



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D. C. 20503

**MEMORANDUM FOR GENERAL COUNSELS AND CHIEF INFORMATION OFFICERS
FOR EXECUTIVE DEPARTMENTS AND AGENCIES**

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SUBJECT: Prize Authority in the America COMPETES Reauthorization Act

On January 4, 2011, President Obama signed Public Law 111-358, the [America COMPETES Reauthorization Act](#). Section 105 of this Act added section 24 (Prize Competitions) to the Stevenson-Wydler Technology Innovation Act of 1980, to provide agencies with authority to conduct prize competitions in order to spur innovation, solve tough problems, and advance their core mission, as called for in the President's [Strategy for American Innovation](#) and the [2010 OMB "Guidance on the Use of Challenges and Prizes to Promote Open Government"](#) (OMB Memorandum M-10-11 of March 8, 2010).

As noted below, this new prize authority is designed to expand the authority of Federal agencies to conduct prize competitions to further their goals. It does not affect any existing prize authority already provided by any other law. Prize competitions under this new statute may be funded jointly by more than one agency and by the private sector, and may be judged by committees exempt from the requirements of the Federal Advisory Committee Act. The requirements under this new authority with respect to eligibility to win a prize, conduct the competition, liability, insurance, intellectual property rights, funding, and prize amounts are described below.

To permit the Office of Science and Technology Policy (OSTP) to file the required annual reports to Congress, agencies conducting prize competitions under this new authority should complete the attached report to OSTP by December 30 each year. Agencies are also encouraged to include in such reports information about prize competitions conducted under other authority. There is no need to report if an agency has not conducted any prize competitions during the course of the year.

The following Fact Sheet and Frequently Asked Questions were developed jointly by policy and legal staff in the Office of Science and Technology Policy (OSTP) and the Office of Management and Budget (OMB) to provide informal guidance to agencies in their implementation of the prize authority in section 24 of the Stevenson-Wydler Act, as added by the America COMPETES Reauthorization Act.

FACT SHEET

New section 24 of the Stevenson-Wydler Technology Innovation Act of 1980, 15 U.S.C. § 3719, as enacted by the America COMPETES Reauthorization Act, includes the following authorities and requirements.

Authorities

- **In General.** Section 24 permits any agency head to “carry out a program to award prizes competitively to stimulate innovation that has the potential to advance the mission of the respective

agency” (§ 24(b)). Section 24 authorizes agencies to use both Federal appropriated funds and funds provided by the private sector in order to design prizes, administer prizes, and offer monetary awards for prize competitions (§ 24(m)(1)).

- **Type.** Section 24 gives agencies flexibility in selecting the prize type best able to accomplish the goal. Specifically, the Act authorizes agencies to conduct a point solution prize, exposition prize, participation prize, or “[s]uch other type[s] of prizes as each head of an agency considers appropriate to stimulate innovation that has the potential to advance the mission of the respective agency” (§ 24(c)(1)–(4)).
- **Federal Funding and Size.** Section 24 does not itself provide any “budget authority” or Federal appropriation for the funding of a prize. With respect to authorization for prize competitions of otherwise appropriate funds to an agency, section 24(m)(4) states that:
 - “No prize competition under this section may result in the award of more than \$1,000,000 in cash prizes without the approval of the head of an agency.”
 - “No prize competition under this section may offer a prize in an amount greater than \$50,000,000 unless 30 days have elapsed after written notice has been transmitted to the Committee on Commerce, Science, and Transportation of the Senate and the Committee on Science and Technology of the House of Representatives.”
- **Cross-Agency Collaboration.** Section 24 authorizes “the heads of multiple agencies in cooperation” to conduct prize competitions that advance shared goals (§ 24(b)). Section 24 also authorizes agencies to “accept funds from other Federal agencies to support [prize] competitions” (§ 24(m)(1)).
- **Multi-Sector Partnerships.** Section 24 authorizes agencies to “enter into an agreement with a private, nonprofit entity to administer a prize competition” (§ 24(j)). In addition, financial support for the prize design, administration, and monetary award may consist of not only Federally appropriated funds but also “funds provided by the private sector for such cash prizes” (§ 24(m)(1)).
- **External Expertise.** Section 24 authorizes agencies to tap external expertise throughout the lifecycle of the prize. Agencies may (1) empanel advisory committees to recommend topics for prize competitions (§ 24(d)), and (2) appoint judges from the private sector (§ 24(k)(1)). Section 24(k)(4) exempts from the Federal Advisory Committee Act (FACA) “any committee, board, commission, panel, task force, or similar entity created solely for the purpose of judging prize competitions under this section.” In addition, the Act encourages agencies to seek technical assistance from the marketplace in structuring and conducting prize competitions. See § 24(n) (requiring the General Services Administration to “develop a contract vehicle to provide agencies access to relevant products and services, including technical assistance”).

