

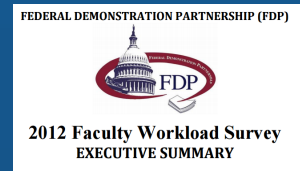


FEDERAL DEMONSTRATION PARTNERSHIP

Redefining the Government & University Research Partnership

2012 FDP Faculty Workload Study and the National Dialogue

(Examining the Intersections)



Jim Luther, Duke University

Sara Bible, Stanford University

Sandra Schneider, University of South Florida

January 11, 2016



Agenda – “Next Steps in Addressing Administrative Burden”

- Summary
 - 2012 Faculty Workload Study
 - National Dialogue
- Examine the intersections
- Next Steps
 - Collaborate to resolve issues
 - Planned Topic for Future FDP Meetings
 - University specific observations



Examine the Intersections



[Home](#) [How to Participate](#) [About Us](#) [DATA Act Resources](#)

National Dialogue: Improving Federal Procurement and Grants Procurement

National Dialogue and Pilot to reduce reporting compliance costs for Federal contractors and grantees.
Click here to get started:

[REPORTING AND DATA ACT DIALOGUE](#)

Joint Opportunities
and Commonalities

FEDERAL DEMONSTRATION PARTNERSHIP (FDP)

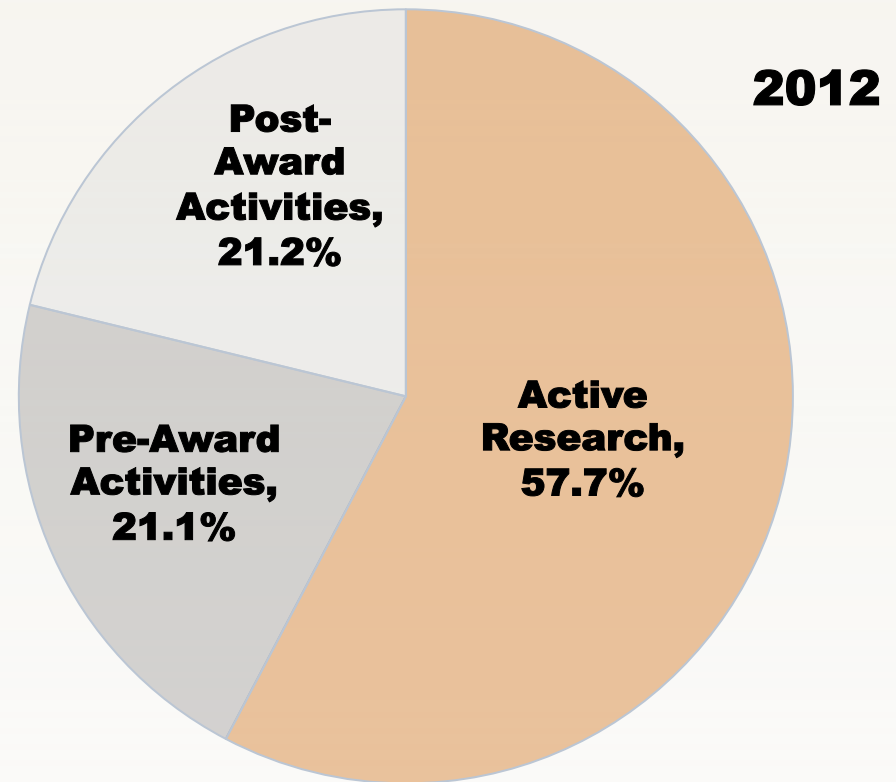


