - What are the goals for these assessments (including: what decisions must be made on the basis of each), how do they sequence, and where are there overlaps in goals and timing?
 - On a representative case basis, what are the typical resource cost factors, particularly including person-time, associated with preparing for, executing, evaluating and acting on recommendations of reviews?
 - Are there important differences in review/oversight approaches that depend on the features/attributes of the facilities?

Approach Summary

Study Questions	Interviews with Program Officers (Case Studies)	Interviews with Awardees (Case Studies)	Analysis of Cooperative Agreements (all operating facilities)
1. What are the different assessments (particularly including reviews but also including site visits and audits) that occur during the operational phase across NSF facilities, and by which NSF units?			√
2. Are there important differences in review/oversight approaches that depend on the features/attributes of the facilities?			✓
3. What are the goals for these assessments (including what decisions must be made on the basis of each), how do they sequence, and where are there overlaps in goals and timing?	√	√	
4. On a representative case basis, what are the typical resource cost factors, particularly including person-time, associated with preparing for, executing, evaluating, and acting on recommendations of reviews?	√	√	
Central Question: What steps can be taken to streamline NSF oversight review of operating facilities? Note: Questions were reordered from the original	✓	✓	✓

Note: Questions were reordered from the original list for ease of presentation.

Scope of Oversight Considered

- Clear interest in NSF reviews, including BSR
- PO interviews showed many using reports in oversight
- Guidance led to limiting to programmatic oversight (exclude audits) except BSR
- Internal governance vs. oversight? Oversight if:
 - Required by CA
 - PO participates or receives reports from body
 - Awardee considers it part of NSF oversight

Facilities Chosen for Case Studies

Facility Sites Mobile Budget (FY12, \$M) Directorate Division Atacama Large Millimeter Array/National Radio \$72 R&RA, Astronomy Observatory 1/12 N/N \$3 MREFC MPS AST EarthScope 1600 N \$26.2 GEO EAR Incorporated Research Institutions for Seismology 150 N \$11.3 GEO EAR Integrated Ocean Drilling						
Atacama Large Millimeter Array/National Radio \$72 R&RA, Astronomy Observatory 1/12 N/N \$3 MREFC MPS AST EarthScope 1600 N \$26.2 GEO EAR Incorporated Research Institutions for Seismology 150 N \$11.3 GEO EAR	Yearly Operations					
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Institutions for Seismology 150 N \$11.3 GEO EAR						
Integrated Ocean Drilling	IA					
Program 1 Y \$38.9 GEO OCE	IN					
Laser Interferometer						
Gravitational-wave \$30.5 R&RA,	\$30.5 R&RA,					
Observatory 2 N \$21 MREFC MPS PHY	-					
National Optical Astronomy						
Observatory 2 N \$25.5 MPS AST	IA					
\$8 R&RA ,						
National Solar Observatory 8 N \$10M MREFC, MPS AST	IA					
Network for Earthquake						
Engineering Simulation 14 N \$20.5 ENG CMMI						

Note: facilities anonymized in results slides



FINDINGS



Q1: What are the different assessments (particularly including reviews but also including site visits and audits) that occur during the operational phase across NSF facilities, and by which NSF units?

Q2: Are there important differences in review/oversight approaches that depend on the features/attributes of the facilities?

What are the different assessments across facilities?

- Documents examined:
 - Cooperative Agreements and Contracts
 - Programmatic Terms and Conditions
 - General Financial and Administrative Terms and Conditions
 - Supplemental FATC for Managers of Large Facilities and FFRDCs
 - Project Solicitations
 - Governance documents (for international collaborations)
 - Input from case studies

Facilities use different language to describe oversight

- Generally three kinds of oversight:
 - NSF-organized reviews
 - Reports submitted to the NSF
 - Internal governance conducted by the awardee
- Within these categories, oversight procedures covering similar content still had different names
 - Necessitated creation of a taxonomy

Creation of a Taxonomy for Oversight

Example taxonomy for NSF-organized reviews:

Review Category	Description	Terms found in CAs
Program	A comprehensive review including science, often reviewing project planning documents.	Program review panel, review of science and facility programs, site visits
Operations	A review focused on facility operation or technical operation.	Operations merit review, merit review site visit of facility operations, operations and maintenance review, maintenance and operations review
Management	A review focused on the overall management of the facility and the performance of the management organization.	Management performance review, interim management review, review of management and operations, in-depth review of management, review of management performance
Transition	A review covering the transition between awardees or stages of the project.	Transition Review
BSR	An NSF Business Systems Review.	Business Systems Review
Proposal	A proposal review in preparation for a renewal.	(Not included in CAs)
Other	Other reviews; largely those without enough detail provided to categorize properly.	On-site review, annual review, review