Requirements

Section 24 includes the following requirements for agencies conducting prize competitions.

- **Topic Selection.** “[C]onsult widely both within and outside the Federal Government” when selecting topics for prize competitions (§ 24(d)).

- **Advertising.** “[W]idely advertise each prize competition to encourage broad participation” (§ 24(e)). The head of an agency must publish a notice in the Federal Register announcing the competition and setting out the rules, including eligibility, prize amount, process, and criteria (§ 24(f)).
- **Fairness and Transparency.** “[D]evelop guidelines to ensure that the judges...are fairly balanced and operate in a transparent manner” (§ 24(k)(3)). In addition, agencies are prohibited from appointing any judge who has (1) personal or financial interests in, or is an employee, officer, director, or agent of any entity that is a registered participant in a competition, or (2) a familial or financial relationship with an individual who is a registered participant (§ 24(k)(2)(A) and (B)).
- **Funding.** Before announcing the prize, ensure that funds for the prize are either (1) appropriated, or (2) committed in writing by a private source (§ 24(m)(3)(A)).

In addition, section 24(m)(3)(B) provides that the head of an agency “may increase the amount of a prize after an initial announcement is made under subsection (f) only if—

“(i) notice of the increase is provided in the same manner as the initial notice of the prize; and

“(ii) the funds needed to pay out the announced amount of the increase have been appropriated or committed in writing by a private source.”

- **Intellectual Property.** Take no interest in the intellectual property submitted to a prize competition without the written consent of the submitting participant (§ 24(j)(1)).
- **Eligibility.** Limit eligibility to win a prize to entities/individuals that:
 1. have agreed to the rules of the competition (§ 24(g)(1));
 2. are either (a) in the case of an entity, incorporated in and maintain a primary place of business in the United States, or (b) in the case of an individual, a citizen or permanent resident of the United States (§ 24(g)(3));
 3. are *not* a Federal entity or Federal employee acting within the scope of employment (§ 24(g)(4));
 4. assume risks and waive claims against the Federal government and its related entities (§ 24(i)(1)(B));

and

 5. obtain liability insurance or demonstrate financial responsibility, in amounts determined by the head of an agency, for claims by third parties and the Federal government (§ 24(i)(2)).

In addition, section 24(h) provides that:

“An individual or entity shall not be deemed ineligible under subsection (g) because the individual or entity used Federal facilities or consulted with Federal employees during a

competition if the facilities and employees are made available to all individuals and entities participating in the competition on an equitable basis.”

Annual Report

Section 24 requires the OSTP to submit to Congress by March 1 of each year a report on the prize competitions conducted under section 24 during the preceding fiscal year. To meet the March 1 deadline, all Federal agencies should report to OSTP, no later than December 30 of each year, regarding the agency’s activities during the fiscal year that ended on the preceding September 30. *Thus, each agency should submit its first report to OSTP by December 30, 2011, regarding the agency’s prize activities during fiscal year 2011. Please see Appendix I for more detail on the format in which agencies should submit their report.*

FREQUENTLY ASKED QUESTIONS

1. **Does the new § 24 of the Stevenson-Wydler Technology Innovation Act of 1980, as enacted by § 105 of the America COMPETES Reauthorization Act, apply to my agency?**

Section 24 applies to all “Federal agenc[ies]” as defined by the Stevenson-Wydler Technology Innovation Act of 1980, with the exception of agencies in the legislative branch. Stevenson-Wydler defines “Federal agency” broadly to include any “Executive agency” as defined in 5 U.S.C. § 105, as well as any military departments as defined in 5 U.S.C. § 102. In turn, section 105 of Title 5 defines “Executive agency” broadly to include not only Executive departments, but also “Government corporation[s],” as defined in 5 U.S.C. § 103, and “independent establishment[s],” a catchall term defined to cover most other entities in the Executive Branch (other than the United States Postal Service or the Postal Regulatory Commission), as defined in 5 U.S.C. § 104.

