

*AAU Association of American Universities*  
*COGR Council on Governmental Relations*  
*NASULGC National Association of State Universities and Land-Grant Colleges*

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January 30, 2006

Mr. Mark Weiss  
White House Office of Science and Technology Policy  
[MWeiss@ostp.eop.gov](mailto:MWeiss@ostp.eop.gov)

Sent by Email

Dear Mr. Weiss:

The Association of American Universities (AAU), the Council on Governmental Relations (COGR), and the National Association of State Universities and Land-Grant Colleges (NASULGC) appreciate this opportunity to offer our collective comments on the Proposed Principles for Federal Support for Graduate and Postdoctoral Education and Training in Science and Engineering developed by the Office of Science and Technology Policy (OSTP) (published in the *Federal Register*, November 16, 2005 (vol. 70, no. 220, pp. 69563-69565)). Together, our associations represent the largest research and graduate universities in the United States.

We view OSTP's efforts to develop principles for federal support of graduate and postdoctoral education and training in science and engineering as a reaffirmation of the importance of doctoral and postdoctoral education to the national interests. We offer our comments in the spirit of collaboration.

For the last 60 years, the United States has led the world in science and technology. This in turn has contributed greatly to our nation's security and economic prosperity. American scientific and technological leadership can be traced directly to research and graduate education supported by the federal government and conducted at our nation's universities. This partnership has been essential to our nation's security and prosperity.

Our organizations, in chorus with others in academia and business have in recent months called attention to a number of troubling signs for the U.S. in the areas of science, technology, and innovation. Our nation's leadership in these areas was unquestioned not so long ago. We are convinced that, unless the United States is able to refocus its energies on our ability to innovate and compete globally, our nation is jeopardizing its economic and national security. To this end, we believe that enhancing our country's graduate education system is a measure that must be taken to help our nation's continued prosperity and security. Given these concerns, we believe that the Proposed Principles from OSTP are especially timely and important.

## The Goal of “Consistency”

In the Proposed Principles, the OSTP argues for “consistency” in policies from the various federal agencies with respect to support for graduate education. The Proposed Principles state:

This process is intended to support the agencies’ use of the six principles on a continuing basis, in order to increase collaboration and *consistency* (emphasis added) within the Federal government for supporting graduate and postdoctoral education and training in science and engineering.

We appreciate the federal government’s recognition of the difficulties that the lack of policy coordination among and consistency across federal agencies can sometimes create for universities. For example, academic departments sometimes must deal with budgeting and hiring uncertainties because of the lack of consistency. We believe that, conceptually, consistency is a goal that the federal government should pursue.

While we believe that consistency in principles across the agencies would be beneficial in many cases, we caution against the pitfalls that consistency in policies can bring. We are wary of strict adherence to uniform and rigid standards without any consideration given to the need for variations in policies at different agencies. Such consistency could harm graduate and postdoctoral education. Two hallmarks of the American higher education system are its diversity and flexibility to address discipline-specific needs. Some of the current policy differences between federal agencies provide opportunities for flexibility that benefit the federal government, universities, students, and postdocs. We believe such beneficial differences should be retained where possible. Consequently, we ask that consistency not be pursued for its own sake. Rather, we encourage OSTP to uphold consistency as a goal of making comparable those policy elements that are widely regarded as beneficial to all parties.

## Definitions of Other Terms and Phrases

In addition to our concerns about the interpretation and potential implementation of “consistency,” we would like to take this opportunity to note similar questions and concerns about other important terms used in the Proposed Principles.

- “Partnership”

In principle, we agree with the statement that “[f]ederal contributions toward graduate and postdoctoral education and training are provided in partnership with academic and other non-federal institutions.” We understand and appreciate the partnership in our nation’s graduate education system.

