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United States General Accounting Office
Washington, D.C. 20548

Resources, Community, and
Economic Development Division

B-282729

July 20, 1999

The Honorable Dick Armey
Majority Leader
House of Representatives

The Honorable Dan Burton
Chairman, Committee on Government Reform
House of Representatives

The Honorable Fred Thompson
Chairman, Committee on Governmental Affairs
United States Senate

Subject: Observations on the National Science Foundation's Fiscal Year 2000 Performance Plan

As you requested, we have reviewed and evaluated the fiscal year 2000 performance plans for the 24 Chief Financial Officers (CFO) Act agencies that were submitted to Congress as required by the Government Performance and Results Act of 1993 (Results Act). Enclosure I to this letter provides our observations on the fiscal year 2000 performance plan for the National Science Foundation (NSF). Enclosure II lists management challenges NSF's Office of the Inspector General (OIG) identified that face the agency and the applicable goals and measures in the fiscal year 2000 annual performance plan.

Our objectives were to (1) assess the usefulness of the agency's plan for decisionmaking and (2) identify the degree of improvement the agency's fiscal year 2000 performance plan represents over the fiscal year 1999 plan. Our observations were generally based on the requirements of the Results Act, guidance to agencies from the Office of Management and Budget (OMB) for developing the plan (OMB Circular A-11, Part 2), our knowledge of NSF's operations and programs, and our observations on NSF's fiscal year 1999 performance plan. Our summary report on the CFO Act agencies' fiscal year 2000 plans contains a complete discussion of our objectives, scope, and methodology.¹

¹ Managing for Results: Opportunities for Continued Improvements in Agencies' Performance Plans (GAO/GGD/AIMD-99-215, July 20, 1999).

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As agreed, unless you announce the contents of this letter earlier, we plan no further distribution until 30 days from the date of the letter. The major contributors to this report were Robin M. Nazzaro and Diane B. Raynes. Please call me on (202) 512-3841 if you or your staff have any questions.

A handwritten signature in black ink, appearing to read "Victor S. Rezendes". The signature is fluid and cursive, with the first name being the most prominent.

Victor S. Rezendes
Director, Energy,
Resources, and Science

Enclosures - 2

Observations on the National Science Foundation's Performance Plan for Fiscal Year 2000

The National Science Foundation's (NSF) fiscal year 2000 annual performance plan will be of general usefulness to decisionmakers. The plan provides a general picture of intended performance across the agency, a general discussion of the strategies and resources the agency will use to achieve its goals, and limited confidence that agency's performance information will be credible. While the plan identifies crosscutting efforts with other agencies, it does not provide clear information on the linkages between the NSF budget and its performance goals, which will be key for congressional reviewers. NSF provides a matrix documenting the relative extent to which NSF functions, such as "research project support" and "education and training," support its goals such as the "connections between discoveries and their use in service to society." But there is no direct linkage between specific budget activities such as "U.S. Polar Research Program" or "graduate education" and NSF's performance goals. Figure 1 highlights the plan's major strengths and key weaknesses to be noted as NSF seeks to make additional improvements to its plan.

Figure 1: Major Strengths and Key Weaknesses of NSF's Fiscal Year 2000 Annual Performance Plan

Major Strengths

- Uses an alternative format to describe type and level of performance
- Provides additional outcome oriented goals
- Links strategies to specific program goals and describes how strategies contribute to the achievement of those goals
- Identifies crosscutting efforts with other related federal programs

Key Weaknesses

- Provides limited discussion of capital, human and financial resources
- Lacks clear linkages between the budget and performance goals
- Provides limited confidence in the validation and verification of data

The fiscal year 2000 performance plan indicates moderate progress in addressing the weaknesses that we identified in our assessment of the fiscal year 1999 performance plan. In reviewing the fiscal year 1999 plan, we observed that there was insufficient detail on crosscutting programs, external factors, strategies and resources needed to achieve goals, and data verification and validation. Among the improvements in the fiscal year 2000 plan are additional information on crosscutting efforts and external factors. Regarding crosscutting efforts, NSF describes both formal and informal agreements with other agencies. For example, under its goal of "discoveries at and across the frontier of science and engineering," NSF supports research activities with the Department of Energy at the large hadron collider in Switzerland and with the National Aeronautics and Space Administration at its space-based and ground-based astronomy facilities. NSF also improved its plan by describing external factors that could affect performance. For example, NSF describes the necessary

commitment on the part of school districts, schools, and their faculty to modifying their approaches to education in order to enhance achievement for the NSF performance goal of "improved achievement in mathematics and science skills needed by all Americans." Furthermore, NSF officials told us that if they believe work funded through a grant cannot be reliably completed, they may stop funding for the award. While this may not improve performance, it may mitigate the continued use of funds for unproductive activities. Improvements that still need to be made to the performance plan are more detailed discussions of the resources needed to achieve goals and further elaboration on the procedures to assess the reliability and validity of data used to assess goal achievement.