2. **May the head of the agency delegate the prize authority in § 24, as well as the authority of the agency head to approve a prize competition that may result in the award of more than \$1 million?**

Section 24 does not restrict an agency head from delegating the agency head’s authorities under this section, in accordance with the agency’s organic statute, other laws, and applicable regulations.

3. **Can my agency continue to conduct prize competitions under other authorities, including the authorities identified in the [OMB Memo M-10-11](#) and approved by my agency’s General Counsel (e.g. Procurement Authority, “Other Transactions” Authority, etc.)?**

Yes. Section 24(o)(2) states, “Nothing in this section affects the prize authority authorized by any other provision of law.”

4. **Must my agency obtain specific appropriations for the express purpose of conducting a prize competition in order to use this new prize authority under § 24?**

No. An agency may rely on the new section 24 to conduct a prize competition using “Federal appropriated funds,” and section 24 does not require that the appropriations statute in question specifically provide funding for the express purpose of conducting a prize competition. See § 24(m)(1). As indicated by the Congressional reporting requirements in the Act, agencies should consider prize competitions as one of many options for executing their goals. See § 24(p)(2)(B) (requiring for each prize competition an analysis of why a prize competition was the “preferable method of achieving the goals . . . as opposed to other authorities available to the agency, such as contracts, grants and cooperative agreements”).

When an agency evaluates whether the agency can use an appropriation for the purpose of conducting a prize competition (in the case of an appropriation that does not expressly address prize competitions), the agency must determine whether the use of those appropriated funds for a prize competition lies within the scope of the objects of that appropriation. Prior to the enactment of section 24, OMB issued [guidance \(M-10-11\)](#) outlining the general principle that an agency has reasonable discretion under the “necessary expense” doctrine to determine how the agency will carry out the objects of an appropriation. There is now a broad scope for prizes under the new section 24, which authorizes agencies to conduct prize competitions that will “stimulate innovation that has the potential to advance the mission of the . . . agency” (§ 24(b)). Section 24 thus provides a legal basis under which an agency may use its appropriated funds that are available (expressly or implicitly) in order to conduct a prize competition that meets this standard and is not otherwise prohibited (or funded by another appropriation). Agencies should consult with their general

counsels, and where necessary with OMB, about this issue, which would depend on the specific design of the prize and the language of the agency's appropriations statute.

5. Can my agency use one-year, multi-year, or no-year funds to conduct a prize competition (in the situation in which my agency does not have an express appropriation for prize competitions to be conducted under § 24)?

An agency's ability to use appropriated funds for conducting a prize competition is not limited to appropriations that have a particular period of availability. Thus, an agency can use one-year funds, multi-year funds, or no-year funds to conduct a prize competition (so long as the appropriation is available for that purpose). However, as Section 24(m)(2) makes clear, an agency must comply with the Antideficiency Act when obligating and expending funds: "No provision in this section permits obligation or payment of funds in violation of section 1341 of title 31, United States Code." Moreover, depending on the length of the time period during which a prize may be awarded, after the prize competition has been announced, an agency may need to rely on a multi-year or no-year appropriation in order to ensure that the amounts that the agency has obligated for the prize (at the time the prize competition is announced) will continue to be available for expenditure during the period in which the prize can be awarded. See 31 U.S.C. § 1552 (providing for the cancellation of obligated balances on September 30 of the fifth fiscal year after the period of availability has ended).

6. In the case of an appropriations act that includes an express appropriation for a prize competition to be conducted under § 24, will those funds be no-year funds (i.e., remain available for obligation until expended) by virtue of § 24(m)(2)?

Section 24(m)(2) provides that: "Notwithstanding any other provision of law, funds appropriated for prize awards under this section shall remain available until expended." Since Congress in a later-enacted appropriation could specify a different period of availability for such appropriated funds, agencies should consult with their general counsels, and where necessary with OMB, about this issue, which would depend on the language of the applicable appropriations statute.

