



MEMORANDUM

TO: Thomas Peterson, Assistant Director, ENG
FROM: Steven McKnight, Director, CMMI
DATE: November 1, 2011
SUBJECT: Implementation of the Report of the Committee of Visitors for the CMMI Division
 UPDATED for 2011

Implementation of CMMI COV Recommendations

Recommendation from 2009 COV	CMMI 2009 Response to COV	CMMI 2010 Update	CMMI 2011 Update
<p><i>The COV recommends that program officers prompt panelists to give more substantive comments.</i></p>	<p>CMMI will continue to encourage program officers to instruct panelists clearly to provide detailed comments and feedback, and will ensure that this message is conveyed consistently to panelists in the opening presentation. Panelists will be provided with clear examples of comments that reflect the desired level of information.</p>	<p>CMMI continues to develop best practice documents to provide new program directors with necessary information for panel briefings. Upon a 2009-2010 DD review of CMMI processes, a CMMI “Tiger Team” was formed in 2010 to address systemic operational issues. Best practices for panel management are one of several issues being tackled.</p>	<p>CMMI implemented the findings of the Tiger Team and created training documents and checklists for PDs and other staff. The division held training sessions to refresh all staff on a variety of issues including appropriate panel summary content. The division has also increased its formal mentoring of new PDs and encouraged them to participate in NSF-wide merit review training.</p>
<p><i>The panel summary often does not provide insight on [the differences of opinion among reviewers].</i></p>	<p>CMMI will develop and distribute a set of best practices containing illustrative examples designed to elicit more comprehensive and detailed summaries. The division will also develop a standard template for</p>	<p>The CMMI Tiger Team that comprises both program and support staff to evaluate current divisional practices and to gather/develop documentation as well as standard templates for use across the division.</p>	<p>See above.</p>

	<p>panel summaries that will be provided to each panelist during the meeting with specific guidelines and questions that should be addressed that will help illustrate the panel's rationale for decision.</p>	<p>This team has reviewed available best practices and is drafting new documents as well as training practices to ensure adoption of these processes.</p>
<p><i>A better job could be done in providing the PI's with meaningful feedback on technical weaknesses and the addressing of the lack of discussion of broader impacts of the proposal.</i></p>	<p>See response 2. Additionally, CMMI is developing templates and best practices for program director documentation of decisions that will ensure that sufficient information is provided in review analyses for declines and awards.</p>	<p>See above. See above.</p>
<p><i>The COV realizes that recruiting industrial reviewers for proposals is difficult. However, the COV reviewed a number of proposals that had a significant industry component, where industry was a partner or where the work being proposed might have a significant industry impact, and yet there were no industry representatives on the panel.</i></p>	<p>We continually seek a broad and diverse set of panel members including representatives from industry, national laboratories, and other government agencies. Our experience has been that potential reviewers from industry are sometimes reluctant to participate (or are prohibited from serving on review panels) to protect them and their firms against claims made with respect to intellectual property. They also face greater constraints on their available time and some believe that they gain little personally from serving on a panel. Finally, because of collaborations between their companies and PIs in their area of expertise, there can be an excessive number of conflicts with proposals being reviewed by a panel. These challenges can hinder our outreach efforts to attract industry panel</p>	<p>In FY 2010, CMMI used 640 reviewers from universities, industry, national laboratories, other agencies, professional societies and other non-university sources. The division seeks reviewers whenever possible from private industry or other sources. NSF has acquired new electronic tools that utilize web searches to aid in the identification of new reviewers beyond the traditional NSF audience. These resources, housed within the NSF library, have improved our ability to identify potential reviewers from industry and elsewhere. CMMI was trained on the use of these resources during a June 2010 retreat.</p> <p>In FY 2011, CMMI used 565 reviewers from universities, industry, national laboratories, other Federal agencies, and other sources. The division continues to seek reviewers whenever possible from private industry or other sources whenever possible. Additionally, the division will be utilizing the PRIM reviewer management tool developed in the Industrial Innovation and Partnerships division in ENG, and hopes to broaden its reviewer base through effective utilization of this tool.</p>