The Agency's Performance Plan Provides a General Picture of Intended Performance Across the Agency

While NSF's performance plan provides a general picture of intended performance across the agency, there are still inconsistencies in the information supporting each performance goal, and weaknesses that we identified in the fiscal year 1999 plan remain. The plan does a reasonable job of using descriptive statements to express its annual performance goals for scientific research and education and of using primarily quantifiable performance goals for management and investment process activities. Also, the plan effectively links performance goals with the agency's mission and strategic goals.

For its scientific research and education activities, NSF established annual performance goals in the form of statements that describe "successful" and "minimally effective" performance, an alternative format allowed by the Results Act and the Office of Management and Budget (OMB). For example, NSF believes its performance will be rated successful in meeting its strategic goal of promoting connections between discoveries and their use in service to society if the results of NSF awards are rapidly and readily available and, as appropriate, feed into education, policy development, or work of other federal agencies or the private sector. But, NSF's performance will be rated only minimally effective if the results of its grant awards show only the potential for use in service to society. The descriptive statements developed by NSF reasonably define the type and level of annual performance that the agency expects for these activities.

NSF's use of the alternative format performance goals for outcomes in research and education allows for expert judgment, considering both quantitative and qualitative information on performance. There is strong consensus among science agencies that expert review is the most rigorous and effective tool for evaluating basic and applied research and that the practical outcomes of basic research cannot be captured by quantitative measures alone.

To evaluate the results under this alternative format, NSF will use expert peer review. NSF is relying on external experts who constitute Committees of Visitors who make qualitative judgments of many aspects of the agency's performance and who, starting in fiscal year 2000, will include the Results Act performance goals in this process. This is the first time that experts have been asked to pass judgment on the results of NSF's research investments. NSF has Guidelines for Committees of Visitors that describe the processes in place for collecting results information used to assess NSF's performance. The guidelines provide information on how phrases such as "important discoveries" and "steady stream of outputs of good scientific quality" are to be interpreted by reviewers and decisionmakers. They also identify procedures and processes in place to ensure reliable and accurate qualitative data for assessment. In essence, the experts provide the standards and must justify their assessment of NSF's performance with specific examples.

Decisionmakers within NSF, OMB, and the Congress who will use performance information may need to understand the basis for the reviewers' evaluations. It may therefore become necessary to share some of the written justifications supporting programs' ratings. NSF recognizes that the elements of the external expert's quality determination will vary in character from year to year and from program to program. This variance may lead to difficulties in evaluating results over time. Nonetheless, until the NSF guidelines for evaluating performance results are implemented, it will be difficult to assess whether they are providing enough guidance to aid reviewers.

The fiscal year 2000 performance plan corrects some of the weaknesses that we identified in our assessment of the fiscal year 1999 performance plan by providing a clear picture of intended performance across the agency and making some specific commitments to address those weaknesses. In reviewing the fiscal year 1999 plan, we observed that definitions of expected performance were not provided with the alternative format. In addition, performance was defined by using output-oriented rather than outcome-oriented goals for its management and other activities. The improvement shown in the fiscal year 2000 plan includes the addition of outcome-oriented goals to the management and investment activity sections, as well as details on crosscutting efforts with other federal agencies.

Other opportunities for strengthening NSF's performance plan include attention to intermediate goals and to the management challenges identified by the NSF Office of the Inspector General (OIG). (See enclosure II for a list of the management challenges.) Given the long-term nature of many of NSF's performance goals, multiyear goals may be useful for conveying what a program is expected to achieve for that year and in the long-term. In addition, performance goals or strategies to resolve mission-critical management problems, such as the development and implementation of an effective system for cost sharing, could enhance the plan.