7. Must my agency have separate gift authority to conduct a prize competition supported by private sector funds?

No. Section 24(m) grants agencies authority to accept and use private-sector funds for the design, administration, or prize purse of a competition conducted under section 24, regardless of whether the agency has pre-existing statutory authority to accept donations or gifts. In considering private sector support for a prize competition, agencies must review all applicable ethics and conflict-of-interest rules, and agencies must comply with the prohibition in section 24 against "giv[ing] any special consideration to any private sector entity in return for a donation."

Note that although section 24(m)(3) permits an agency to announce a prize competition when "all the funds needed to pay out the announced amount of the prize have been appropriated or committed in writing by a private source," section 24 provides no exception to the general rule that an agency may not incur an obligation until such time as the agency has actually received the funds (i.e., the written commitment does not provide "budget authority" against which an agency may incur a legal obligation and record a budgetary obligation). Moreover, section 24(m)(2) makes clear that the section does not waive the application of the Antideficiency Act ("No provision in this section permits obligation or payment of funds in violation of section 1341 of title 31, United States Code."). Thus, in those cases where an agency is announcing a prize competition, but the agency has not yet received the private funds for which a written commitment has

been provided, the agency must make clear in announcing the prize competition that the agency's (and the Federal Government's) legal obligation extends only to the payment of any Federal share of the prize, and that the private source is therefore liable for the payment of its share of the prize.

8. Must my agency have cooperative agreement authority to enter into an agreement with a private nonprofit entity to administer a prize competition under § 24(l)?

No. Section 24(l) grants agencies authority to enter into an agreement with a private nonprofit entity to administer a prize competition under section 24, regardless of whether the agency has pre-existing statutory authority to enter into such agreements.

In considering potential agreements with private nonprofit entities for the purpose of a prize competition, agencies should review all applicable ethics and conflict-of-interest rules.

9. Section 24(n) requires GSA to develop a contract vehicle for assisting agencies in conducting prize competitions and authorizes agencies to enter into agreements with non-profit entities for the administration of prize competitions. In addition to these approaches, does my agency also have the authority to contract directly with for-profit companies to acquire products and services to help the agency identify, design, and administer prize competitions under § 24?

Yes. Section 24 specifically directs the General Services Administration to “develop a contract vehicle to provide agencies access to relevant products and services, including technical assistance in structuring and conducting prize competitions to take maximum benefit of the marketplace as they identify and pursue prize competitions to further the policy objectives of the Federal Government” (§ 24(n)). Section 24(l) expands agency authority to enter into agreements with non-profit entities for the purpose of administering a prize competition (see question 8 above), which some agencies previously did not have, but does not restrict an agency from using pre-existing contract, grant, cooperative agreement, or other authorities to acquire products, services, or technical assistance from for-profit entities that will help the agency identify, design, and administer prize competitions under the Act. GSA efforts to develop a government-wide contract vehicle should make it faster and easier for agencies to procure prize-related products and services – and agencies are encouraged to consider using this vehicle to avoid unnecessary duplication of effort – but they are not prevented from using their own contracts and existing processes to do so. Any such use of pre-existing authorities in support of a prize competition under the Act must comply with all applicable law. For example, all contracts must comply with applicable regulations under the Federal Acquisition Regulations System (48 C.F.R. Chapter 1) and may not be used to perform inherently governmental functions. In this analysis, agencies should also note that section 24(k) provides that individuals from the private sector may participate as judges for a prize competition.

10. Does § 24 authorize agencies to accept funds from, or provide funds to, another agency?

Yes. Section 24(b) specifically authorizes the heads of “multiple agencies in cooperation” to carry out a prize program when it “has the potential to advance the mission of the respective agenc[ies].” Section 24(m)(1) authorizes the head of an agency to “accept funds from other Federal agencies to support” such prize competitions. Read together, these provisions provide authority to accept funds from, or provide funds to, another agency to support a cooperative prize competition with the potential to advance the mission of both agencies. Transactions between agencies under section 24(m) will not change the purpose or availability of the funds received. Agencies considering a joint prize competition must ensure that the prize competition falls within the scope of each agency's appropriation and is otherwise consistent with each applicable appropriations statute and other applicable law.

11. To what extent must participants demonstrate financial responsibility for all prize competitions conducted under § 24?

Section 24(i)(2) requires participants to “obtain liability insurance or demonstrate financial responsibility, *in amounts determined by the head of an agency, for claims by* (A) a third party for death, bodily injury, or property damage, or loss resulting from an activity carried out in connection with participation in a competition ...; and (B) the Federal Government for damage or loss to Government property resulting from such an activity” (§ 24(i)(2) (emphasis added)).