Some CAs provide flexibility in oversight requirements

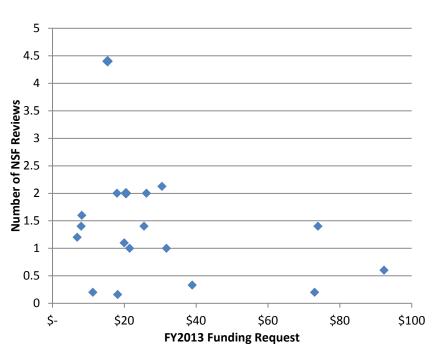
- Frequency requirements are not always absolute: 10 of 18 facilities use "at least" to specify frequency
- Five facilities require the BSR "as deemed necessary"
- Some facilities have other language for flexibility (allowing content and scheduling of review to be determined during the award, combining a quarterly report with an annual report, allowing the final report to take the place of the annual report for the final year, etc)

NSF's oversight is unique to each facility

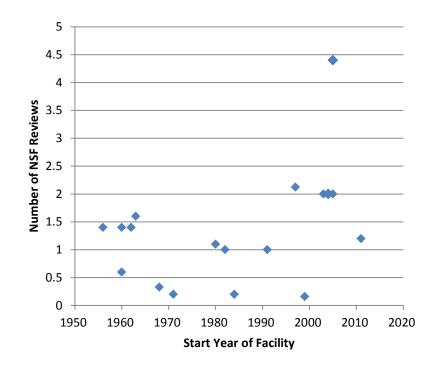
- Different CAs require different types of reviews at different frequencies
- All facilities require a retrospective annual report
- Most (but not all) CAs require a forwardlooking annual program plan
- Internal governance very facility-specific

No trends based on size or age

Weak correlation between facility size (as measured by funding request) and annualized number of reviews



Weak correlation between facility age and annualized number of reviews



Directorates/Divisions can have similar requirements

- Only trends at Division and Directorate level
 - Networked facilities in ENG facilities tend to have multiple reviews per year due to structure
 - AST facilities tend to have common annual program review, 5-year management review, and internal governance similarities
- Many potential reasons for differences:
 - tradition, facility structure, awardee preferences,
 PO preferences
 - Determining actual reasons requires further study



Q3: What are the goals for these assessments (including: what decisions must be made on the basis of each), how do they sequence, and where are there overlaps in goals and timing?

1 Scope

2 Timing

Findings: Goals of Oversight

- NSF oversight includes different activities to different parties
 - Awardees often considered governance bodies to be oversight
 - Not consistent across facilities even within Divisions/Directorates
 - More study needed across more facilities

Are There Overlaps in Scope?

- Perceptions highly varied between POs and awardees; roughly half said no overlap
- BSRs and renewal proposals seen as highly burdensome (even though less time invested than in other types)

Facility	PO	Awardee
1	Yes, BSR/Mgmt	Yes, Internal/Mgmt
2	Yes, BSR/Mgmt, Mgmt/Renew Yes BSR/Mgmt	
3	No overlap	No overlap
4	No overlap	Yes, Ops/Internal
5	Yes, BSR/Mgmt	Yes, Program/Internal
6	No overlap	Yes, BSR/A133 Audits
7	No overlap	No overlap
8	Yes, BSR/Mgmt	Yes, Program/Internal

