REVIEW FORM – RICE CERTIFICATION

Reviewer: Eric Johnson

1. Type of Application:

    New ☐   Renewal ☐   Revision **X**

2. Applicant Information:

Name: Southeast Coastal Ocean Observing System Regional Association (SECOORA)

3. Name and contact information of the U.S. IOOS Program Regional Point of Contact responsible for this RA application:

First Name: Eric

Last Name: Johnson

Telephone Number: 240-533-9456

Email: eric.t.johnson@noaa.gov

Reviewer Recommendation:
Approve ☐   Deny ☐   Pending ☐

Comments:

§997.21 Organizational Structure

    (b) A RICE's application shall:
        1) Describe the RICE's organizational structure (e.g., 501(c)(3) tax-exempt organization, establishment via MOU or MOA).

Yes ☑   No ☐   Pending ☐

Comments:

The description in the application meets the requirement. In support of this description, SECOORA submitted their 501(c)(3) Status Letter from the IRS and organizational By-Laws.

        2) Document the RICE's ability to satisfy applicable legal criteria for accepting and disbursing funds, and entering into agreements. Sufficient documentation may be provided in the form of: 1) evidence of a current grant, cooperative agreement, or contract in good standing with the Federal government; or 2) evidence of fiscal agreements, standard operating procedures for financial activities, and proof of an audit process.

Yes ☑   No ☐   Pending ☐

Comments:

Proof is provided that SECOORA is the recipient of a current NOAA co-operative agreement.

        3) Document the RICE's measures for addressing issues of accountability and liability. For this criterion, accountability and liability refer to the RICE's governance and management activities. Sufficient documentation may be provided in the form of 1) a conflict of interest policy for the Governing Board or governing body, which clearly states that a member of the governing board will declare any conflict of interest he or she may have and will recuse him or herself from associated funding decisions that may result in the Board member or a direct family member benefiting financially, and 2) a policy statement in the RICE's by-laws that addresses liability issues.

Yes ☑   No ☐   Pending ☐

Comments:

SECOORA has provided both a COI policy for the governing board and proof of Liability coverage for Executive Director, officers, committee members, and employees.

4) Describe the process the RICE uses to set priorities for distributing funds (e.g., requirement for Governing Board or governing body approval when responding to funding opportunities or adjusting to funding level changes in existing agreements); and

Yes ☐   No ☐   Pending ☐

Comments:

The description provided in the application meets the requirements.

5) Document the by-laws, signed articles of agreement, or any binding agreements that demonstrate how the RICE establishes and maintains a Governing Board or governing body. The documentation shall demonstrate:
    i. How the composition of the Governing Board or governing body is selected and how it is representative of regional ocean observing interests. NOAA defines "representative" in this specific context to include geographic, sector, expertise, and stakeholder considerations.

Yes ☐   No ☐   Pending ☐

Comments:
The description provided in the application meets the requirements.

    ii. How and with what frequency the RICE solicits and receives advice on RICE participant diversity, stakeholder coordination, and engagement strategies, to ensure the provision of data and information that satisfy the needs of user groups.

Yes ☐   No ☐   Pending ☐

Comments:
The application describes various forms of outreach but does not meet the certification standard of describing "repeatable process". Please clarify timelines under which SECOORA would seek this input and provide a clear reference to where that process is described whether in another guiding document or a stand alone one.