	<p>participants. CMMI will continue to seek reviewers from private industry whenever possible.</p>		
<p><i>Two cases [of] the appearance of a COI were noted. One involved a faculty member from the same institution reviewing a proposal and one had two panelists from the same department. There was inadequate documentation in both cases.</i></p>	<p>These cases have been investigated. In one case, the PI and the reviewer were from different campuses of the same university system (University of Connecticut at Storrs and University of Connecticut at Farmington) and hence did not have a conflict. The other instance involving two panelists from the same department may be undesirable, but does not represent a conflict. CMMI generally discourages the use of multiple reviewers from the same institution and department, but it occurs rarely and may be necessary to obtain the desired expertise. CMMI will continue to stress our policy regarding selection of reviewers, and ensure that conflicts and appearance of conflicts are managed appropriately.</p>	<p>No action. Issue investigated and completed in FY2009.</p>	<p>No action. Issue investigated and completed in FY2009.</p>
<p><i>The NSF gathers extensive demographic data (Science and Engineering Indicators; www.nsf.gov/statistics/seind08). The COV recommends that this data be used to evaluate balance.</i></p>	<p>This is a perennial issue across NSF that is complicated by a number of factors. Submission of demographics data by applicants and reviewers cannot be required and is provided on a voluntary basis by individuals. For a variety of reasons, many PIs do not declare their data, and the absence of data distorts the database. Thus, there are questions concerning the validity and accuracy of any assessments derived from this database relative to the questions asked of the COV. Getting better and more complete</p>	<p>CMMI actively looks to collaborate within ENG and Foundation-wide to obtain data of high quality to help evaluate its activities. As new technologies and data become available (as a result of new analysis technologies, policies or reporting requirements), the division will continue to strive towards providing complete data for both internal and external evaluation of its research portfolio. The AD for ENG established a working group on Assessment and Evaluation in 2009 which has recommended several</p>	<p>CMMI continues to collaborate within ENG and Foundation-wide to obtain data of high quality to help evaluate its activities. The division plans to collaborate with the new Staff Associate for Evaluation in the ENG Assistant Director's office as well as other efforts within the Foundation and government wide. The division is investigating ways to report on the outcomes of its activities and compare them to various indicators. It is hoped that the next COV will have available a self-</p>

	<p>data is a policy issue that has to be resolved at the Foundation (or governmental) level. Program directors do refer to such information (when available) when making funding decisions and by CMMI as a whole when planning for future support. While CMMI provided some data (for example, distribution of proposals/awards received by academic disciplines) for the COV to consider in evaluating the division, CMMI will ensure such data is provided in a clearer fashion and with supporting baseline information on the available pool of researchers for comparison for the next COV.</p>	<p>ways to better evaluate program balance. Tools are becoming available and the IIP Division is currently piloting some of these tools for the SBIR and I/UCRC programs. CMMI intends to utilize such tools when they become available beyond IIP.</p>	<p>study by the division that will provide a quantitative and qualitative analysis for their review.</p>
<p><i>The COV has a concern that some interdisciplinary proposals were not reviewed by interdisciplinary panels. If not addressed, with the anticipated increase of cross-disciplinary proposals, this could become an issue.</i></p>	<p>ENG now has a directorate-wide initiative and CMMI has a program called Interdisciplinary and Cross-Directorate Activities. It is the purpose of this program to assure that interdisciplinary proposals are appropriately reviewed. This program is still in its infancy and will develop over the next few years. CMMI will closely monitor the activities of this program and evolve it towards accomplishing its intended purpose.</p>	<p>In FY 2010, the Interdisciplinary Research Program made 12 awards totaling \$4.9 million in support. 77 Proposals were reviewed in 3 separate IDR panels. CMMI will monitor the progress of these awards and is evaluating the experiences of the IDR program to determine how best to foster interdisciplinary research in the future.</p>	<p>In FY 2011, the Interdisciplinary Research Program made 7 standard awards and 7 EAGER awards totaling \$2.5 million in Support. Additionally the program cofounded 3 awards to bring the total amount funded in ENG for IDR awards to \$4.05 million. CMMI continues to work with its community and other groups within NSF to ensure that interdisciplinary research is encouraged and funded.</p>
<p><i>...further attention to grant sizes is probably required in light of the continuously increasing costs of conducting research. Reductions in requested funding levels should be justified on the basis of project scope rather than availability of</i></p>	<p>We acknowledge that grant size is an issue, and the CMMI grant size has increased somewhat over the years, albeit perhaps not as much as PIs desire. Ideally, CMMI desires to fund awards at requested levels and minimize, where appropriate, the amount of budget reductions initiated by the program director. With fixed budgets, there is a trade-</p>	<p>As was reported below for FY2009, CMMI conducted a similar study of awards to determine if budget reduction was a wide-spread occurrence. The division found, as in the previous study, that 85% of awards in made in FY2010 were not reduced by more than 10% from their requested amount upon award. Moreover, 98% were awarded with no</p>	<p>A similar analysis was also conducted for FY2011 awards. The division found while budgets were reduced in more cases in this flat funding year, 74% of the full research awards made in FY2011 were not reduced by more than 10% of their requested amount upon award. Moreover, 82% of awards were made with no</p>