Doctoral education has multiple sources of financial support, including universities, nonprofit organizations, state governments, and the federal government. Doctoral education is largely a national resource, and consequently, the federal government is the primary source of financial support. The federal government’s goal should be to provide the resources necessary to attract and support talented individuals to help meet national needs. Universities provide the doctoral education programs, faculty, and facilities necessary to provide a high-quality education geared toward meeting national needs. As a result, universities are responsible for making their education and research programs the best possible.

It is our hope that the partnership will not be distorted by decreases in federal support. Each partner must fulfill its responsibilities. We hope that the OSTP shares our view, and encourage OSTP to reflect this concept of “partnership” in the final principles.

- “Quality”

We also agree with OSTP that graduate students and postdocs must receive quality education and training. OSTP acknowledges in the Federal Register notice the critical roles that merit review and expert advice play in award decisions. We agree that these are the soundest ways of ensuring that federal support is effectively allocated to talented students and high-quality programs. The remaining steps of ensuring quality education and training should continue to be the responsibility of the academic community. We take this responsibility seriously as part of the government-university partnership, and we urge that any principle addressing quality recognize and support this institutional responsibility.

- “Adequately Supported”

We also agree with the principle that “graduate students and postdoctoral scholars should be adequately supported to encourage their pursuit of science and engineering careers” and that “[l]evels of support provided by agencies should be reasonable and commensurate with the level of education and experience of the recipient.” The federal government should provide the support necessary to attract very talented students, who have other enticing education and career options, into science and engineering doctoral programs. The federal government and universities should work together to determine the level of support that is necessary to attract top students so that they can complete their degrees in a timely manner and pursue careers important to national needs.

We should note that the use of the term "reasonable" seems unnecessary and vague in this proposed principle. Also, we caution against the temptation to establish “one-size-fits-all” standards and guidelines for levels of that support. Federal policy should strive to ensure that levels of support meet national needs, and it should provide flexibility to allow different needs and goals to be addressed. We urge OSTP to make this clear in the final principles.

- “Collaborate”

We applaud the principle that “federal agencies should collaborate in areas of common interest.” This should be done to the greatest extent possible so as to create a more coordinated system. We caution against the possible adoption or promulgation of the same policies or standards for the sake of simplicity and “collaboration.” As with the goal of “consistency,” we believe that the system must take into account differences and variations among disciplines, institutions, and agencies. We encourage you to recognize in the final principles that collaboration does not mean rigid homogenization of federal policies.

### Principles Should be Expanded to Cover Other Disciplines

Our associations are fully aware that OSTP is responsible for setting and guiding national policies on science and technology. At the same time, we submit that the arts and humanities also play a valuable role in the formation of our intellectual infrastructure. Graduate students in these disciplines make contributions that may be different from, but are no less important than, those in mathematics,

engineering, and the sciences. We hope that the principles, if and when adopted, would also be applicable to federal support of these disciplines.

### Implementation

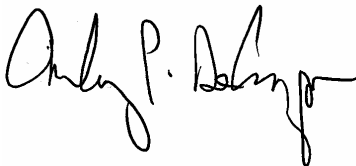

A set of sound principles for federal support for graduate and postdoctoral education could serve our nation's graduate and postdoctoral education enterprise well. At the implementation stage, we request that OSTP invite further input from the university community. We are ready to work with OSTP and other federal agencies to develop a sensible implementation plan that will strengthen this nation's system of post-baccalaureate education.

### Conclusion

Our associations, and the institutions we represent, are grateful for OSTP's understanding of the importance of graduate and postdoctoral education to our nation's prosperity and security. We thank OSTP for inviting comments on these important Proposed Principles. We hope you will receive these comments in the spirit of collaboration and cooperation in which they are intended.

Please do not hesitate to contact staff at our associations about the comments we have offered in this letter. Please feel free to contact the following staff in our respective organizations: Matt Owens, AAU 202-408-7500; Carol Blum, COGR, 202-289-6655; and Sang Han, NASULGC, 202-478-6079.

Sincerely,



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