



Ecological Society of America
1990 M Street, NW
Suite 700
Washington, DC 20036

August 24, 2011

Dr. Joann Roskoski
Assistant Director (Acting)
Director of Biological Sciences
National Science Foundation
4201 Wilson Blvd
Arlington, VA 22230

Dear Dr. Roskoski:

On behalf of the Ecological Society of America (ESA), representing 10,000 professional ecologists, I write to respectfully request that you reconsider the National Science Foundation (NSF) Directorate for Biological Science's recent procedural changes for submission and review of its BIO division research proposals.

The Society is concerned that these changes, which limit the frequency of proposal submissions to core programs within the NSF Divisions of Environmental Biology (DEB), Integrative Organismal Systems (IOS), and Molecular and Cellular Biosciences (MCB), appear to have been developed without input from the broader scientific community of investigators that rely on NSF funding. We believe this will likely have a negative impact on the research missions of scientists and various institutions across the nation.

Under the new rules, the frequency of proposal submissions for DEB and IOS would be reduced to once per year, requiring a preproposal screening of all submissions for these divisions and limiting individual participation in multiple grants to only two submissions per year. The rules for MCB intend to reduce the frequency of submissions from every six months to every eight months and limit the number of proposals submitted by individual investigators to only one proposal as a PI or co-PI per eight-month cycle.

ESA acknowledges that the current system is in need of reform due to the demands it places on PIs, panels, and proposal reviewers. While we recognize that an increase in proposal submissions has been coupled with a marked decline in funding in recent years, limiting proposal submissions and restricting the ability of individuals to collaborate as co-PIs or subaward PIs on multiple proposals is not the answer. The new submission criteria will disproportionately burden two groups in particular: scientists who depend on external funding for salary and staff, especially early career researchers, and assistant professors for whom obtaining a grant is a critical component of tenure but have a limited time span in which to be successful.

Given our nation's current employment situation, another encumbrance on the ability of young professional scientists to secure funding and consequently long-term employment could have negative economic consequences. As a result, this proposal could have the unintended consequence of directly countering the administration's ongoing efforts to spur job creation and further the economic recovery through critical investments in science and innovation.

The Society is troubled by the fact that this decision seems to have been initiated internally by the BIO Directorate without external consultation from scientists and stakeholders, despite the fact that NSF has collaborated constructively with scientists in the development of new agency initiatives in the past. As the agency undertakes such efforts, we ask that you continue an open dialogue and outreach to the research community.

ESA appreciates that NSF streamlining its workload is an earnest effort to maintain its invaluable service and proficiency as a scientific resource. We welcome and urge your continued consultation with the research community in this effort as well as in any other decisions from NSF that directly impact the work of scientists.

Very truly yours,

A handwritten signature in black ink, appearing to read "Steward T. A. Pickett". The signature is fluid and cursive, with a prominent initial "S" and a stylized "P".

Steward T. A. Pickett
President