

Date: Sun, 20 Mar 2011 16:17:53 -0400

To: "Dr. Baruch Fischhoff - Chair, National Academy Committee on Improving Intelligence" <baruch@cmu.edu>, "Dr. Theda Skocpol - National Academy of Sciences and Past President, APSA" <ts@wjh.harvard.edu>, "Bill Nordhaus - National Academy of Sciences" <william.nordhaus@yale.edu>, "Dr. David Shaw - PCAST" <dshaw@blackpointgroup.com>, "Dr, Gene Rosa - Chair, AAAS Section K" <rosa@wsu.edu>, "Dr. Carole Pateman - President, APSA" <pateman@ucla.edu>, "Dr. Robert Keohane-National Academy of Sciences" <rkeohane@princeton.edu>, "Dr. Robert Axelrod - National Academy of Sciences" <axe@umich.edu>, "Dr. Jonathan Cole - CASBS" <jrc5@columbia.edu>, "Dr. Richard Atkinson - Chair - NRC/DBASSE" <rcatkinson@ucsd.edu>, "Dr. G. Bingham Powell, Jr. - APSA Vice President" <gb.powell@rochester.edu>, "Dr. Kenneth Prewitt - Chair, Committee on Social Science Evidence for Use" <kp2058@columbia.edu>, "Dr. Kwame Anthony Appiah - Chair, Exec. Committee, American Council of Learned Societies" <kappiah@Princeton.EDU>, Dean David Ellwood <david_ellwood@harvard.edu>, "Prof. Derek Bok" <derek_bok@harvard.edu>, "Dr. Mitchel B. Wallerstein - Dean" <mwallers@syr.edu>, "Dr. Nina Fedoroff - AAAS President" <nvf1@psu.edu>, "Daniel Lauretano - Counsel to the National Science Board" <dlaureta@nsf.gov>

From: Lloyd Etheredge <lloyd.etheredge@policyscience.net>

Subject: 251. Red Team: DNI Responsibilities v. NSF's unwritten rules and Merit Review/integrity breakdowns

Dear Dr. Fischhoff and Colleagues:

I suggested, earlier, that General Clapper appoint a Red Team to review the conventional assumptions, within the DNI system, about the work of NSF related to the DNI's areas of responsibility. There are several routes by which integrity breakdowns can be corrected, and faster learning rates achieved, by the DNI's oversight review and specification of goals and NSF performance measures via the GPRA and other mechanisms.

NSF's Unwritten Rules

As further background, I forward a letter expressing, to the Director of NSF and the President of the National Science Board, concern about the use of unwritten rules to accommodate to Republican demands while retaining a public image of scientific integrity. There are serious reasons to question, in upgrading the current NSF Merit Review process, whether President Obama's directive of March 9, 2009 and the "clear and unconditional" principles of scientific integrity have corrected NSF's problems.

These unwritten rules seem to include, for example, measures and databases that bear (even indirectly) on the study of racial prejudice, ethnic relations, and racism effects in the US. Also, testing the bold predictions of hierarchical psychodrama models concerning unrecognized brain mechanisms that affect STEM education and other cognitive and behavioral issues, including new theories of political and economic participation by lower status populations in America.

There are many routes by which bold, innovative, and useful ideas that can help us to understand political behavior and ethnic conflict abroad - e.g., the new hierarchical psychodrama paradigm - can disappear at NSF because of these unwritten (domestic) rules that do not weigh scientific benefits for understanding the world beyond the water's edge.

LE

Date: Sun, 20 Mar 2011 15:38:54 -0400

To: "Dr. Subra Suresh - Director, National Science Foundation" <ssuresh@nsf.gov>, alerner@nsf.gov

From: Lloyd Etheredge <lloyd.etheredge@policyscience.net>

Subject: NSF Merit Review problems and unwritten rules

Cc: "Dr. Ray M. Bowen - Chair, National Science Board" <r-bowen@tamu.edu>, mvanwoer@nsf.gov, ksilverm@nsf.gov, dlaureta@nsf.gov, weward@nsf.gov, cdi@nsf.gov, hblount@nsf.gov, dacarter@nsf.gov

Dear Dr. Suresh and Dr. Bowen:

I enclose, for the public record, a letter of March 19, 2011 with additional comments concerning repair of the continuing breakdowns in NSF's Merit Review system for individual grants and agenda-setting strategic investments. This letter addresses unwritten rules and, also, their application in meetings behind closed doors.

