



April 21, 2015

The Honorable Lamar Smith, Chairman  
House Committee on Science, Space, and Technology  
2321 Rayburn House Office Building  
Washington, DC 20515

The Honorable Eddie Bernice Johnson, Ranking Member  
House Committee on Science, Space, and Technology  
394 Ford House Office Building  
Washington, DC 20515

Dear Chairman Smith and Ranking Member Johnson:

I am writing on behalf of the American Educational Research Association (AERA). AERA is the national scientific association of more than 25,000 members dedicated to the advancement of scientific research on teaching and learning, prominently including STEM education. AERA is also an active member of the Coalition for National Science Funding (CNSF), and our own membership is interdisciplinary and spans many fields of science in addition to education research.

AERA appreciates the important responsibility under the aegis of the House Committee on Science, Space, and Technology to steward the National Science Foundation (NSF) to advance science and discovery in the United States. AERA has serious concerns, however, that aspects of the America *COMPETES Reauthorization Act* of 2015 (H.R. 1806) are inharmonious with the foundational goals of NSF and science. In fact, several provisions in the bill could actually limit the NSF's ability to fulfill its statutory purpose.

The National Science Foundation has led the United States internationally in scientific discovery. In recent years we have been facing serious challenges to our scientific global leadership. Now is not the time for flat funding or to constrain our nation's brightest scientists. Rather, we must continue to invest in the most compelling science to nurture scientific breakthroughs, advance fundamental knowledge across all fields of science and prepare our next generation of scientists.

Because of some major flaws, AERA opposes the current draft:

Funding by Directorate - Our most significant concern regarding H.R. 1806 is the intent to authorize by Directorate. This is a departure from previous *America COMPETES Acts* that provided a top line amount for Research and Related Activities. Authorizing by Directorate would constrict NSF's flexibility to direct funding to the best proposals to fulfill their mission to "*promote the progress of science; to advance the national health, prosperity, and welfare; to secure the national defense; and for other purposes.*"

These concerns are shared by the broad scientific community. We urge the Committee to refer to the *Guiding Principles for the America COMPETES Act Reauthorization*. This document was

developed by preeminent scientists and endorsed by over 130 organizations representing the broad science community.

According to congressional reports and floor comments from that time, two considerations informed the decision to move away from NSF Directorate-level funding to a broad Research and Related Activities top line budget. The stated intention was to provide NSF with greater flexibility to fund the very best science and the second compelling reason was that the House leadership acknowledged the incredibly complex task of balancing grant pressure, priority areas, and funding history, and deferred to the more capable Director of CNSF. We share the sentiments. While we respect the role of the Congress to establish the broad priorities of NSF, AERA believes that we should rely on the expertise and mandated function of NSF to determine the science to best address those priorities and increases NSF accountability for these crucial decisions.

Recalibration of NSF Funding - The current NSF budget and administration's request reflect an agency budget that has evolved as a result of the internationally recognized merit review process in combination with the congressionally guided broader impacts and intellectual merits.

The *America COMPETES Act*, as introduced, flat funds the Education and Human Resources Directorate and makes significant cuts to the Social, Behavioral and Economic Directorate. By significantly changing the resource allocation to award competitively reviewed proposals, Congress is undermining the scientific expertise that they have worked so hard to develop at the NSF.

Furthermore, the EHR and SBE Directorates play critical roles not only progressing science in the United States, but also meeting the mission on the NSF. The EHR Directorate supports all aspects of the NSF mission and most directly bolsters the national prosperity and welfare by developing a competitive STEM workforce and a STEM literate citizenry. Science made possible through the SBE Directorate has informed policy decisions that have improved the safety and security of our nation.

Section 106 - Finally, we are concerned about Sec. 106. We would welcome the opportunity to better understand the intention of the language to provide a 'public justification of why a project was funded and how it is in the national interest.' The National Science Foundation exists to fund the highest quality research to best serve the national interest.

Thank you for the opportunity to comment on the *America COMPETES Act*. We look forward to working together to shape a bill that enables the NSF to be the preeminent driver of scientific discovery internationally.

Sincerely,



Felice J. Levine, PhD  
Executive Director