SECOORA Response: **SECOORA ensures appropriate outreach and engagement strategies through our _annual_ membership and stakeholder meetings, which occur in May of each year. These meetings are designed to encourage participation in SECOORA and identify member and stakeholder observing, modeling, and product needs. Additionally, SECOORA conducts a 4-state, large scale, stakeholder survey that corresponds with IOOS grant cycles (i.e. _every five years_). For example, in 2014, SECOORA conducted a broad stakeholder survey, the results of this survey helped inform SECOORA's funding priorities for inclusion on the 2016-2021 NOAA IOOS proposal. Links to the survey and survey results and a summary of the results are in the SECOORA certification package found at http://secoora.org/certification.**

      iii.   How the RICE collects and assesses user feedback to gauge the effectiveness of the regional system and subsystems in satisfying user needs, and how the RICE responds to this user feedback in setting its priorities. Sufficient documentation may be provided in the form of a description of the method the RICE uses in its annual planning process to assess priorities among the identified user needs in the region and to respond to those user needs; and

Yes ☑   No ☐   Pending ☐

Comments:
The description provided in the application meets the requirements.

      iv.   Steps the RICE takes to ensure decisions on priorities and overall regional system design are transparent and available. At a minimum, RICE priorities and regional system design decisions shall be made accessible for public viewing on the RICE's website.

Yes ☑   No ☐   Pending ☐

Comments:

The description provided in the application meets the requirements.

§997.22 Membership Policy

The RICE application shall describe:
(a) The process by which individuals or organizations may formally participate in the governance activities of the RICE;
(b) The rights and responsibilities of this participation;

Yes ☑   No ☐   Pending ☐

Comments:

The description provided in the application meets the requirements.

    (c) The process by which the RICE strives for organizational diversity through intra-regional geographic representation, and diversity of activities and interests from both public and private sectors; and

    (d) How the RICE allows for participation from adjacent regions or nations.

Yes ☐   No ☐   Pending ☐

Comments:

The description provided in the application meets the requirements.

§997.23 Strategic Operational Plan

    (b) Background and Context
        The Strategic Operational Plan shall contain a Background and Context section that describes:

        1) The role of the RICE in furthering the development of the regional component of the System;

Yes ☐   No ☐   Pending ☐

Comments:

The description provided in the application meets the requirements.

        2) The process by which the RICE updates the Strategic Operational Plan at least once every five years and how the RICE seeks inputs from the broader user community; and

Yes ☐   No ☐   Pending ☐

Comments:

The description provided in the application meets the requirements.

3) The RICE's primary partners and any contributing observing systems. For the purposes of § 997.23, NOAA defines a primary partner as any organization or individual that contributes significant staff time, funding or other resources to project activities. This is not an exhaustive list of all RICE partners but the primary partners the RICE is working with on a given project.

Yes ☐   No ☐   Pending ☐

Comments:

The description provided in the application meets the requirements.

(c) Goals and Objectives
   The Strategic Operational Plan shall contain a Goals and Objective section that describe:
      1) How the RICE addresses marine operations; coastal hazards; ecosystems, fisheries and water quality; and climate variability and change; and

Yes ☐   No ☐   Pending ☐

Comments:

The description provided in the application meets the requirements.

2) The major objectives that guide the RICE's priorities for data collection and management, development of products and services, research and development, and education and outreach.

Yes ☐   No ☐   Pending ☐

Comments:

The description provided in the application meets the requirements.

(d) Operational Plan for the Observing System
   The Strategic Operational Plan shall include or reference an Operational Plan for the Observing System that:
      1) Describes the desired outcomes of the observing system;

Yes ☐   No ☐   Pending ☐

Comments:

The description provided in the application meets the requirements.

2) Describes the elements of the operational integrated observing system that will deliver those outcomes;

<mark>Yes ☐</mark>   No ☐   Pending ☐

Comments:
The description provided in the application meets the requirements.

3) Documents to NOAA's satisfaction that the individual(s) responsible for RICE operations has the necessary qualifications and possesses relevant professional education and work experience to deliver observations successfully. At a minimum the Strategic Operational Plan shall:
   i. Identify the individual(s) responsible for overall RICE management;
   ii. Identify, as applicable, the individual(s) responsible for observations system management across the region;
   iii. Provide the curriculum vitae for each identified individual; and

Yes ☐   No ☐   <mark>Pending ☐</mark>

Comments:
The referenced documentation is not sufficient to meet the requirement.