2012 Faculty Workload Survey EXECUTIVE SUMMARY



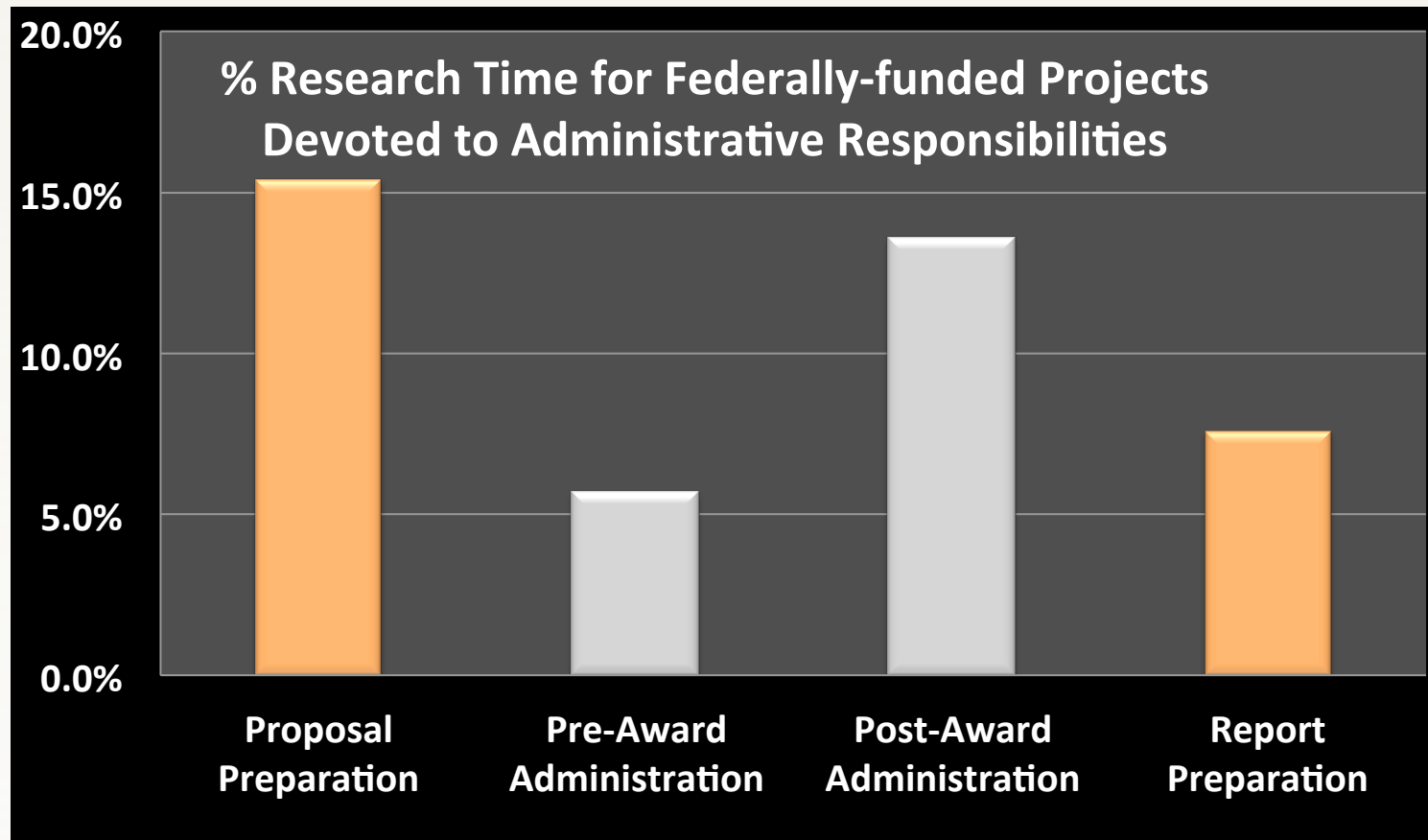
Overview of FWS Finding

Just as in 2005, researchers in 2012 reported that 42% of their research time devoted to federally-funded projects is spent completing administrative and related requirements, rather than conducting active research.





Time on Proposals and Reports



Proposal and Report Preparation takes up almost one quarter of the average PI's federal research time.



Burden of Proposal Preparation

Over **400 comments** identifying **proposal preparation** as the single most frustrating administrative responsibility:

- Constantly changing requirements, formats and content
- Wasted time filling out numerous documents when the vast majority of proposals will not be funded
- Detailed budgets despite low likelihood of funding
- Different requirements from different agencies; different forms (CVs, budgets, etc.)
- Increasing requirements with decreasing funding rates
- Emphasis within proposal on procedure and data that are not directly relevant to the research