<p>funds.</p>	<p>off between award size and proposal success rate. CMMI is reviewing jackets to determine the magnitude of the issue. At that point, we will be better prepared to propose potential remedies, and engage other Divisions and the Directorate as appropriate to ensure consistency in any proposed strategy. (See response to below for preliminary findings).</p>	<p>more than a 20% budget reduction.</p>	<p>more than a 20% budget reduction.</p>
<p><i>...the participation of African Americans and Hispanics specifically is low and if it is much less than the pool of available participants should be improved.</i></p>	<p>Agreed. The participation of underrepresented minorities is a continuing issue. CMMI will continue to emphasize outreach activities that promote broader participation. For example, the annual CAREER proposal writing workshop, sponsored by CMMI, is widely supported throughout the Division. This workshop gives priority to women and minorities seeking to attend. Our hope is that improving the competitiveness of proposals submitted will increase the level of participation by women and minorities. The Division will also continue to make supporting such activities designed to encourage broadened participation (e.g. BRIGE, GRS, etc.) as part of its outreach and diversity efforts a priority.</p> <p>Along with these efforts, CMMI will continue to assess its portfolio of awards to ensure that balance of race and gender reflects the pool of applicants. The division will assess different ways to obtain this</p>	<p>CMMI sponsored several CAREER writing workshops this fiscal year, including one in September 2010 in Lincoln, Nebraska. As always, special emphasis was placed on ensuring participation of members of underrepresented groups within the workshop.</p> <p>Additionally, the division managed the ENG-wide Broadening Participation Research Initiation Grants in Engineering (BRIGE) competition and made 11 awards. Additionally, the division made 10 supplemental awards for graduate student involvement in research through the Graduate Research Supplement program that benefited 8 female, 2 African Americans, and 3 Hispanic students.</p> <p>Overall, the division continues to monitor and evaluate its portfolio of researchers to enable both high quality research and participation of underrepresented groups.</p>	<p>Again, CMMI sponsored several CAREER writing workshops and seminars this fiscal year, including on in Hartford, Connecticut in March 2011 and at the 2011 CMMI Grantees Conference in Atlanta, Georgia. Special emphasis again was placed on ensuring the participation of members of underrepresented groups at these workshops.</p> <p>At the time of writing, the division made 292 full research awards in FY 2011. Of these awards, 6 were given to Black/African American researchers and 1 to a Native American researcher. Additionally, 13 awards were made to Hispanic researchers. (Note: this information is based on self-reported data provided to NSF voluntarily by its researchers).</p> <p>CMMI strives to ensure a diverse awardee pool and supports the next generation of researchers through funding and managing the ENG-wide Broadening</p>

information in accordance with pertinent Federal statutes and regulations from its individual PIs. The division will conduct an analysis to compare this demographic data with data concerning broader community demographics to ensure that such underrepresented groups are neither under nor over represented in the funding portfolio.

Participation Research Initiation Grants in Engineering (BRIGE) program. CMMI made 11 BRIGE awards this fiscal year. Additionally, the division made supplemental awards to broaden participation in research via the Graduate Diversity Research Supplement (GDRS) program. This program allowed 23 students to participate in NSF-funded research projects that otherwise may not have been able to do so. Of these students, 11 were female, 6 were Hispanic, and 6 were African American.

Overall, the division continues to monitor and evaluate its research portfolio to enable both high quality research and participation of underrepresented group members.

The CMS COV of 2004 recommended “To meet the challenge of increasing numbers of proposals, the COV recommends that additional staff be assigned to CMS at both the PD and support staff levels.” Since then new staff have been hired, but insufficient to compensate adequately for attrition. Program Directors continue to appear to be overextended. This remains a concern.