The curriculum vitaes (CV) for each of the individuals responsible for observing systems management do include detailed education and work experience for each individual. However, the CVs for each individual do not clearly describe the roles and responsibilities of the individuals in the RICE. The CVs must document that the individual performs one of the two roles identified in §997.23(d)(3) and must successfully describe the role and responsibilities of the individual within the RICE organization.

We understand the situation SECOORA is in at this time with the tragic loss of Vembu. Please let us know if you would like to name a replacement individual or if either the Director or Business Manager will cover these duties?

SECOORA Response:
Overall RICE management is the responsibility of Debra Hernandez, SECOORA Executive Director. A revised CV for Ms. Hernandez is available on the SECOORA Certification website and at the following link: http://secoora.org/webfm_send/1799. Due the recent loss of the SECOORA RCOOS manager, Debra Hernandez is filling the role. SECOORA will advertise the RCOOS manager position after the May 16, 2017 Membership Meeting.

     iv. Identify the procedures used to evaluate the capability of the individual(s) identified in subsection 997.23(d)(3) to conduct the assigned duties responsibly; and

Yes ☑   No ☐   Pending ☐

Comments:
The description provided in the application meets the requirements.

    4) Describes how the RICE manages ongoing regional system operations and maintenance. At a minimum the Strategic Operational Plan shall:
        i. Describe the RICE's standard operating procedures for calibrating, validating, operating, and maintaining equipment owned and/or operated by the RICE regularly and in accordance with manufacturer guidance or industry best practice. Equipment is defined in §997.1; and

Yes ☑   No ☐   Pending ☐

Comments:

        ii. Describe the RICE's standard operating procedures for maintaining equipment inventories, shipping logs and instrument history logs for equipment owned and/or operated by the RICE.

Yes ☑   No ☐   Pending ☐

Comments:

  (e) Development of a Strategy to Sustain and Enhance the System
    The Strategic Operational Plan shall describe its strategy for balancing changes in regional priorities with the need to maintain established data sets, the primary value of which may be in their long-term records. At a minimum the description shall:
    1) Identify the guiding principles that inform the strategy;
    2) Reference and show connections to a long-term (five-to-ten-year) regional Build-out Plan for the full implementation of the regional observing system based on the RICE's priorities and identified user needs; and
    3) Relate the annual planning process the RICE uses to review its priorities in light of funding levels and its plans for system enhancement as outlined in the regional Build-out Plan.

Yes ☑   No ☐   Pending ☐

Comments:
The description provided in the application meets the requirements.

(f) Data Management and Communications (DMAC) Plan
    The Strategic Operational Plan shall include or reference a DMAC plan that:
       1) Documents to NOAA's satisfaction that the individual(s) responsible for management of data operations for the RICE has the necessary technical skills, and possesses relevant professional education and work experience to support DMAC capabilities and functionality for the System. At a minimum the DMAC Plan shall:
           i. Identify the individual(s) responsible for the coordination and management of observation data across the region; and
          ii. Provide the curriculum vitae for the identified individual(s).

Yes ☑   No ☐   Pending ☐
Comments:

Reviewer 1	Are there really only two people who do DMAC activities?
Reviewer 2	CVs make clear the deep expertise of the personnel.
Reviewer 3	*The two CVs demonstrate highly qualified personnel.*

          iii. Identify the procedures used to evaluate the capability of the individual(s) identified in subsection 997.23(f)(1) to conduct the assigned duties responsibly.