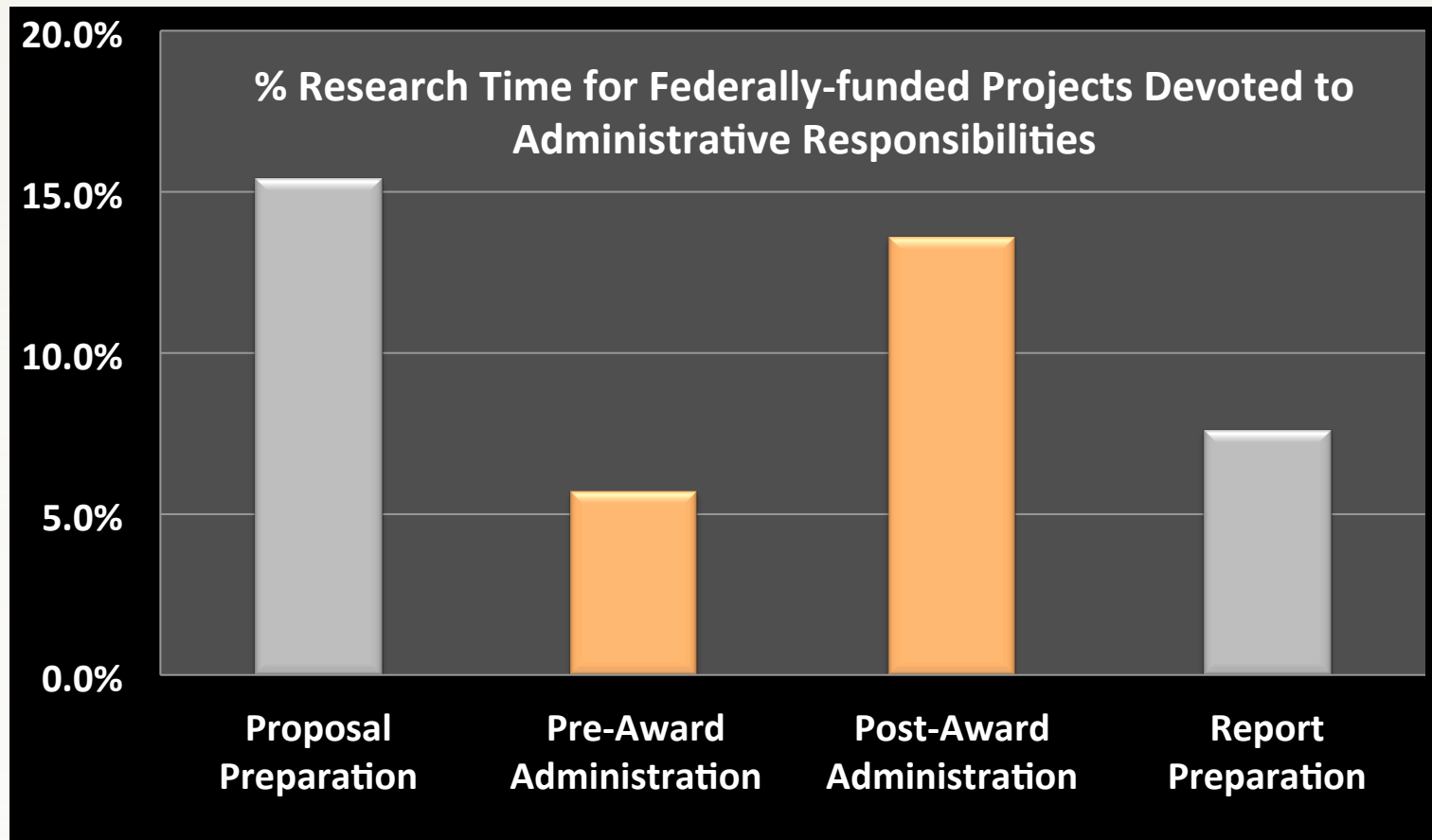
Burden of Report Preparation

Over **600 comments** identifying **report preparation** as the single most frustrating administrative responsibility:

- Constantly changing requirements, formats, and content
- Routine, redundant, detailed interim reports that no one reads
- Different requirements from different agencies; complex forms
- Requirements are too frequent and overly detailed; tedious
- Ambiguities in requirements; poor fit of forms to actual research
- Online submission is “user unfriendly”