The Agency's Performance Plan Provides a General Discussion of the Strategies and Resources the Agency Will Use to Achieve Its Goals

The plan provides a general discussion of strategies and resources the agency will use to achieve performance goals and includes information, for most of the goals, on external factors and crosscutting areas with other agencies. The plan discusses strategies for NSF's scientific research and education goals as well as some description of strategies the agency will use to achieve its goals for management and investment process activities. The plan discusses external factors and, in some instances, the actions to mitigate their impact on performance. However, the plan only partially discusses resources that NSF will use to achieve performance goals, primarily discussing how budgetary resources relate to the achievement of performance goals.

Connecting Resources to Strategies

The plan does not clearly show how budgetary resources relate to NSF's performance goals. After arraying the funding requested for NSF's research program activities, education and training, and administration and management, the plan presents a second analysis that shows which of the functional areas support one or more of the agency's five major scientific research and education goals. The plan provides financial information by discussing the funds that NSF requested in its fiscal year 2000 budget request to achieve scientific research and education goals. However, this second analysis does not indicate what level of funding is associated with each of these goals. Specifically, the plan does not show how program activities and related funding will be allocated to NSF's performance goals.

Documenting how the funding from NSF's activities will be allocated to its performance goals remains challenging for NSF. For example, NSF's research grants in support of graduate students produce outcomes for more than one performance goal. According to NSF, programs associated with these grants produce results for each of the four performance goals: (1) discoveries at and across the frontier of science; (2) connections between discoveries and their use in service to society; (3) diverse, globally oriented science and engineering workforce; and (4) improved math and science skills needed by all Americans. Therefore, associating the funds for one project to only one goal underestimates the funds in support of other goals. Because of this complexity, it may be helpful for NSF to document the various connections between program activities and performance goals and to consider some variations in its program activity structure. In our 1999 report issued on the subject of agency performance plans, we reported on other federal agencies' efforts to align their budgets with

their performance goals.¹ For example, the Department of Health and Human Services' Indian Health Service included an effective crosswalk that aligns its budget activities with its performance in aggregated program activities. The Environmental Protection Agency proposed changes to its program activity structure across all of its accounts in which each program activity represents one of the agency's strategic goals. Using this realigned program activity structure in its annual plan, the agency showed the funding it requested in order to achieve each strategic objective and the supporting annual performance goals.

Decisionmakers recognize that funding from one budget activity may support more than one performance goal and the Results Act gives agencies the flexibility to aggregate, disaggregate, or consolidate the budget's program activities so that they align with the performance goals. While the level of detail in the plan depends on the needs of congressional committees, better performance plans not only describe the resources needed but also provide a rationale for how the resources will contribute to accomplishing the expected level of performance.

NSF officials told us that the interdependence of programs and goals is the principal challenge they face in linking budget and performance goals. NSF pointed out that its investments generally work toward more than one of the performance goals simultaneously. NSF's discussions with OMB about modifying its budget lines to align with performance goals are ongoing. Nonetheless, we believe further effort is needed to meet the needs of congressional reviewers who will be evaluating budgetary resources based on achievement of performance goals.

Connecting Strategies to Results

NSF's performance plan presents clear and reasonable strategies that NSF will use to achieve its fiscal year 2000 performance goals. Specifically, the plan describes general strategies that NSF intends to use to achieve its five primary goals for scientific research and education and then discusses the strategies that the agency will use to achieve each of its performance goals, most of its performance goals for the NSF investment process, and each of its performance goals for management. For example, NSF will use a competitive merit-based review process with peer evaluations to identify the most promising ideas from the strongest researchers and educators and will integrate research and education activities to strengthen both activities. Overall, the strategies describe reasonable approaches for achieving NSF's fiscal year 2000 goals for scientific research and education. For its management and investment process activities, NSF established 19 performance goals. These include such elements as completing the processing of proposals electronically, constructing research

¹ Agency Performance Plans: Examples of Practices That Can Improve Usefulness to Decisionmakers (GAO/GGD/AIMD-99-69, Feb. 26, 1999).

facilities on a timely basis, addressing integration of research and education, and maintaining the participation of students and staff from underrepresented groups in science and engineering.