Yes ☐   No ☐   Pending ☐
Comments:

Reviewer 1	In the Data Management and Communication Services Request for Qualifications (RFQ) document -Page 2 point #3 references to NODC instead of NCEI. -This document is a specific request, does it apply to all evaluations? -How are SECOORA staff reviewed? SECOORA EMPLOYEE PERFORMANCE MANAGEMENT SYSTEM (http://secoora.org/webfm_send/1803)
Reviewer 2	Well stated

Reviewer 3	*SECOORA regularly reviews the contractor to ensure quality of services. The initial requirements for the support personnel are described in the RFQ.*

*SECOORA Response***: As was stated in 997.23(f)(1): SECOORA uses a contract process as the mechanism for managing DMAC services. The DMAC contract is administered by the SECOORA RCOOS Manager [but currently being administered by the Executive Director due to the recent loss of the RCOOS Manger] who is responsible for managing and prioritizing the SECOORA DMAC activities and working with the contract service provider. The current DMAC contract is with Axiom Data Science, LLC who provide DMAC services, infrastructure, and support for SECOORA as described in the [DMAC Plan](). The DMAC system structure is described on pages 4 - 6 and CVs for the key Axiom data management team members are in DMAC Plan [Appendix A]().**

Axiom Data Science, LLC is responsible for the coordination and management of the observation data from within the SECOORA region. As was noted in the original application, SECOORA manages DMAC services and data projects through annually renewed contracted services. The [RFQ]() for the DMAC contract outlines the services required by SECOORA and the qualifications required of the service provider. The RFQ also describes the review process for data management proposal submissions. The SECOORA Executive Director and RCOOS manager coordinate the review of proposals and a review team makes recommendations. The current contract is with Axiom Data Science, LLC. The [Scope of Work]() lists the services which the contractor must be able to provide and this is turn is used to evaluate the quality of work provided by the contractor. The June 2015-May 2016 Scope of Work and evaluation is provided.

Also of note, for Reviewer 1, the [RFQ]() for the DMAC contract was written in 2015. NODC was in the reorganization stages; therefore, the NCEI name was not listed in the RFQ. The RFQ listed NODC as that was the organization name at the time the RFQ was written. SECOORA did not feel it was wise to change the name in a historical document; however, in future documents, the name will reflect NCEI.

For Reviewer 1 reference, SECOORA Staff are reviewed annually. The template for the [performance evaluation]() employee job descriptions are available at [http://secoora.org/certificaion]().

2) Describes how data are ingested, managed and distributed, including a description of the flow of data through the RICE data assembly center from the source to the public dissemination/access mechanism. The description shall include any transformations or modifications of data along the data flow pathway including, but not limited to, format translations or aggregations of component data streams into an integrated product.

Yes ☑   No ☐   Pending ☐

Comments:

Reviewer 1	-Finding the Appendicies was difficult. Would have been nice to have them linked on http://secoora.org/certification. -Very well written! All of the major points concerning this question are addressed and satisfy the requirements.
Reviewer 2	Agree that finding the Appendicies was difficult. Would have been nice to have them linked on http://secoora.org/certification in the DMAC section. Otherwise, clearly described and excellent process.
Reviewer 3	*The SECOORA methods for getting data from the source to the public seems very robust and built on well-known mechanisms.*

SECOORA Response: **All of the DMAC Plan Appendices have now been individually listed at: http://secoora.org/certification. Scroll down to Section III.**

3) Describes the data quality control procedures that have been applied to data, not obtained through a federal data source, that are distributed by the RICE. All data shall be quality controlled and QARTOD procedures shall be employed for data with QARTOD manuals. For each data stream, describe the quality control procedure applied to the data, by the RICE or other named entity, between the data's collection and publication by the RICE. The description will also include a reference to the procedure used.

Yes ☐   No ☐   Pending ☐

Comments:

Reviewer 1	From Certification: -Sufficient response. From Referenced Documentation: -Data Management and Communications Plan 　　　-Pg. 15: QARTOD procedures will be implemented in phases to existing, applicable SECOORA assets by December 31, 2017. ← ☛ 　　　-Pg. 16: Currently, Real-time observations ingested by SECOORA DMAC system have a minimal SECOORA QC tests applied (syntax test, gross range test, time-gap check). No QC flags are associated with these data. This is worrisome. Why aren't QC flags associated? How did the QC tests get applied?