Staffing levels have been a continuing issue within the Division. Formal staffing levels are established external of the Division, and CMMI cannot directly control its staffing allocations. The Division is actively recruiting to fill open vacancies and is making substantial progress.

While staffing levels are not established directly by the division, the division, despite nearly a 30 % turnover in program staff (including several unanticipated early departures), 3 new program assistants, and a record number of proposals, CMMI was able to process 80% of all proposals within six months of receipt, in accordance with GPRA guidelines.

During this fiscal year, staffing decisions were made in a timely fashion, and the division is now fully staffed from a support staff standpoint. Additionally, the division

In FY 2011, the division processed 3,383 proposals, and made 80% of its final decisions within six months of receipt in accordance with GPRA guidelines.

Despite meeting these goals, CMMI is continuing to optimize its processes for continuous improvement of operations and effective use of staff. For example, the division is investigating the use of real-time data to track proposals through the administrative review process to prioritize proposal handling and to

		<p>has explored the use of temporary experts and intermittent appointment of rotators to help lessen the burden on staff during times of staff transition, turnover, and high work volume.</p>	<p>ensure a balanced workload among the staff.</p>
<p><i>The DMI COV of 2006 observed “Both the directorate and the DMI division should examine their strategic plans for consistency with the GPRA goals and make changes to align these strategic plans with the desired outcomes.” We understand that a plan has been submitted and approved, but we have not seen evidence that the plan is referred to in the normal business practice.</i></p>	<p>CMMI has developed a divisional plan which aligns with the NSF strategic plan and ENG goals. This plan has been revised and refined over the past two years, and a new round of planning has been initiated within ENG that will further refine and articulate our overall vision. CMMI’s division plan will be updated and rewritten as part of this ENG-wide planning process.</p>	<p>In 2010, the Foundation developed a new NSF Strategic Plan, which is still undergoing review and approval. Likewise, ENG has embarked on a strategic thinking exercise that will influence the CMMI plan. This planning is still underway and the division is working to align its long-term vision with the Directorate and NSF as a whole.</p>	<p>Over the past year, each program conducted a strategic review of its portfolio and unique position in the directorate. Each program presented information on the research it supports, identified complementary programs in CMMI and in other parts of ENG and NSF as a whole, and identified future directions/emphasis areas important to their research communities. This information was connected to NSF initiatives and emphasis areas as well. From this analysis, each program director refined or changed their program description so that it reflected the current state of research in their fields. From this analysis, CMMI is working to ensure its overall division plan reflects the individual programmatic foci as well as NSF’s priorities. It is planned that a new division plan would be presented to the next COV for comment and review.</p>
<p><i>Broader impact</i></p> <ul style="list-style-type: none"> <i>• There is still no common understanding by the reviewers of how to judge the quality of</i> 	<p>Agreed. Since Broader Impact has been introduced as a review criterion, there has been confusion as to what qualifies as broader impact and how reviewers are to rate proposals regarding their</p>	<p>CMMI continues to provide this guidance on broader impacts to its panelists and to prospective reviewers through outreach at NSF Days, university visits, and as part of the CAREER proposal-writing</p>	<p>Over the past year, the National Science Board (NSB) has been conducting a review of the National Science Foundation’s merit review criteria (Intellectual Merit and Broader Impacts). At the</p>

