April 17, 2013

The Honorable Sylvia M. Burwell
Director Designee, Office of Management and Budget
The Executive Office of the President
Eisenhower Executive Office Building
1650 Pennsylvania Avenue, NW
Washington, DC 20503

Director Burwell:

On behalf of the nation's professional science and technology community, we respectfully request your consideration regarding Office of Management and Budget Memorandum M-12-12, which concerns federal employee participation in conferences. The science and technology community supports careful oversight of federal employee meeting and travel expenditures, and the need for fiscal responsibility and transparency in the use of public funds. However, we believe that as OMB Memorandum M-12-12 is currently being interpreted and implemented, it is having the unintentional consequence of restricting the open exchange of ideas among scientists, engineers, and technologists, and thereby adversely affecting important national interests by throttling back on the U.S. innovation engine.

We ask that you address this issue to prevent Memorandum M-12-12 from being applied in a way that hampers the legitimate and necessary interactions among scientific and technical researchers who work across government, industry, and academia – interactions that drive the advancement of technology that is vital to our economy and our national security. OMB Controller Daniel Werfel, in a meeting on March 5th with several associations, acknowledged the problem and voiced his willingness to seek a path forward. We look forward to engaging with him more on this issue.

Specifically, we ask that you affirm the Administration's support of these open exchanges of information, and amend OMB guidance to specifically exempt federal employee travel to conferences, seminars, and meetings where attendance promotes agency interests as well as the professional development and competency of government scientists, engineers, or other specialized experts. (This would be similar in spirit to the exemption from restrictions on federal employee participation in "widely attended gatherings" that is found in 5 CFR 2635.204(g)(2), and to the provision allowing government employees to serve in the governance of nonprofit organizations that is found in 5 CFR 2640.203(m).)

Further, we request that you clarify that Memorandum M-12-12's definition of meetings does not cover meetings involving Federal Advisory Committees, the National Academies, standards-setting bodies, industry-government workshops and conferences, or official international engagements.

Permitting federal employees to participate in professional meetings allows them to appropriately interact with their colleagues from other agencies, our military science directorates, universities, and industry to help facilitate the intellectual exchanges that are central to their jobs, the technology transition process, and national interests. Each sector – industry, government, and academia – approaches problems from a different perspective. It is the creative synthesis of these various perspectives, methodologies, and motivations that drives American innovation. The absence of one sector in the collaborative process hinders the progress of science and technology on which the American economy and our national security depend.

The purpose of scientific and engineering conferences is to foster and encourage these vital collaborative interactions. They serve as the focal point of scientific and engineering communication across industry, academia, and government. The formal presentation of peer-reviewed research, the casual conversations that occur while attending meetings, and the ability to expand one's horizons and examine problems in a new light result in unanticipated and important connections being forged, not only in technical arenas, but also in policy and program areas. It is precisely this kind of unanticipated stimulation that led to the commercial use of GPS satellites for telecommunications, for automotive and maritime location assistance, and a myriad of other commercial applications of a technology originally developed for military purposes.

In addition, conferences allow young professionals to meet, interact with, and be mentored by senior researchers in their field. This gives them access to the wealth of knowledge and experience of veteran researchers, allows them to capitalize on "lessons learned" from the trial and error of previous programs, and provides continuity in the transfer of crucial institutional knowledge. Young engineers are able to build a support network that provides insight and counsel as they look to overcome challenges in their own work. Students, both undergraduate and graduate, also benefit from attending conferences with professionals from academia, government, and industry. They are introduced to new ideas and diverse methods they may not otherwise experience, giving them a broader perspective from which to pursue not only their studies but also their careers. Professional pipeline development like this also saves taxpayer money, since new programs do not have to relearn old lessons and reinvent successful processes.

As written and as currently implemented, the directives in M-12-12 stand in stark contrast with the December 17, 2010 memorandum on "Scientific Integrity" by the director of the Office of Science and Technology Policy (OSTP), Dr. John P. Holdren. Under Part IV, "Professional Development of Government Scientists and Engineers," the OSTP memorandum calls for agencies to "[e]ncourage presentation of research findings at professional meetings" and "[a]llow full participation in professional or scholarly societies, committees, task forces, and other specialized bodies of professional societies…." This reflects the important role these meetings and organizations play in the professional development of the individual scientist or engineer, and in the advancement of the state of a given discipline and of technology in general. Further, that memorandum endorses the notion that scientific integrity and progress are aided when data and research are subjected to appropriate "independent peer review by qualified experts" – which is the

very foundation of the existence of professional societies and of presentations at professional technical conferences and symposia.

Since both Congress and the Administration have demonstrated a high-priority emphasis on scientific research and engineering advancement as critical functions of the federal government, we encourage you to consider not only how OMB policies and procedures can ensure appropriate oversight, but also how to minimize any negative impact on the U.S. scientific and engineering enterprise, so as to exercise appropriate oversight and responsibility without inadvertently jeopardizing our technological advantages and the vitality of the American "innovation engine" and of the technical workforce that drives it forward.

If you have any questions or need further information, please contact Steve Howell at 703.264.7625 or steveh@aiaa.org. Thank you for your consideration.

Sincerely,

Sandra Magnus, Executive Director
American Institute of Aeronautics & Astronautics

Marc Apter, President
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Michael Hirschberg, Executive Director
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Eugene Arthurs, Executive Director
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Charlie Spahr, Executive Director
The American Ceramic Society

cc: Dr. John P. Holdren, Director
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