Reviewer 2	Agree with comments from other reviewers
Reviewer 3	*SECOORA relies mostly on the individual data provider to do QA as SECOORA does not collect raw data. I'd feel better if each data provider included their QA. SECOORA does check for valid ranges per QARTOD. SECOORA is starting to implement IOOS policies for QC. SECOORA defines QC and planned QC for various data streams.*

*SECOORA Response***: No quality flags are associated with our existing data offerings. SECOORA DMAC, as an entity, does not perform the quality checks and do not currently possess the ability to ingest the results of quality checks from our data streams and pass them through the DMAC system. The funded providers of data are performing quality checks on their side before SECOORA receives any data and the description of their quality control procedures are available in each individual Data Stream plan (DMAC Plan Appendix E). As outlined in the DMAC plan, it is SECOORA's intent to fully support quality control results by December of 2017. This will include ingesting the results of the provider supplied quality checks as well as running QARTOD on the data ourselves. This will be in addition to the existing gross-range and time-gap checks we currently perform.**

In summary, the funded data streams are quality controlled at the provider level before being submitted to SECOORA. SECOORA is developing the capability to accept those already performed quality checks by December 2017 and serve them along with the data throughout the SECOORA DMAC system.

4) Adheres to the NOAA Data Sharing Procedural Directive.[1] The System is an operational system, therefore the RICE should strive to provide as much data as possible, in real-time or near real-time, to support the operation of the System. When data are collected in part or in whole with funds distributed to a RICE through the U.S. IOOS Program Office, the RICE should strive to make the data available as soon as logistically feasible for each data stream. When data are not collected with funds distributed to a RICE through the U.S. IOOS Program Office, the data may be made available in accordance with any agreement made with the data provider.

Yes ☐   No ☐   Pending ☐

Comments:

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[1] NOAA Data Sharing Policy for Grants and Cooperative Agreements Procedural Directive, Version 2.0
https://www.nosc.noaa.gov/EDMC/documents/EDMC_PD-DSPNG_final_v2.pdf

Reviewer 1	• Certification
	    ○ Sufficient response.
	From Referenced Documentation:
	• Data Management and Communications Plan
	    ○ Pg. 17: Datasets are added to the searchable, public catalog after the data provider is contacted and any feedback (if given) is taken into account. What does "taken into account" mean? If they don't want SECOORA to release the data, what are the steps taken?
	        ▪ Occasionally, a data sharing agreement between SECOORA and a data provider will identify the existence of intellectual property rights (IPR) to the data and this is noted in the applicable Data Stream plan. However, IPRs do not restrict access to any of the data that is freely served through SECOORA data portal. IPR information is provided out of courtesy for the data provider, and it is an unwritten expectation that as with all data used by someone other than the originator. What does this agreement look like?
	        ○ What is feedback?
	• Summary:
	    ○ What are the details of data sharing agreements between SECOORA and a data provider? What do they cover? Is this legally binding? How is the feedback taken into account?

Reviewer 2	Excellent description.
Reviewer 3	*SECOORA has an operational data portal and the DMAC plan fully describes how data from various sources is managed and made available.*

*SECOORA Response***:**
Non-SECOORA PI data streams: Before data is ingested into SECOORA it is verified with the provider (e.g. local NGO, state agency such as Florida Fish and Wildlife Conservation) that they would like their data served and available through the SECOORA data portal. After the data has been ingested (on a scheduled basis if it is an ongoing feed), we assure that the data provider's metadata is complete and the SECOORA data catalog page correctly references the original data sources and shows any usage notes or citation and attribution information for the dataset. Only after the metadata is complete and the data provider is happy with how their data is presented do we add it to the SECOORA searchable catalog so it can be discovered by other people. We have modified the DMAC plan document to clarify this feedback loop with the data provider.

SECOORA PI data streams: There are no additional data sharing agreements between SECOORA and SECOORA funded data providers outside of the SECOORA subcontract. The subcontract requires the funded data provider to share their data with SECOORA in real-time or near real-time for display on the data portal and for archiving with NCEI.