<p>potential broader impacts.</p> <ul style="list-style-type: none"> The degree to which broader impact is achieved should be assessed at least qualitatively. 	<p>broader impacts. We believe that this is an issue that spans the entire Foundation and CMMI will work to better communicate the proper interpretation of the Broader Impacts criterion.</p> <p>As one way to do this, CMMI will provide guidance from NSF on examples of appropriate Broader Impacts to both its program directors (as part of their orientation to NSF) and to panelists (before the panel meetings) to attempt to alleviate this lack of common understanding. This document can be found here: http://www.nsf.gov/pubs/gpg/broaderimpacts.pdf.</p>	<p>workshop.</p>	<p>Board's May 2011 meeting, the NSB Task Force on Merit Review proposed a revision of the two merit review criteria, clarifying their intent and how they are to be used in the review process. In addition, the Task Force identified a set of important underlying principles upon which the merit review criteria should be based.</p> <p>CMMI is monitoring the activities of this task force and will ensure its findings on what broader impacts in research are and how they should be assessed in the context of the merit review process are communicated to its research and reviewer communities.</p>
<p>The previous COV commented on there not being documentation in the jackets to assess the qualification of the reviewers. This issue might be resolved easily, through, for example, self-assessments by reviewers.</p>	<p>Reviewers' qualifications are established by the program directors that use their knowledge of their respective communities to determine appropriate panelists. While self-assessment by reviewers may be one method to document these qualifications, there are specific reasons one would exclude this option. For example, providing this information in the jackets would open the review process to argument and challenge by the PIs, and may also divulge the identity of anonymous reviewers. This is a matter that would require a significant policy change, and it is at a level that must be considered NSF-wide. However, CMMI will conduct an analysis to determine</p>	<p>This is an ongoing concern and CMMI will continue to investigate how to collect and place the qualifications of reviewers within each review jacket.</p>	<p>CMMI plans also to utilize software tools recently developed in-house at NSF to provide a greater breadth and depth of data relevant to reviewers' professional experience and fields of expertise. For the next COV, CMMI plans on having the capacity to provide, upon request, visualizations of reviewers' collaborative networks, based on their co-authorship of proposals, publications, and patents along with history as an NSF reviewer to the COV.</p>

	<p>how, consistent with existing NSF policies, the qualifications of reviewers (e.g. C.V.) could be collected and added to each jacket's record.</p>
<p><i>The DMI COV of 2006 observed that the award size and duration were not appropriate. The COV has found no evidence of an analysis of the process for determining the appropriate size of awards.</i></p>	<p>This is correct. CMMI is in the process of conducting an analysis of reduction in award size for FY 2009. A key preliminary finding is that for about 90 percent of awards, there was no more than a 20 percent reduction from the amount requested by the PIs. CMMI relies on the expertise of its program directors to determine appropriate award size based research requirements and scope. However, the Division Director reviews each award before it is made to ensure that it is appropriate in the context of the CMMI portfolio. CMMI is exploring ways to define the real cost of doing research across the CMMI community.</p> <p>See earlier response with FY 2010 analysis. Results showed limited reduction in award size across the division.</p> <p>See earlier response with FY 2010 & FY2011 analyses. Results showed limited reduction in award size across the division despite budget constraints.</p>
<p><i>The COV recommends that the division regularly consider whether the current programs adequately support the mission of the division and how the programs and focus areas can evolve to address important national and societal issues (e.g., health care reform, energy sustainability, next generation transportation, infrastructure). The COV believes this activity would help the division align with and advance developing national priorities as well as</i></p>	<p>This is a valid concern. The division was reorganized in 2008 to reflect such concerns; however, it is still very much structured as it was as two separate divisions. There are, most likely, opportunities to improve upon the current structure at the program and cluster levels and these are being considered in current planning activities.</p> <p>CMMI is conducting internal planning activities in accordance with the revision of the ENG-wide strategic plan and NSF and government-wide priorities. The scope and organization of programs and clusters will be considered as part of this process.</p> <p>In the past year, the division has conducted strategic reviews of each of its programs. For example, as part of this evaluation of how programs can better serve the research community in light of important national/societal issues, the Nano and Bio Mechanics program (now known as the Biomechanics and Mechanobiology program) was realigned to reflect emerging research in the areas of cellular biomechanics and mechanobiology. Other programs modified program descriptions as</p>

