
THE GEORGE WASHINGTON UNIVERSITY

WASHINGTON, DC

Submitted Comments Regarding Federal Statistical Programs: 2016

Andrew Reamer, Ph.D., Research Professor

January 1 through March 31

	<u>Page</u>
<u>Census Bureau</u>	2
Annual Survey of Entrepreneurs	
<u>National Science Foundation</u>	3
Graduate Research Fellowship Program (GRFP) Pilot Data Collection for Monitoring Longitudinal Career Outcomes of Fellowship Recipients	
<u>Bureau of Industry and Security</u>	5
National Security and Critical Technology Assessments of the U.S. Industrial Base	

THE GEORGE WASHINGTON UNIVERSITY

WASHINGTON, DC

March 30, 2016

Mr. Paul Bugg
Statistical and Science Policy Office, Office of Management and Budget
Washington, DC

Via: Paul_Bugg@omb.eop.gov and OIRA_submission@omb.eop.gov

Re: 2015 Annual Survey of Entrepreneurs

Dear Mr. Bugg,

I am pleased to respond to the *Federal Register* notice of March 11, 2016 of the Census Bureau's information collection request regarding the 2015 Annual Survey of Entrepreneurs (ASE), OMB Control Number 0607-0986. As a research professor at the George Washington Institute of Public Policy, I focus on policies that promote U.S. economic competitiveness. From this perspective, I find that the 2015 ASE is important to the nation's competitiveness because it will facilitate in-depth understanding of the dynamics of entrepreneurship and emerging patterns of employee work arrangements.

I appreciate the opportunity to comment on the proposed 2015 ASE and look forward to your decision.

Sincerely,



Andrew Reamer
Research Professor

THE GEORGE WASHINGTON UNIVERSITY

WASHINGTON, DC

March 16, 2016

Suzanne H. Plimpton, Reports Clearance Officer
National Science Foundation
4201 Wilson Boulevard, Suite 1265
Arlington, Virginia 22230

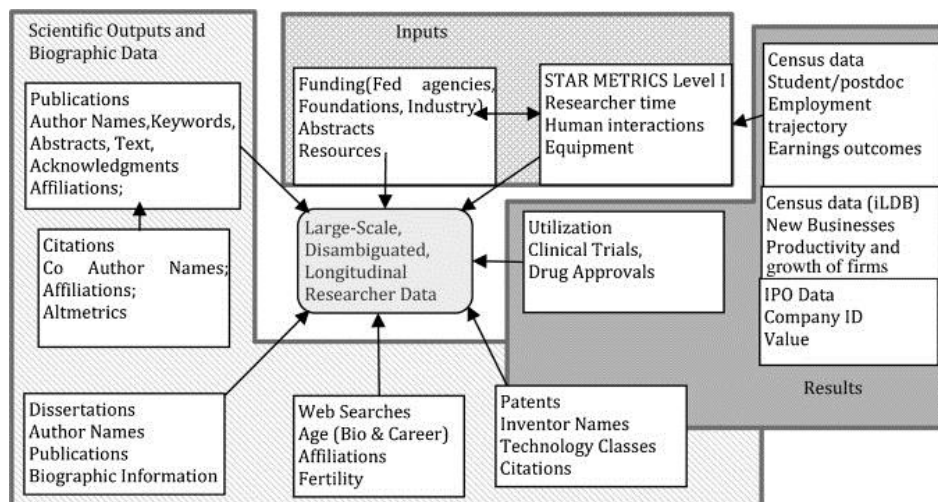
Via: splimpto@nsf.gov

Dear Ms. Plimpton,

I am pleased to provide comments on the planned information collection request (ICR) announced by the National Science Foundation (NSF) in the *Federal Register* on March 9, 2016 regarding a Graduate Research Fellowship Program (GRFP) Pilot Data Collection for Monitoring Longitudinal Career Outcomes of Fellowship Recipients.

As a research professor at the George Washington Institute of Public Policy, George Washington University, I focus on federal policies that promote competitiveness and innovation. From that perspective, I support the proposed GRFP pilot as it will enable the development of a permanent GRFP outcomes tracking system that will facilitate understanding of and improvements in the GRFP.

To reduce increase data quality and reduce respondent burden, I strongly encourage NSF to explore the possibility of revising the proposed information collection methodology to include utilizing administrative data on Graduate Research Fellow employment outcomes, research projects, funding, and publications available through the [Institute for Research on Innovation and Science](#) (IRIS), a new multi-university data cooperative based at the University of Michigan. The following schematic (available [here](#)) shows the various data elements collected by IRIS.



NSF may explore the potential for utilizing IRIS in creating a data monitoring system for GRFP by contacting Prof. Jason Owen-Smith, IRIS Executive Director at (734) 936-0463 or idos@umich.edu.

