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December 20, 2016

Wade Wargo
ASD (R&E) Basic Research Office
Department of Defense
Office of the Secretary
4800 Mark Center Drive, Suite 17C08
Alexandria, VA 22350

Subject: Solicitation Deadlines

Dear Mr. Wargo,

I appreciated our conversation on November 17th and wish to thank you for listening to our concerns regarding the 11:59 p.m. solicitation deadlines imposed by DoD. I'm writing to ask that the DOD, as a universal practice, consider revising all solicitation due times to 5:00 p.m. local submitter's time. We believe adoption of this alternative approach would not only benefit our member institutions by avoiding significant hardships reported by our members, but would also result in better proposals being submitted to DOD. In addition, it would provide greater consistency and continuity in submission deadlines as the vast majority of federal agencies adhere to the 5:00 p.m. deadline.

We acknowledge that a midnight deadline maybe more desirable to a PI who is wanting the extra time to put the proposal in final form. However, this only makes worse the problems caused by proposals that arrive for final institutional review minutes or even hours before the sponsor deadline when that proposal is arriving for review outside of normal working hours. There is extraordinary pressure put on institutional reviewers/approvers as they complete the final review of a proposal, which must be submitted by an institutional official, not the researcher.

Assuring that the proposal meets all sponsor and institutional requirements and the quality of the proposal reflects the institutions standards requires careful review and analysis and sometimes skillful communication with the principal investigator. Despite the temporary injunction on DOL's Overtime rule that was to go into effect December 1, many institutions have re-categorized positions from exempt to non-exempt having to pay overtime for proposal staff to work hours beyond 5:00 p.m. Proposal staff may require the resources of the sponsor's help desk not available after 5:00 p.m. Establishing a midnight deadline adds additional pressures to those reviews that don't exist after the normal working day. The lack of sponsor resources to ask questions, the lack of other institutional resources that are not available after 5:00 PM, and the added frustrations of working at the end of a long day all adds stress and pressure that can result in a lower quality proposal being submitted ultimately impacting good science from moving forward.

As indicated in our conversation, some other major federal agencies, including NIH and NSF, have instituted proposal deadline submissions on or before 5:00 p.m. local submitter's time. This has the advantage to the agency of spreading out the load on agency servers,

since proposers will submit based on their time zone, as well as allows institutions to more actively enforce rational internal deadlines for submission to SPA offices for review purposes (such as “X hours before the agency’s due date/time”). Using a 5:00 p.m. local time deadline can be expected to result in a beneficial impact to DOD program officials as well, since increasing the amount of time used for institutional sponsored projects review and error correction should result in higher quality submissions. This also creates a level playing field for all investigators, since the deadlines are not time-zone dependent.

As an example, I’ve listed two (2) CDMRP solicitations that impose 11:59 p.m. deadline dates and one that has imposed a 5:00 p.m. deadline date.

http://cdmrp.army.mil/funding/pa/16prmrpcta_pa.pdf

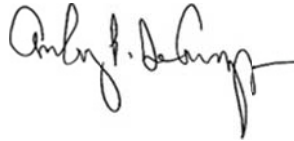
http://cdmrp.army.mil/funding/pa/16bcrcpbreakthrough_fl34_2_pa.pdf

http://cdmrp.army.mil/funding/pa/17dmdrdptransfer_pa.pdf (5:00 p.m. deadline)

For these reasons, we ask that proposal deadlines be set uniformly at 5:00 PM local time.

Again, thank you for your consideration. Please feel free to contact me at (202) 289-6655 should you require additional information.

Sincerely,



Anthony P. DeCrappeo
President

xc: Gilbert Tran, Office of Federal Financial Management