Section 24(i)(2) thus gives the head of an agency flexibility to distinguish between prize competitions that pose substantially different levels of risk to third parties and the Federal Government (e.g., between a competition challenging participants to launch a rocket into space and a competition challenging students to build software applications). Consequently, in establishing liability insurance amounts or otherwise establishing requirements for financial responsibility, the agency may take into account the amount of risk involved. While there may be scenarios in which a minimal amount of risk would justify a determination that a demonstration of *de minimis* financial responsibility is sufficient, the evaluation must be made based on an assessment of the facts of each specific case.

Agencies should consult with their general counsels, and where necessary with OMB and the Department of Justice, about the implementation of this requirement for participants to “obtain liability insurance or demonstrate financial responsibility.”

12. Are non-U.S. individuals or entities eligible to win prizes in prize competitions conducted under § 24?

Section 24(g)(3) limits individual eligibility to U.S. citizens or permanent residents (regardless of whether participating singly or in a group) and limits eligibility for private entities to those that are (1) incorporated in the United States, and (2) maintain a primary place of business in the United States.

Keep in mind that individuals who are not U.S. Citizens or permanent residents might be eligible to win prizes in prize competitions conducted under other legal authorities (see question 3 above).

13. Can agencies conduct internal prize competitions under the prize authority in § 24?

Section 24(g)(4) states that Federal employees “acting within the scope of their employment” are not eligible to win a prize under section 24.

Agency personnel, however, may compete for prize competitions conducted under section 24 if the employees participate in the competition on their own time and outside the scope of their employment. In such situations, the agency personnel would be subject to the “equitable basis” restriction in section 24(h):

“An individual or entity shall not be deemed ineligible under subsection (g) because the individual or entity used Federal facilities or consulted with Federal employees during a competition if the facilities and employees are made available to all individuals and entities participating in the competition on an equitable basis.”

We recommend that agencies provide appropriate guidance for their employees who might wish to participate, as an outside activity, in a competition under section 24.

14. How should an agency make the payment to the winner of a prize competition?

Section 24 neither directs nor restricts the mechanism by which an agency transfers a cash prize to an eligible winner. Various options may be available, and agencies should consult their Comptroller or Chief Financial Officer, as well as their General Counsel. The following DARPA and NASA case studies are provided to illustrate two potential options:

In past prize competitions, DARPA paid the winner through a single electronic funds transfer. The money was obligated in the accounting system and the Comptroller sent Standard Form 1034 to the Defense Finance and Accounting Service, which executed the transfer of funds to the winner's bank account.

NASA typically transfers competition funds through a contractor or grantee. In most cases, the contractor or grantee also conducts the competition and the requirement to transfer funds to the solvers/winners was part of the award to the contractor/grantee. That contractor charges NASA a handling fee to make the transfer to the winner.

In processing prize transactions, agencies must provide for the issuance of the required IRS documentation (Form 1099).

15. Is a particular approach to intellectual property issues required by § 24 of the America COMPETES Act?

No. Each agency should determine whether or not to seek an ownership interest or license in intellectual property developed by a participant in a prize competition, and should do so based on a careful analysis of the goals of the prize competition, an analysis of the full set of incentives for potential participants in light of any agreement about sharing intellectual property rights, and a theory of how solutions will be implemented after the prize is awarded.

In so doing, agencies should note that Section 24 prohibits agencies from gaining an interest in intellectual property developed by a participant in a competition *without the written consent* of the participant (§ 24(j)(1)). Agencies should clearly articulate, in prize competition rules, how the intellectual property will be treated, and agencies should require all participants to provide written consent to the rules when or before submitting an entry, as a condition of their eligibility to participate in the competition. Agencies choosing to use an electronic signature to fulfill the requirement of § 24(j)(1) should comply with all applicable statutes, including the Electronic Signatures in Global and National Commerce Act (15 U.S.C. § 7001 *et seq.*) and the procedures prescribed by OMB under the Government Paperwork Elimination Act, http://www.whitehouse.gov/omb/fedreg_gpea2/.

Notably, the Act specifically permits agencies to “negotiate a license for the use of intellectual property developed by a participant for a competition” (§ 24(j)(2)).