Yours truly,
Lloyd Etheredge

Dr. Lloyd S. Etheredge

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March 19, 2011

Dr. Subra Suresh, Director
National Science Foundation
&
Dr. Ray Bowen - Chair, National Science Board
4201 Wilson Blvd.
Arlington, VA 22230

Re: Merit Review - Full Disclosure of NSF's Unwritten Reasons for Rejections

Dear Dr. Suresh and Dr. Bowen:

I write to follow up my letter of March 6, 2011 to Dr. Suresh and to file a further public comment for the repair of NSF's Merit Review system.

My recommendation, based on observing problems in the Social, Behavioral and Economic (SBE) sciences across several decades, is that all entities involved in the NSF process should disclose candidly, in writing, all rules and real reasons involved in rejecting or deflecting individual grant applications and innovative lines of investigation and infrastructure investments.¹ This includes all decisions that are made behind closed doors.

A More Credible Enforcement System

There also should be swift and reliable enforcement when the people in the NSF/NSB process violate or evade the rules. The best solution would be a Scientific Integrity Board, fully independent of NSF and other government scientific agencies, with full subpoena and other investigative powers, to receive appeals and assure swift investigations and serious legal penalties. NSF's Inspector General system is not designed to deal with accommodations to political and societal (including controversy-avoiding) contaminations of the NSF review process, especially when these are transmitted by the NSF Director, his senior appointments, and the

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URL: <http://www.policyscience.net>

National Science Board's actions and silences.

Given the Republican era breakdowns, NSF might improve its integrity by formal oaths - similar to those expected of juries - from everybody involved attesting, under a legal penalty, that all decisions are fair, impartial, made only on the scientific merits of the proposals, and that the real reasons for the decision are fully disclosed in writing.² Such oaths also should be taken by the National Science Board.

An Example: Will NSF Support Neuroscience Research Concerning Brain Mechanisms and Effects of Racism Inhibiting STEM Achievement?

Here is a specific, recent example of NSF's inherited problems of unwritten rules: Last year I briefed Assistant Director (SBE) Gutmann about several Recaptalization ideas, including the hierarchical psychodrama paradigm that offers an exciting and transformative new approach that could benefit many areas of basic and applied SBE research. Because of NSF's high priority for STEM education, I also discussed the potential of the new paradigm and its new measures to predict and reveal unexpected mechanisms of hierarchical psychodramas that could activate followership/social submission mechanisms in the brain and inhibit motivation and cognitive functioning involved in STEM education (e.g., Blacks in inner city schools). Dr. Gutmann said sharply: *"This is [the study of] racism. This is the National Science Foundation! The National Science Foundation does not study racism!"*

This is the kind of unwritten rule [which Dr. Gutmann did not retract, after a follow up letter] to which I refer. Earlier, people in NSF processes cited other reasons to deflect or kill (without putting anything into writing) the new, competing hierarchical psychodrama paradigm *because* it had powerful scientific merits for rapid and useful learning - for example, because the measures could quickly test Republican claims of hierarchical psychology and a growing dependency syndrome in an American welfare state (and the claims for deregulated "free markets" that zealots and lobbyists said were a moral and psychological imperative). . . . NSF is supposed to be politically independent but, in reality, people with vivid imaginations about potential controversy, or political battles with adverse effects on the national science budget (etc.) come out of the woodwork: Today, there is no due process mechanism for NSF accountability that allows applicants to know the different, unwritten rules that might be applied or to fight unwritten, illegitimate rules that are applied behind closed doors.³

What are NSF's Unwritten Rules?

I have a related concern about inconsistency and mistakes in knowing and applying unwritten rules. For example: I doubt that Dr. Gutmann understood the Obama Administration's policies and NSF's unwritten rules.

Specifically, during an earlier investigation [because of an ethics case that had arisen at the University of Michigan]⁴ I asked NSF's Inspector General whether the unwritten Stockman Rule was causing trouble for studying the role of hierarchical psychodrama in American politics because it implied/predicted a new (and possibly more candid) theory of the effects of racism on political and economic participation? The Inspector General's investigator assured me, with a passion equal to Dr. Gutmann's current view, that NSF *did* fund the study of racism (and she offered to send me specific examples).

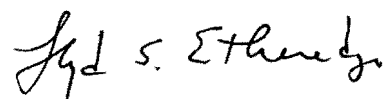
At this point, I doubt that members of the National Science Board know the unwritten rules that NSF has applied, *de facto*, to the SBE disciplines. (Often, in my perception, the unwritten rules are expressed by silences and sins of omission.)