Information on means and strategies for achieving these goals, crosscutting activities with other agencies, external factors that could affect performance, and capital assets and mission-critical management systems is provided for some but not all of the management and investment process performance goals. Moreover, these elements are often incomplete. For example, in the performance area of facilities oversight, NSF's performance goals include keeping construction and upgrades within the annual expenditure plan by not exceeding 110 percent of estimates and keeping operating time lost due to unscheduled downtime to less than 10 percent of the total scheduled operating time. External factors such as extremely adverse weather or the failure of partners to act as planned are identified as issues that could have a significant effect on NSF's construction projects and operating plans. However, NSF did not describe strategies to mitigate the effects of external factors on the accomplishment of performance goals. The failure to complete construction of facilities could affect the volume and quality of research or affect NSF's costs for supporting research. The plan does not indicate the efforts that the agency will make to monitor the extent to which unforeseen circumstances could affect the agency's fiscal year 2000 performance.

NSF told us that to the extent that there are major changes that might have an impact on NSF performance, the agency would work to smooth the transition to a new "steady state," while optimizing performance under the circumstances. Furthermore, if the agency believes the work cannot be reliably completed, it may cancel the funding for an award, which may not improve performance but at least may mitigate the continued use of funds for unproductive activities.

Comparison to Fiscal Year 1999 Performance Plan

The fiscal year 2000 performance plan recognizes the weaknesses that we identified in our assessment of the fiscal year 1999 performance plan in terms of providing a complete discussion of the strategies and resources the agency will use to achieve performance goals and makes specific commitments or shows actual attempts to address those weaknesses. In reviewing the fiscal year 1999 plan, we observed that the plan did not provide a linkage between performance goals and the agency's budget; clearly describe the strategies the agency will use to achieve its goals for management and other activities; address external factors that are likely to affect its performance; or discuss resources that it will use to achieve performance goals. Among the improvements in the fiscal year 2000 plan is the inclusion of some information on the means and strategies for achieving goals, crosscutting activities with other agencies, external factors that could affect performance, and information resources addressing management and other activities. Although these elements are often incomplete, the additional detail demonstrates an improvement over last year's plan. For example, while

the plan provides some additional discussion of the means and strategies supporting NSF's investment in new and emerging technologies, such as electronic proposal processing, the plan lacks specific information on the capital, human, or information resources that will be needed.

The Agency's Performance Plan Provides Limited Confidence That Agency Performance Information Will Be Credible

The plan provides limited confidence that the agency's performance information will be credible. NSF's performance plan provides separate verification and validation plans for its research and education goals and its management and investment activity goals. These plans provide an overview of the information sources and the primary information systems that NSF plans to use to assess achievement of its fiscal year 2000 performance goals. The plan identifies four information systems that will store, process, analyze, and report performance measurement data, but does not describe any standards or procedures that it will use to assess the reliability of the systems. Moreover, significant limitations are not described, and details of assessment or correction plans are not provided, making it impossible to assess these data limitations.

NSF officials told us that they have procedures in place and are developing processes to assess the reliability and validity of data used to assess goal achievement in partnership with the OIG. For example, the OIG plans to selectively test systems presently in use and under development that produce data on the performance goals for their accuracy and reliability and to determine that they work correctly. The systems used for performance measurement having the greatest risk for inaccuracy will be tested for reliability of quantitative data supporting the performance measures. In addition, the adequacy of internal controls over automated data information systems will be reviewed by the OIG. It is too soon to know whether the data entering the information systems are valid and reliable because NSF did not present information regarding reliability and validity.

NSF officials told us that many of the specifics on data systems are provided in the agency's internal documents. Explaining that they did not want to overwhelm the performance plan with detail on how the information will be collected and assessed for its reliability, officials told us that the information is available in other sources. Nonetheless, the plan's lack of specificity does not provide any reasonable assurance that the performance information will be of sufficient reliability and validity to credibly assess NSF's fiscal year 2000 goal achievement. In summary, NSF's plan fails to describe specific and credible procedures to (1) verify and validate performance information and associated information systems required for assessment of fiscal year 2000 goal achievement; (2) determine the soundness of the review, analysis, and synthesis process used to assess performance; and (3) identify significant data

and/or information system limitations, their implications for assessment of performance goal achievement, or any actions designed to improve recognized problems.