<p><i>better articulate the importance of the division's research investments to the Foundation.</i></p>		<p>well to reflect current research challenges and to define unique positions in the research enterprise. It is hoped that this will not only advance research, but direct prospective PIs towards the appropriate program for submission.</p>
<p><i>In light of the division's expanded mission, the COV recommends that an assessment of the CMMI Grantee's Conference be undertaken to identify clearly the benefits achieved by the meeting and to examine alternate formats to better achieve its goals. The division should ensure that program directors and PIs have adequate resources to interact with their PIs and to stay engaged in their disciplinary areas.</i></p>	<p>CMMI has recruited an AAAS fellow, Dr. J. Phillip King on sabbatical from New Mexico State University's Department of Civil Engineering, to carry out various evaluation functions, including an assessment of the Grantees' Conference. His preliminary finding is that the Grantees' Conference is an effective way to address CMMI's stewardship objectives. We are aware of no other approach that can achieve the economy of scale that the conference provides for constructive interaction among Program Directors, PIs, and students. CMMI is exploring other avenues for interaction among PIs and other stakeholders.</p>	<p>Dr. King's evaluation of the grantees conference found the event positive in terms of its value. His report also identified areas that would increase the value of the meeting to CMMI and the grantees. The division will continue however to assess its value and investigate various ways to enhance interaction between PIs and other stakeholders. For example, we are exploring how we may expand NSF outreach at professional meetings to foster improved interaction and communication between current and potential CMMI grantees.</p> <p>Considering the evaluation by Dr. King and the experiences of the 2011 CMMI Grantees Conference, the division charged a working group to redefine the goals for the conference, evaluate the 2011 Grantees Conference, and propose new ways to organize the conference for the future.</p> <p>CMMI is working closely with its current conference university partner (Northeastern University who will be sponsoring the 2012 conference in Boston), to meet the needs of all stakeholders. Northeastern's organizing committee, working with its counterparts at NSF is developing a technical program that allows flexibility to meet the needs of the entire CMMI community.</p>
<p><i>To improve their ability to meet goals and objectives, the division's mission statement should be sharpened. It should be succinct and the connection between vision, mission, goals, and objectives should be clear.</i></p>	<p>We agree, and this will be part of the development of an improved divisional plan, which is a high-priority item on the agenda for FY 2010.</p>	<p>As the strategic planning for the Directorate is still ongoing, the division is likewise continuing to develop its divisional plan and aligning it with those of ENG and NSF. We anticipate having this revised CMMI document in the coming fiscal year.</p> <p>As noted above, the division conducted programmatic reviews of its 20 research-funding programs and is now working to synthesize these strategic visions in terms of NSF/ENG goals as well as other national priorities.</p>
<p><i>To promote the programs, it is necessary that more travel</i></p>	<p>This has been a recurring issue that has dominated discussion of COVs</p>	<p>Travel funding is still an issue, however the division has developed</p> <p>Travel funding continues to be an issue, especially in this time of</p>

<p><i>funds be made available to program directors that hold permanent employment with NSF. The current dichotomy between program directors who are rotators and non-rotators in travel fund budget should be eliminated.</i></p>	<p>for decades. It is an issue across ENG and NSF as a whole, as noted by NSF Director Arden Bement at the Fall 2009 ENG Advisory Committee, because while funding for research support has increased, NSF overhead budgets have remained constant. CMMI is careful to allocate overhead funds in a manner that preserves the maximum possible amount for permanent staff travel. However, this still leaves the permanent program directors quite short of funds. It is a problem that cannot be solved by CMMI, other than to maintain a high priority on the use of such funds for staff travel.</p>	<p>procedures to ensure travel is well justified by all staff members through better internal tracking and evaluation. Such internal guidelines ensure proper stewardship of limited funds and equity among all staff.</p>	<p>budget uncertainty. All travel requests are reviewed by division leadership to ensure that they are well justified, and requests are prioritized as necessary regardless of type of staff proposing travel.</p> <p>The division is encouraging the use of telepresence to ensure program directors can function as leaders in their community and meet with various stakeholders without the need for travel.</p>
<p><i>[For the next COV,] the CMMI director should initially, give a division overview and should be available throughout the COV visit. Areas should be emphasized that directly pertain to the questions addressed by the COV.</i></p>	<p>A more comprehensive briefing will be presented at the next COV.</p>	<p>No action during this year.</p>	<p>No action during this year, however in planning for upcoming FY2012 COV, this concern will be addressed.</p>
<p><i>It might be appropriate to hold the COV meeting at a different time than the annual CMMI conference so that the COV could have more focused attention from the program officers and provide less stress on the support staff.</i></p>	<p>This is what was originally planned for the 2009 COV. The two activities will be kept separate during the next Committee of Visitors.</p>	<p>No action during this year,</p>	<p>No action during this year, however in planning for upcoming FY2012 COV, this concern will be addressed.</p>
<p><i>[For the next COV,] a senior program officer should be given specific charge: a. To walk through the CMMI review process to assure that people and facilities that the COV is likely to need are</i></p>	<p>The web-based approach and location of the meeting gave rise to unanticipated issues. We will ensure that things go more smoothly for future COVs.</p>	<p>No action during this year.</p>	<p>No action during this year, however in planning for upcoming FY2012 COV, these concerns will be addressed.</p>

readily available.

b. To assure that the COV has all documentation necessary to answer the broad questions charged of them.