



ASSOCIATION OF
AMERICAN UNIVERSITIES

ASSOCIATION OF
PUBLIC AND
LAND-GRANT
UNIVERSITIES



July 2, 2013

The Honorable Sylvia Mathews Burwell
Director
Office of Management and Budget
Executive Office of the President
725 17th Street, NW
Washington, DC 20503

The Honorable John P. Holdren
Assistant to the President for Science and
Technology and Director
Office of Science and Technology Policy
Eisenhower Executive Office Building
1650 Pennsylvania Avenue, NW
Washington, DC 20504

Dear Ms. Burwell and Dr. Holdren:

On behalf of the more than 200 U.S. research universities that our associations represent, we write regarding the proposal in the Administration's FY 2014 budget to consolidate and reorganize federal science, technology, engineering, and mathematics (STEM) education programs.

We agree with the Administration that there is a need for greater coordination and coherence among federal STEM education programs, and we appreciate the Administration's leadership in offering a bold proposal. We are disturbed, however, with the non-transparent process by which this proposed consolidation was developed as a part of the FY 2014 budget process. The proposal appears to us to have pre-empted the work of the National Science and Technology Council Committee on STEM Education (CoSTEM). While the *Federal Science, Technology, Engineering, and Mathematics (STEM) Education 5-Year Strategic Plan* released by CoSTEM earlier this month appears to reflect the budget proposal, we have serious concerns that there was significant pressure on CoSTEM to adapt their plan to fit the budget proposal after it was released, as opposed to basing the budget proposal on input from CoSTEM. We are further concerned that the Administration has provided no formal mechanism to seek stakeholder input concerning the STEM reorganization proposal, about which we have heard significant concerns from our member universities.

One of the concerns we have heard from our member institutions and which we would encourage the Administration to address immediately relates to discontinuation of certain existing awards in programs that are slated for consolidation and elimination. In anticipation of the Administration's consolidation proposal, some of our member universities have been notified by some federal agencies that their STEM education programs will be curtailed and others no longer funded during the current fiscal year (FY 2013). Other federal agencies have begun sending notices of program terminations in the upcoming fiscal year. We strongly believe that agency implementation of the proposed consolidation program should not begin in any program in FY 2013, or in future years, until Congress has had an opportunity to consider and review the proposal. We are concerned that some agencies may be unilaterally shutting

down or curtailing programs and that agencies that are slated to take on new responsibilities under the proposal would not have the funding to do so.

In addition to some agencies' prematurely discontinuing STEM programs in FY 2013 in response to the consolidation proposal, as representatives for the bulk of doctoral degree granting institutions in the nation, our associations are particularly concerned about elements of the consolidation plan that propose to move and eliminate some graduate fellowships and traineeships focused on specific scientific disciplines and workforce interests closely aligned with particular agencies' missions. For example, while the National Science Foundation (NSF) manages some of the nation's most effective graduate fellowship programs, we are concerned about the appropriateness of housing additional programs closely tied to the missions of other agencies—like the Department of Energy's Computational Science Graduate Fellowship and the Environmental Protection Agency's STAR Fellowships programs—within NSF. It is important that any new plan for reorganizing federal STEM education graduate programs thoughtfully consider how such a reorganization will continue to maintain graduate fellowship programs aimed at fulfilling the distinct workforce needs of specific mission-oriented agencies if these programs are moved to the NSF.

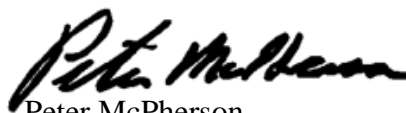
In light of these concerns, we respectfully request that OMB and OSTP provide a formal mechanism for public comment on the budget proposal and the *Federal Science, Technology, Engineering, and Mathematics (STEM) Education 5-Year Strategic Plan* released earlier this month. In other areas affecting the university and scientific research community, such as public access to federal funded scientific research results, this Administration has actively sought and considered the views of stakeholders. This process of stakeholder engagement has resulted in much more transparent and robust policies. We believe the Administration's proposal for STEM education consolidation could benefit from a similar process for stakeholder engagement and comment. Such a process would help to ensure stakeholder buy-in and ultimately strengthen the resulting policy and make its implementation more effective.

Thank you for your consideration of this request.

Sincerely,



Hunter Rawlings III
President
Association of American Universities



Peter McPherson
President
Association of Public and Land-grant Universities

cc: Dr. Cora Marrett, Acting Director, National Science Foundation
Dr. Joan Ferrini-Mundy, Assistant Director, Directorate for Education and Human Resources, National Science Foundation, and Co-chair, Federal Coordination in STEM Education Task Force (FC-STEM)
Dr. Leland Melvin, Associate Administrator for Education, National Aeronautics and Space Administration, and Co-chair, Federal Coordination in STEM Education Task Force (FC-STEM)