16. What reporting obligations will an agency incur through use of the prize authority in § 24?

Section 24(p)(1) requires the Director of the OSTP to submit to Congress a report on the activities carried out under Section 24 during the preceding fiscal year no later than March 1 of each year. To meet the March 1 deadline, all Federal agencies should report to OSTP on the activities carried out during Fiscal Year 2011 under section 24 no later than December 30, 2011. Please see Appendix I for more detail on the format in which agencies should submit their report.

- 17. Section 24(n) calls on the General Service Administration to (1) “provide government wide services to share best practices and assist agencies in developing guidelines for issuing prize competitions,” and (2) “develop a contract vehicle to provide agencies access to relevant products and services.” May agencies conduct prize competitions under the Act prior to GSA completion of these tasks?**

Yes. GSA efforts under section 24(n) should ultimately make it easier for agencies to design and conduct prize competitions under the Act, but should not prevent agencies from doing so on their own.

- 18. Whom should my General Counsel contact with questions about § 24?**

Agencies should send an email to OSTP (prizes@ostp.gov) and OMB’s Office of General Counsel (ogc@omb.eop.gov).

Appendix I: Format for Report to Congress

By no later than December 30, 2011, and using the format below, please report to OSTP all activities your agency carried out during fiscal year 2011 under Section 24 of the Stevenson-Wydler Technology Innovation Act of 1980.

SUBMISSION DETAILS

- **Submit by email to:** prizes@ostp.gov **by:** COB December 30, 2011
- **Requirements:** Section 24(p) of the Stevenson-Wydler Act requires a report on all prize competitions conducted under Section 2. Agencies should use the template below to report to OSTP all activities under section 24. Agencies are also encouraged to report to OSTP on prize competitions conducted under other legal authorities, including why the competition was conducted under that authority.
- **Clearance:** In your submission, please confirm that appropriate agency leadership has approved the report.

REPORT TEMPLATE (TO BE COMPLETED SEPARATELY FOR EACH PRIZE COMPETITION OR CHALLENGE)

1. **Title** of prize competition or challenge
2. **Sponsoring Agency**
3. **Primary point of contact** for the prize competition
4. **Tagline** of 350 words or less. Similar to the first line of a newspaper story, the tagline should clearly explain what the prize competition is, who the prize challenged, what it challenged them to do, and why it is important or unique.
5. **Link** to the homepage for the prize competition (e.g., on Challenge.gov)
6. **Problem Statement.** Explain the problem the prize competition solves.
7. **Proposed Goals.** What were the primary objectives of the prize competition?
8. **Why a Prize.** Provide an analysis of why a prize competition was the preferable method of achieving the goals described in #7 as opposed to other authorities available to the agency, such as contracts, grants, and cooperative agreements.
9. **Participants.** Whom did the agency hope to mobilize to compete?
10. **Solicitation & Outreach.** What methods did the agency use to market the prize competition, mobilize potential participants, and ensure high quality submissions? Were those methods effective? Did the agency learn any lessons about outreach that might be valuable for future prize competitions?
11. **Incentives.** What incentives did the agency provide for participants to compete in the prize competition (monetary and non-monetary)? What is the total amount of cash prizes awarded for the prize competition, including a description of the amount of any private funds contributed in the program and the sources of those private funds, and the manner in which the amounts of cash prizes awarded and claimed were allocated among the accounts of the agency for recording as obligations and expenditures (i.e., what amount(s) were obligated to what appropriations account(s))?
12. **Evaluation.** What methods did the agency use to evaluate submissions to the prize competition? Were those methods effective? Did the agency learn any lessons about evaluation that might be valuable for future prize competitions?
13. **Partnerships.** What partnerships did your agency form (formal or informal) with other agencies or private sector entities to make successful a prize competition conducted under section 24? What were the benefits derived from those partnerships? Did the agency learn any lessons about public private partnerships that might be valuable for future prize competitions?
14. **Resources.** Which agency resources, including personnel and funding, did the agency use in the execution of each prize competition? Please provide a detailed description of the activities for which those resources were used and an accounting of how funding for execution was allocated among the accounts of the agency for recording as obligations and expenditures (i.e., amounts in personnel and other administrative expenses associated with the prize competition that were obligated and spent under each relevant appropriations account) .

15. Results. Please explain how the prize competition advanced the mission of the agency and the specific objectives identified in #7.