Even without the intention of the National Science Board, unwritten and secret rules and suppression can be perpetrated by a bureaucracy because these provide two benefits: a.) they avoid controversy imagined to arise from the research itself (for which America's loud, aggressive, anti-activist Republican zealots have been awarded veto power); b.) they also avoid controversy potentially generated by a public disclosure of the controversial rule itself (e.g., the counter-belief that poorer Blacks are citizens too, and that they have a right to have status mechanisms limiting educational attainment studied without regard to race). [Also, because NSF has unwritten bureaucratic rules of controversy-avoidance, no NSF employee can rely upon the published rules and the institution's public claims of integrity and merit-based grants as being what the National Science Board really wants, even if it says that it is serious about Merit Review. (At the conclusion of a meeting with the Inspector General's staff to discuss the eroding performance of macroeconomic models and unwritten constraints imposed on the Committee on National Statistics, the IG's investigator noted that the National Science Board members also had received written filings about these issues and she inferred a message: She said, "If they want us to investigate this, they will tell us.")]

-The NSF Inspector General's earlier assurance (that studies whose data might disclose racial effects of status/ hierarchical psychodramas in America would be

treated at NSF without prejudice) notwithstanding, I actually worked to receive, and did obtain, a specific advisory ruling from Dr. Marburger's advisory committee. The recent Bush Administration recommended investigating effects of social and economic conditions on brain mechanisms - so Dr. Gutmann may have been incorrect even about the people who appointed him.⁵

Yours truly,



(Dr.) Lloyd S. Etheredge, Director
Government Learning Project

1. My recommendation is intended to be comprehensive and to cover NSF officials and advisory bodies, the National Science Board itself and advisory bodies at the National Academy of Sciences/National Research Council.

2. A review for the Department of Justice (cited earlier, and online at www.policyscience.net) found that the National Academy of Sciences uses an artful definition of conflict of interest with fine print that allows all of its members to recommend lines of research and new funding from which they can benefit personally and substantially. Their definition is that conflicts of interest can only arise in a current decision, not with respect to future decisions and competitive advantages. Thus, the National Science Board also must do a better job - including writing its own definitions and requiring oaths (etc.) - of preventing brilliant and manipulative members of the National Academy of Sciences (e.g., the Luce Commission) from exploiting their positions of national trust to manipulate merit evaluations and to secure competitive advantages. Also, the senior levels of the National Academy of Sciences need to be more ethical: they have known about, but failed to curtail, or notify NSF about, the *droit de seigneur* abuse affecting national SBE priorities and due process rights.

3. Political controversy should be acceptable. Indeed, cases of political and social controversy should be expected to emerge from NSF's Merit Review processes for the SBE disciplines.

Ultimately, the rate of creating reality-connected, and evidence-based social, economic, educational, and international (etc.) policy and the civic role of our universities are decisions, in a democratic society, for public battles. If social or political conservatives want to slow the pace of disruptive change by a "strangle in the cradle" policy, the American system of government requires that *de facto* restrictions on NSF and universities be imposed after public battles and concurrence from three branches of government.

4. The University of Michigan Administration allegedly removed part of a grant application because it imagined that the data set to study achievement motivation could be used to compute Black-White differences in achievement motivation. Thus, the officials also imagined, Washington bureaucrats would spot this potential and, without disclosing the reason for their decision, would kill the entire University of Michigan package. Dr. Gutmann probably was a

member of the University of Michigan Administration with responsibility for the social sciences at the time and would have known about the ethics controversy and the chilling effect of (real or imagined) unwritten rules.

In reality, federal scientific standards have been deteriorating. National probability samples with TAT based measures that could be used for N-Ach were obtained with federal funds in the mid 1950's, and again in the mid-1970's.

5. Actually, the (unwritten) OMB/Stockman Rule *exempted* all physically-based processes from the “No Initiative/Not Unless Requested to Do So” pre-censorship of academic research that Republican zealots successfully pressured scientific agenda-setting bodies to enforce. Today, the formal discovery that brain mechanisms are involved in almost everything renders the Stockman Rule moot for any SBE research (e.g., hierarchical psychodrama models) based in neuroscience. However this *caveat* may not be known or remembered in the affected bureaucracies and advisory committees.

However, NSF's problems of Merit Review might be deeper: I have had a member of an NSF advisory committee tell me that testing hierarchical psychodrama models - although presumably they are accurate about part of the world and the objection only is to research to confirm reality - “scares people,” but even Stockman's original Rule did not permit killing or resisting research simply because it aroused fear.