I appreciate the opportunity to comment on the planned GRFP data pilot ICR and hope you find this suggestion useful.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Reamer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Andrew Reamer
Research Professor

THE GEORGE WASHINGTON UNIVERSITY

WASHINGTON, DC

March 30, 2016

Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, DC

Via: OIRA_submission@omb.eop.gov

cc: Paul_Bugg@omb.eop.gov

Re: National Security and Critical Technology Assessments of the U.S. Industrial Base (OMB Control Number 0694-0119)

Dear OIRA desk officer for BIS,

I am pleased to respond to the *Federal Register* notice of March 29, 2016 of the Bureau of Industry and Security's information collection request (ICR) regarding National Security and Critical Technology Assessments of the U.S. Industrial Base. As a research professor at the George Washington Institute of Public Policy, I focus on policies that promote U.S. economic competitiveness. From this perspective, I find that the BIS's industrial surveys are worthy of OMB approval because they facilitate understanding regarding the current and possible strengths and weaknesses of defense-related industries key to nation's security and economy.

I also request that OMB include the following conditions in its clearance of BIS's ICR.

- Direct BIS to provide persons interested in responding to the 60-day notice with information sufficient to allow them to provide meaningful comments.
 - As directed by the 60-day notice of January 25, 2016, I requested on February 7, 2016 that BIS send me information pertinent to the planned ICR. On March 18, 2016, just a few days before the end of the comment period, I received an email from Mr. Mark Crace without information that would allow me to make an informed response. I am attaching my request and Mr. Crace's response. You may note that Section A.8 of the supporting statement does not mention that I responded to the *Federal Register* notice.
- Instruct BIS that in future ICRs it should include sample surveys and provide a link to recent assessments.
 - In this ICR, BIS does not provide stand-alone examples of past survey instruments for commenters to examine. One has to delve into past reports to find a survey instrument.
 - Section A.1 of the ICR supporting statement lists a number recent BIS assessments. However, OMB and commenters are not told how they might access these reports. Through a web search, I found them at <https://www.bis.doc.gov/index.php/other-areas/office-of-technology-evaluation-ote/industrial-base-assessments>.

- At the same time, BIS appended to the ICR two sample assessments that were carried out in 2012.
- In any case, no recent report includes the survey instrument, so the examples I was able to see were from four years ago.
- Ask BIS to describe how it partners with the Census Bureau.
 - While Section A.4 of the supporting statement indicates that the Bureau partners with the Census Bureau, it does not describe the nature of that partnership. As a result, the public cannot provide comments on that aspect of the BIS effort.
- Ask BIS to indicate how it will work with the Census Bureau and the National Center for Science and Engineering Statistics (NCSES) to reduce response burden of the 28,000 firms it surveys each year.
 - The Census Bureau and NCSES survey firms also surveyed by BIS and ask several of the same questions, particularly with regard to overall employment and revenues.
 - Consequently, BIS might obtain a baseline of information on respondent firms from existing Census and NCSES records and so reduce response burden.
- Direct BIS to describe how it will provide its survey responses to the Census Bureau's Center for Economic Studies (CES) for inclusion in various CES longitudinal databases.
 - CES actively incorporates external datasets into its longitudinal databases, which are used for sophisticated economic analyses. BIS survey responses would be valuable additions to the CES efforts.

I appreciate the opportunity to comment on the proposed ICR regarding National Security and Critical Technology Assessments of the U.S. Industrial Base, hope that my comments are useful, and look forward to reading your decision.

Sincerely,



Andrew Reamer
Research Professor



Reamer, Andrew <areamer@email.gwu.edu>

RE: BIS Natl Security and Critical Tech Assessments of U.S. Industrial Base

1 message

Mark Crace <Mark.Crace@bis.doc.gov>
To: "areamer@gwu.edu" <areamer@gwu.edu>

Fri, Mar 18, 2016 at 2:16 PM

Professor Reamer,

The collection number 0119 you are requesting is an umbrella collection with many collections contained inside. It does not contain a collection instrument but is merely a justification for a number of specific collections for a limited time period, therefore, an instrument for this collection does not exist.

If you have any further questions please let me know.

v/r,

Mark Crace
U.S. Department of Commerce
Bureau of Industry and Security
Collections Manager

-----Original Message-----

From: Andrew Reamer [mailto:areamer@gwu.edu]
Sent: Sunday, February 07, 2016 3:26 PM
To: Mark Crace
Subject: BIS Natl Security and Critical Tech Assessments of U.S. Industrial Base

Dear Mr. Crace,

As directed by this Federal Register notice of January 25, 2016
<<https://www.federalregister.gov/articles/2016/01/25/2016-01338/proposed-information-collection-comment-request-national-security-and-critical-technology>> ,
I am writing to request from you copies of the draft information collection instruments prepared by the Bureau of Industry and Security for studies to assess the capacity of the U.S. industrial base to support the national defense. I see the previous submission to OMB in 2013 <<http://www.reginfo.gov/>

[public/do/PRAViewICR?ref_nbr=201212-0694-001](https://public.do/PRAViewICR?ref_nbr=201212-0694-001)> and look forward to seeing the draft of the forthcoming submission. Thank you for your attention to my request.

Sincerely,

Andrew Reamer
Research Professor
George Washington Institute of Public Policy
George Washington University

805 21 St., NW, Room 613
Washington, DC 20052

areamer@gwu.edu
(202) 994-7866