5) Describes how the RICE will implement data management protocols promulgated by the IOOC and the U.S. IOOS Program Office in a reasonable and timely manner as defined for each protocol.

Yes ☑   No ☐   Pending ☐

Comments:

Reviewer 1	o Sufficient response.
Reviewer 2	Good response.
Reviewer 3	*SECOORA has plans in place and is implementing the plans.*

6) Documents the RICE's data archiving process or describes how the RICE intends to archive data at the National Centers for Environmental Information (NCEI) in a manner that follows guidelines outlined by that center. Documentation shall be in the form of a Submission Agreement, Submission Information Form (SIF) or other, similar data producer-archive agreement.

Yes ☐   No ☐   Pending ☐

Comments:

Reviewer 1	From Certification: • Sufficient response From Referenced Documentation: • Data Management and Communications Plan o Pg.17: The only assets that are not kept indefinitely in storage are webcam images, NEERS data (as it is strictly prohibited in their terms of service), and forecast products that have been replaced with a more accurate forecast. Just curious, whats up with NEERS? Why is it prohibited? NCEI archives NEERS through CDMO, but why is it prohibited to store their data? Summary • Very well written! All of the major points concerning this question are addressed and satisfy the requirements. • The only statements about HF Radar and Glider is on pg 16 "The NWS, NERRS, the IOOS HFR DAC, and the IOOS Glider DAC all ingest and perform extensive QC on the raw data collected by these platforms prior to making them available to the public."

	• The certification application should be explicitly stating that SECOORA is submitting to IOOS HFR DAC and IOOS Glider DAC for QC and archive. Please include this in the application.
Reviewer 2	Need to include updated agreement?
Reviewer 3	*An early draft of the archive agreement is included. The DMCA plan outlines the process for renegotiating an agreement with NCEI and reports some progress towards this. It also reports plans to have the archive agreement complete by the end of 2017.*

SECOORA Response: **This requested text has been added to the updated [SECOORA Certification Application](). The revised text states: SECOORA also submits to IOOS HFR DAC and IOOS Glider DAC for QC and archive. The SECOORA DMAC Plan also reflects this language.**

Reviewer 1 is interested in learning why SECOORA does indefinitely store NERRS data. NERRS has extensive data archives and updates their data to NCEI. It would be duplicative for SECOORA to do this when it is taken care of by the NERRS Centralized Data Management Office.

SECOORA's *Request to Archive* was approved by NCEI on 2017-02-16 and the Data Submission Agreement is in the process of being finalized. We have now included the [APPENDIX I – Request to Archive]() in the DMAC Plan.

   (g) Budget Plan
       The RICE's Strategic Operational Plan shall include or reference a Budget Plan that:
           1) Identifies who supports the RICE financially;
           2) Identifies how RICE priorities guide funding decisions; and
           3) Assesses funding constraints and the associated risks to the observing System that the RICE must address for the future.

Yes ☐   No ☐   Pending ☐

Comments:
The documentation is sufficient to meet the requirement.

§997.24 Gaps Identification

   (b) The RICE application shall
           1) Document that the RICE's asset inventory contains up-to-date information. This could be demonstrated by a database or portal accessible for public viewing and capable of producing a regional summary of observing capacity;

Yes ☐   No ☐   <mark>Pending ☐</mark>

Comments

Please provide a specific page/weblink/asset map where all the assets can be found and how this list/resource is updated.

SECOORA Response: **The application provided links to the information requested by the reviewer. The information is provided again here.**

SECOORAs assets, data, and maps are visible and accessible through the [SECOORA data portal](). Additionally, up-to-date [SECOORA asset maps]() for in situ and HR Radar are also available. SECOORA's DMAC plan outlines the data ingestion, management, and distribution (pgs 9-13) and public access to the data (pg 17). The SECOORA asset maps and the data portal are kept up to date by Axiom Data Science, LLC. If an in situ station or HFR are deployed or removed from service, corresponding map updates are made within one week.