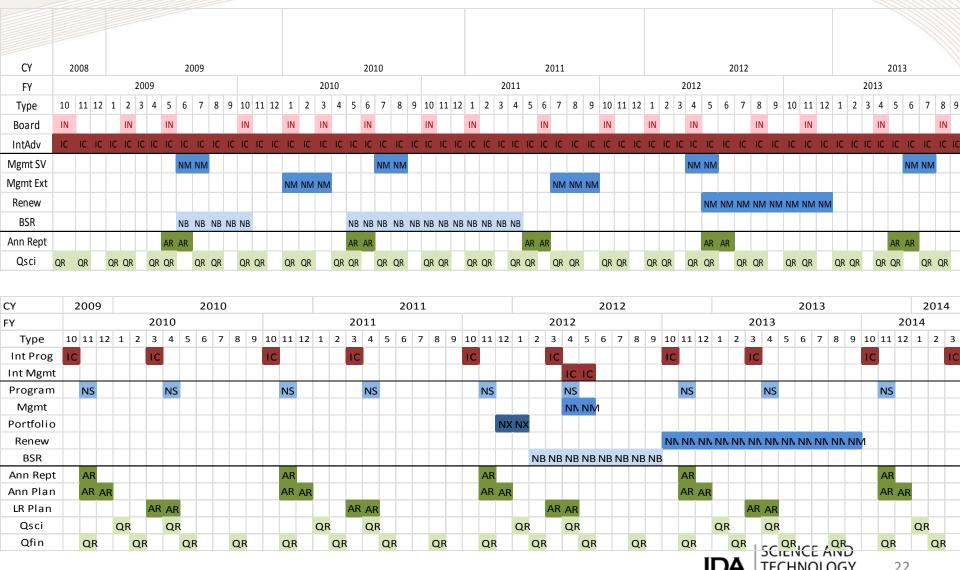
Other Scope Findings

- Link between programmatic reviews and recompetition decision is unclear
- Review charges show considerable variation in types of questions and level of detail
 - Level of detail probably a function of history, previous review results
 - Is more detail helpful?
- Most POs would welcome guidance from LFO to reduce overlap
 - Particularly related to overlap with BSR
 - Guidance needed on point of management reviews

Timing: Findings

- Considerable temporal overlap between multiple reviews and between reviews, reports, and internal oversight
 - All case studies showed some overlap
 - Most often with BSR and renewal process
 - Burden different at different times of process
- POs try to avoid such timing issues but not always possible
 - Combining reviews/reports
 - Postponing reviews

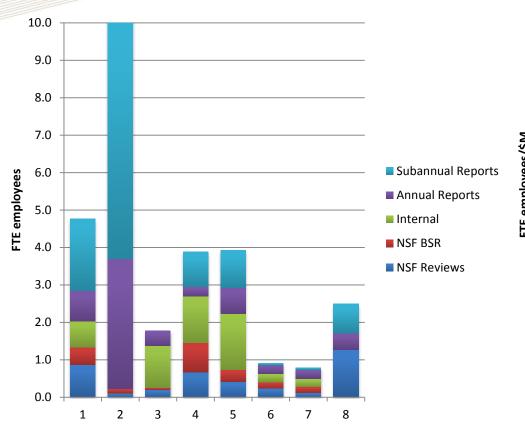
Timing: Examples

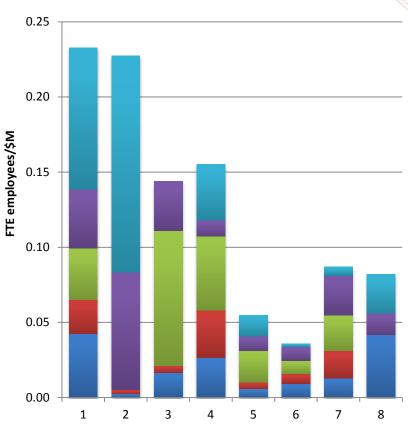




Q4: On a representative case basis, what are the typical resource cost factors, particularly including person-time, associated with preparing for, executing, evaluating, and acting on recommendations of reviews?

Substantial awardee time involved with NSF oversight, 1 to 10 FTEs



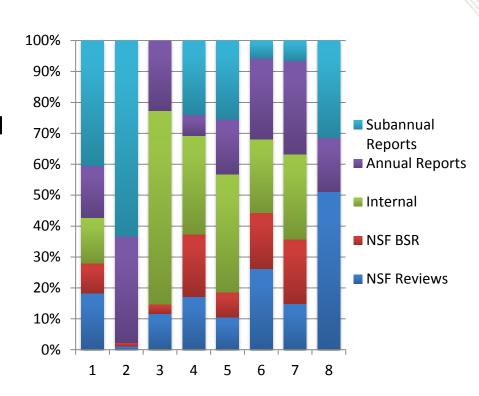


Person-time Between Facilities

- Some variability based on facility age
 - Could account for trends within Directorates
 - Number of required reviews not correlated to age, but older facilities tended to have lower estimated burden
- Caveat: small sample size and mostly estimates

Awardee Person-time Between Categories

- Reporting largest time sink (51% average)
 - Compare 14% NSF reviews, 11% internal
 - Some facilities consider subannual reports essential for management
- Large variation between facilities
 - Reporting 20%-95%
 - Reviews <5%-50%</p>
 - Internal 0%-60%
- Most awardee comments on BSR/renewal
 - Different staff involved (director less involved in subannual reporting)
 - More pressure (renewal/recompetition)



RECOMMENDATIONS



Study Recommendations (1)

- Standardize oversight terminology and scopes
 - LFO working with Directorates and Divisions
 - Will help share best practices
- Clearly communicate oversight requirements to facilities during the development of CAs
 - Insert language for flexibility where appropriate
- To the extent possible, schedule oversight upfront (during CA development) to avoid overlap

Study Recommendations (2)

- Consider internal oversight in total oversight burden
 - POs, Directorates, and LFO should include these activities in scheduling and designing oversight
- Conduct further study to understand how internal governance activities could contribute to NSF oversight goals
- Clarify the role of management reviews in the context of recompetition decisions
 - Discuss need and purpose of management reviews if recompetition decision made prior to or apart from review

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Questions

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