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Ronald C. Baird, Director
NOAA National Sea Grant Office
1315 East-West Highway
Silver Spring, MD 20910

Dr. Baird:

Thank you for the opportunity to comment on the *Revised Policy on NSGO Final Evaluation and Merit Funding*. Overall, we believe this is an innovative plan that meets legislative needs while preserving, to the maximum extent possible, the likelihood of programs to continue to be rewarded for strong performance.

Recognizing that the quality of the reviews are dependent on the appraisals of the PAT (Program Assessment Team) and NSGO, we believe it is of utmost importance to ensure transparency in the evaluation process and elucidate the judgments of the reviewers. The Sea Grant Association's (SGA) feedback on the *Revised Policy* concerns timing, changes to ratings over time, balancing merit and bonus funding, use of PAT scores, and previews of Final Evaluations. The comments are a compilation of feedback received from responding Sea Grant Directors to our request for their assessments and are offered with the intent of gaining a better understanding of, and, we hope, providing useful input to the revised evaluation and merit funding plan. More detail on each topic mentioned is included under the subheadings below.

Timing

SGA's greatest concern is how long it has taken to issue Final Evaluations this year. The programs need some assurance that the final evaluation will be conducted and the results communicated expeditiously. There are three main reasons for this:

1. Certain Universities synchronize the internal assessment of their Sea Grant Program and Sea Grant Director based in part on the National PAT review. Therefore, some University administrators expect to receive a timely report to help them determine program standing within their institution.
2. Delays in issuance of the Final Evaluations make it extremely hard for Sea Grant Directors and staff to plan budgets for the next year's omnibus.
3. Delays of over one month from the time the Final Evaluation is made and the receipt of the Final Evaluation by the university sends an indirect message that the process is not very important.

Changes to Ratings over Time

SGA would like some clarification of how and under what circumstances ratings would be revised in the “outyears” of a program’s evaluation cycle. A better understanding of the pathway and basis for such decisions now might make it easier when it happens. We suggest the NSGO describe in detail a realistic example of how the ratings will/could change over time at the next SGA meeting.

The Directors are also concerned with the possibility that a program placed in one category one year may be placed in a lower category the next year without the benefit of further data provided by or discussion with the affected program. A change in status will be very difficult for Sea Grant Directors to explain to University CEOs.

There are some concerns about what Directors should tell University administrators about revised ratings or categories in any of the outyears. Will University administrators also be copied on any correspondence in the future that tells if a program ranking goes down or up in subsequent years?

If the NSGO proceeds with the proposed process as now outlined in the policy document, the SGA strongly suggests that the affected Sea Grant Program, through the Sea Grant Director, receive a notification of a change of status (either in checklist ratings or in category) accompanied by a detailed statement that explains and justifies such change in status.

Balancing Merit Funding and Bonus Funding

SGA is concerned about the distinction between merit funding and bonus funding. Will the amount of funding available for merit funding be limited to the amount of merit funding that is already in the current pool? Will all additional funding received through appropriations in excess of the FY03 level be put in the bonus funding pool? Does this mean that only existing funds will be recycled to cover merit fund allocations?

SGA would like to see the merit fund pool increased significantly so that as many programs can benefit as possible. The document leaves the amount to be put into the merit and bonus pools unclear. SGA would like to see more funds go to the merit pool such that the bonus pool would end up small relative to the merit pool. It is critical to the improvement of the overall network of state Sea Grant programs to preserve as much of the merit pool as possible to help programs grow and improve.

Planning and Budgeting for Bonus Funding

SGA is concerned about how Directors are going to be able to plan and budget for Bonus Funding if bonus funding might exist one year and then disappear the next. This does not allow the programs to plan activities that are more than one year in duration. With this proposal, bonus funds may end up spent without much impact. To address this, SGA requests that both merit and bonus funds be added to the program’s core grant accounts via an amendment so that these funds have a potential life of four years, plus any no-cost extensions, regardless of when they are received.

Use of PAT Scores

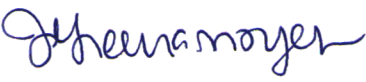
SGA suggests that the PAT score be more substantially, if not structurally, linked to the Final Evaluation in a manner consistent with the recommendations of the Toll Report. The NSGO Final Evaluation, perhaps influenced by the response of the program Director to the PAT review document, should be transparent and fully justified in relation to the PAT report.

Previews of Final Evaluations

The NSGO should send a preview or draft copy of the Final Evaluation to the Sea Grant Director to respond to in case there are mistakes, misunderstandings or misconceptions from the NSGO review before they just send it to the responsible University officials.

Thank you again for the opportunity to comment. We stand ready to work with you to increase the overall performance and effectiveness of the Sea Grant network.

Sincerely,

for 
Dr. Robert R. Stickney
President