     2) Provide a regional Build-out Plan that identifies the regional priorities for products and services, based on its understanding of regional needs, and a description of the integrated system (observations, modeling, data management, product development, outreach, and R&D). The RICE shall review and update the Build-out Plan at least once every five years; and

Yes ☐   <mark style="background-color:red">No ☐</mark>   Pending ☐

Comments:

While SECOORA has provided a regional Build-out plan there is not clear language specifying that it will be reviewed every five years.

SECOORA Response: **SECOORA completed the [10 Year Build-Out-Plan]() in 2011 and submitted the plan to the NOAA IOOS office. As SECOORA developed the 2016-2021 proposal, the 10 Year Build-Out-Plan and stakeholder surveys were consulted to assure that proposed efforts are consistent with identified regional needs. A comprehensive review/revision to the 10 Year Build-Out-Plan is currently underway. The new document will be titled the SECOORA RCOOS Plan. This new document will couple the Build-Out-Plan and RCOOS Plan. This document will identify the regional priorities for products and services, based on our understanding of regional needs, and a description of the integrated system (observations, modeling, data management, product development, outreach, and R&D). Maps with current assets as well as member and stakeholder identified "planned" assets will also be included. The maps will assist SECOORA with gap analysis. SECOORA will review and revise the RCOOS plan every five years, co-incident with the IOOS**

proposal process. The SECOORA RCOOS plan was on track for publication in May 2017; however, with the loss of the SECOORA RCOOS manager, this date has been moved back to October 2017. This will provide time for a new RCOOS manager to be hired and get involved with completion of the Plan.

3) Document the priority regional gaps in observation coverage needs, as determined by an analysis of the RICE asset inventory and Build-out Plan. The RICE shall review and update the analysis of priority regional gaps in observation coverage needs at least once every five years.

Yes ☐   No ☐   Pending ☐

Comments:

The language provided here in the application does not fully support the cert requirements of a specific gap analysis between the asset inventory in §997.24(b)(1) and the build-out plan in §997.24(b)(2). Please clarify the plans to support and answer this requirement.

Cert requirement language: The RICE shall provide sufficient documentation of a priority regional gaps analysis that compares information from the asset inventory in§997.24(b)(1) and the build-out plan in §997.24(b)(2) and describes the gaps between the two. A statement or description of how the gaps analysis will be reviewed and updated at least once every 5 years is also required.

SECOORA Response: **SECOORAs assets, data, and maps are visible and accessible through the SECOORA data portal. Additionally up-to-date SECOORA asset maps for in situ and HR Radar are also available. The revised RCOOS Plan, due October 2017, will include a gap analysis between currently deployed assets and member and stakeholder needed assets (i.e. assets that are needed but not deployed) that have been identified through surveys and needs assessments. This gap analysis will help SECOORA prioritize future asset funding. SECOORA will review and update this gap analysis as part of the RCOOS Plan updates every five years, co-incident with the IOOS proposal process. It should be noted that the HF Radar Gap Analysis is complete.**

§997.25 Financial Oversight

(b) The RICE's application shall document compliance with the terms and conditions set forth in 2 CFR Part 215 – Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-profit Organizations, Subpart C – Post Award Requirements. This Subpart prescribes standards for financial management systems, among others. (Compliance with this criterion can be demonstrated by referencing any existing grant, cooperative agreement, or contract the RICE has with NOAA.)

Yes ☐   No ☐   Pending ☐

Comments:
The documentation is sufficient to meet the requirement

(c) The RICE shall document annually the RICE's operating and maintenance costs for all observing platforms and sensors, etc., owned and/or operated by the RICE. This information shall be made available to NOAA upon request.

Yes ☐   No ☐   Pending ☐

Comments:
The documentation is sufficient to meet the requirement