The fiscal year 2000 performance plan does not appear to recognize the weaknesses that we identified in our assessment of the fiscal year 1999 performance plan in terms of providing sufficient confidence that the agency's performance information will be credible. In reviewing the fiscal year 1999 plan, we observed that NSF's performance plan fell short of identifying significant limitations with performance data and the potential implication of the limitations for assessing the achievement of performance goals. These concerns remain with the fiscal year 2000 performance plan.

Other Observations on the National Science Foundation's Implementation of Performance-Based Management

For some crosscutting activities, a coordinating entity oversees the contributions of participating agencies, independent of the Results Act's implementation. For example, the National Science and Technology Council establishes national goals for federal science and technology investments for the U.S. Global Change Research Program, among others. NSF is one of several agencies that support or conduct research and education activities in support of this program. One desirable result of this performance management is increased teamwork among agencies as well as improved communication between research agencies and oversight entities.

While NSF was effective in identifying programs that contribute to the same or similar results of many of its programs in its fiscal year 2000 performance plan, the plan's usefulness to congressional decisionmakers could be enhanced further. Identifying the results-oriented performance goals that involve other agencies and by setting intermediate goals that clarify the specific contribution the agency makes to the common results would make the plan more informative. However, because NSF addresses many small parts of several crosscutting programs, adding too much information could skew the level of detail in this area relative to the rest of the plan.

For significant crosscutting projects, such as the U.S. Global Change Research Program, the National Science and Technology Council developed an implementation plan that addresses the achievement of performance goals and objectives by several participating agencies. Plans such as these are specific to a particular goal and may be more useful to decisionmakers than brief discussions in multiple agency plans. To encourage such efforts, a coordinating agency could act as a focal point for other areas of significant crosscutting endeavors. Because it is common and valuable for multiple agencies to approach similar fields of research from different perspectives, better communication among agencies would enhance the opportunities for collaboration, help to keep important questions from being overlooked, and

reduce instances of inefficient duplication of effort. Information on support for a particular field of research could be provided to all agencies involved in it so that they can adjust their efforts to ensure that the field is appropriately covered.

Agency Comments

On April 21, 1999, we obtained comments from NSF officials, including the Deputy Director, on a draft of our analysis of the agency's fiscal year 2000 annual performance plan. These officials generally agreed with the observations made in the draft. They provided clarification on several points about the linkages between performance and resources and about issues concerning measurement and data verification and validation. We incorporated this information in the report as appropriate. NSF officials pointed out that the Foundation is one of the only agencies using the qualitative method to assess performance in research and education by using the alternative format. To test this approach, officials are using its Committees of Visitors process to assess performance for NSF's first performance report for March 2000. This point was incorporated in the body of the report.

Management Challenges

The following table identifies management challenges confronting the National Science Foundation, as identified by the NSF Office of Inspector General (OIG).

Table II.1: Management Challenges in NSF's Fiscal Year 2000 Performance Plan

Inspector General's areas of concern	Applicable goals and measures in the fiscal year 2000 annual performance plan
Managing an effective merit review system	<p>Among the annual performance goals for NSF's investment process, NSF has two goals related to merit review: (1) At least 90 percent of NSF funds will be allocated to projects reviewed by appropriate peers external to NSF and selected through a merit-based competitive process, maintaining the fiscal year 1998 baseline and fiscal year 1999 goal of 90 percent, and (2) NSF's performance in implementation of the new merit review criteria will be successful when reviewers address the elements of both generic review criteria appropriate to the proposal at hand and when program officers take the information provided into account in their decisions on awards; performance will be minimally effective when reviewers consistently use only a few of the suggested elements of the generic review criteria, although others might be applicable.</p> <p>In addition, according to NSF, the performance goal of funding a percentage of new investigators is directly responsive to the concern about the fair evaluation of proposals from "individuals or institutions that do not already receive NSF funding." As part of the performance evaluation of results, NSF will ask the directorate advisory committees to examine the fiscal year 2000 portfolio to characterize high-risk, multidisciplinary, or innovative projects. This addresses the OIG's concerns about proposals with novel ideas.</p>
Capitalizing on NSF strengths when responding to increased expectations	<p>None. The key issues here are (1) the use of competitive processes in merit review (addressed in the performance goals for use of merit review and use of merit review criteria) and (2) the emphasis on fundamental research in emerging areas of opportunity linked with societal interest (results-oriented goals for discoveries and connections).</p> <p>The OIG cited information technology and the environment as areas where increasing NSF's leadership role is a challenge. An example of NSF's response to the challenge is the new emphasis in biocomplexity. In the performance plan, NSF says that relevant advisory committees will be asked to address previous NSF efforts in the biocomplexity area. This is an example of special emphasis areas under the performance goals for discoveries and connections.</p>

Enclosure II
Management Challenges

Inspector General's areas of concern	Applicable goals and measures in the fiscal year 2000 annual performance plan
Using the Government Performance and Results Act	None. According to NSF, there are three important concepts that NSF has incorporated in its plan to implement the Results Act: (1) using the Results Act as a NSF management tool for improving performance (this is the underlying purpose for all of the NSF performance goals); (2) minimizing burdens on NSF staff and the external expert community (NSF has worked to do this by using standard data systems that are already part of NSF processes, linking external expert assessment of NSF performance to preexisting oversight functions, and developing an electronic project reporting system designed to capture the information needed for the assessment of results, and to replace previous hard-copy systems); (3) preserving the traditional roles of advisory committees in providing advice and guidance (NSF is in the process of testing an expert assessment process with advisory committees and will fold its concerns about the process into NSF's continuing planning).
Responding to the Chief Financial Officer's Act	None. According to NSF, the OIG's discussion focuses on one aspect of financial statements on which the auditors could not express an opinion. The auditors expressed an unqualified opinion on the fiscal year 1998 financial statements. There was not need to address this for fiscal year 2000 because systems that have been put in place are being maintained that address this issue identified by audits in earlier years. (Note: NSF was one of two agencies to receive an "A" rating by the Congress for its fiscal year 1998 annual financial report.)
Implementing FastLane: a new electronic proposal and award data information system	FastLane is an electronic processing system that has been in development for several years. According to NSF, FastLane will allow implementation of the final project reporting system, one of NSF's goals intended to generate improved outcome data. NSF pointed out that even when complete, it will continue to evolve to reflect new technologies. Among NSF's annual performance goals for management are three that relate to electronic proposal processing: (1) NSF will receive at least 35 percent of full proposal submissions electronically through FastLane, improving on the fiscal year 1998 baseline of 17 percent; (2) by the end of fiscal year 2000, NSF will have the technological capability of taking competitive proposals submitted electronically through the entire proposal and award/declination process without generating paper within NSF; and (3) by the end of fiscal year 2000, all relevant staff will receive preliminary training on use of electronic proposal/award jackets.

Enclosure II
Management Challenges

Inspector General's areas of concern	Applicable goals and measures in the fiscal year 2000 annual performance plan
Managing the Antarctic program	None, however, the Antarctic program challenge falls under the broad outcome goals of NSF's performance plan. The facilities goals are also relevant, with the key issue being support for facilities and logistics. Both are addressed as part of NSF's performance goals for facilities construction and operation under the investment goals.
Sustaining high scholarship and integrity	None. However, according to NSF, the agency has systems in place to deal with the integrity issues addressed and is responsive to the recommendations of the OIG as reflected in the semiannual reports by the OIG to the Congress. The OIG recommendation is that the agency remain vigilant, which is its intention.
Spending funds effectively and efficiently	This challenge relates to developing partnerships between NSF management and the OIG. As part of the partnering effort, an Audit Coordination Committee was implemented with the concurrence of the National Science Board in fiscal year 1998. The data verification sections indicate that this partnership is working with regard to performance measurement. Numerous indications of progress in this area are also mentioned in the OIG's semiannual reports.
Managing an effective system for cost-sharing	None. However, NSF is developing new policy in this area. The draft policy has been shared with the appropriate committee of the National Science Board and will be on the agenda for approval at the Board's May meeting. NSF may consider developing a performance goal related to the policy's implementation once it is finalized.
Managing salaries and administrative resources	None. NSF has proposed some budget changes that could ameliorate the issues raised by the OIG. NSF's plan addresses staff recruitment and diversity in an effort to be responsive to the OIG's comments. The performance plan does not address staff travel, program oversight, and workload, except insofar as it expresses the hope that electronic innovation will help the agency address this. The fiscal year 2000 budget request does include an increase in travel funds for fiscal year 2000 to continue to support the merit review process while increasing NSF's capacity to do oversight and outreach travel. According to NSF, this increase will help to ensure both a reliable merit review process and the oversight recommended by the OIG.

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