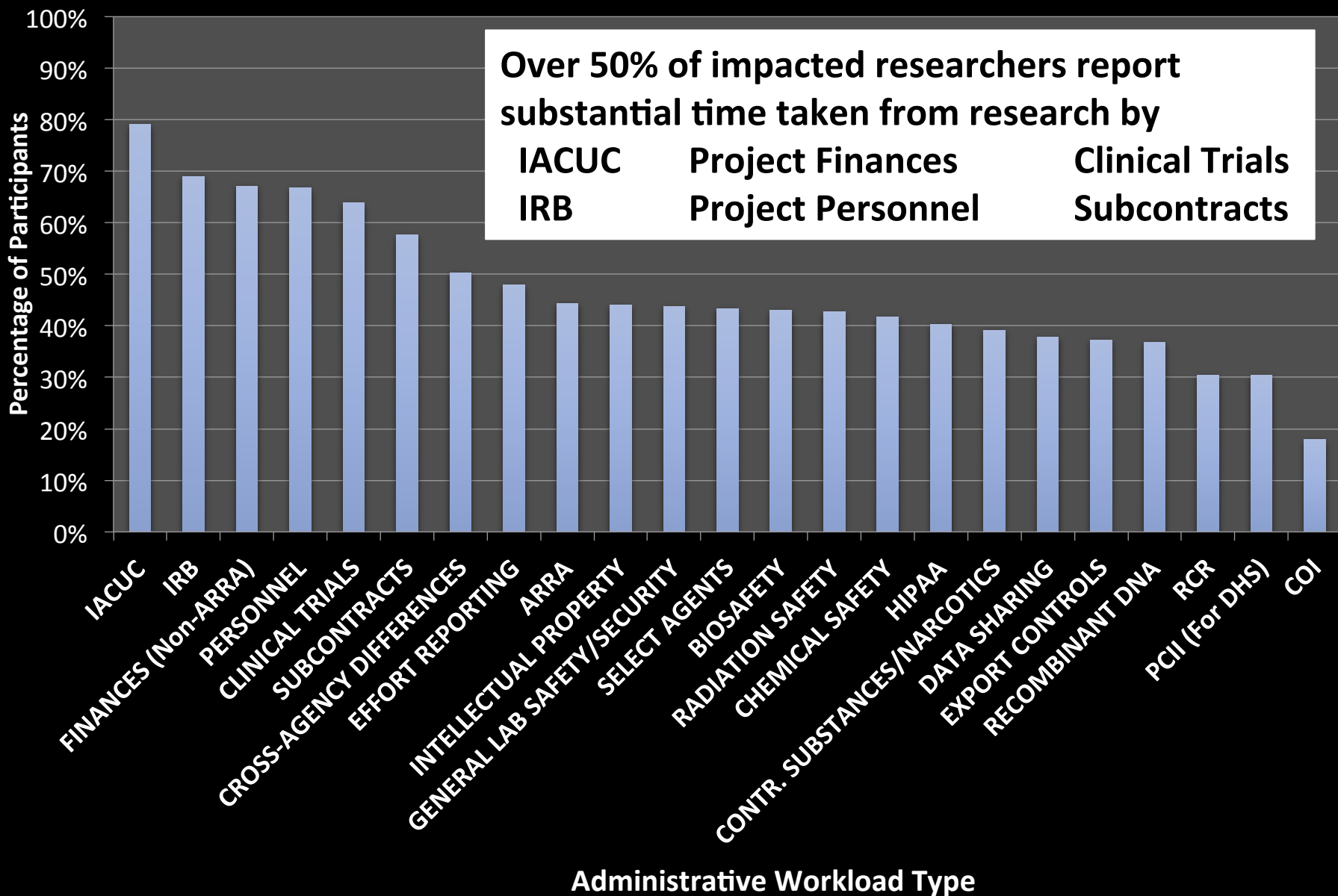


Pre-Award and Post-Award Time



Pre-Award and Post-Award Administration takes up almost one fifth of the average PI's federal research time.

% Reporting Substantial Time Taken by Administrative Responsibilities





Specific Issues or “Drilldowns”

<i>2012 Burden Drill-Down (Initial N=12816)</i>	<i>Mean</i>
FINANCES--Non-ARRA (N=7531)	
Managing budget-to-actual expenses	3.09
Dealing with equipment and supplies purchases	2.89
Determining and justifying which tasks and related costs are allowable as direct charges	2.34
Meeting other fed. cost accounting standards (incl. budget transfers, spending	2.09
Completing training regarding budgets/expenditures on federal projects	1.74
Requesting meeting and tracking federally-mandated cost-share requirements	1.71
PERSONNEL (N=7240)	
Managing personnel	3.55
Hiring personnel	2.99
Evaluating personnel	2.95
Dealing with issues related to visas	1.89
EFFORT REPORTING (N=5041)	
Completing federal time and effort reports for myself	2.66
Completing federal time and effort reports for others	2.37
Completing training regarding time and effort reporting on federal projects	2.08



Specific Issues or “Drilldowns”

<i>2012 Burden Drill-Down (continued)</i>	<i>Mean</i>
IACUC (N=2513)	
Preparing IACUC protocols for initial review	3.62
Completing annual IACUC reviews and three-year re-writes of protocols	3.38
Completing protocol revisions requested by reviewers	3.29
Fulfilling federal requirements for training in animal care and use	2.75
Satisfying federal requirements for funded projects (e.g. tracking animal numbers)	2.63
Maintaining veterinary medical records	2.25
IRB/Human Subjects Protections (N = 3897)	Mean
Preparing IRB protocols and consent forms for initial review	3.50
Completing protocol revisions requested by reviewers	3.04
Waiting for feedback from review	3.00
Completing annual continuing review of protocols	2.92
Ensuring that study procedures meet protocols	2.87
Fulfilling federal requirements for training in human subjects protections	2.64



Themes for a FWS “Wish List”

Improve Aspects of System for Funding Research

Find ways to:

- **Improve funding opportunities**
- **Improve proposal success rates**
- **Focus on goal of research innovation and productivity**
- **Consider cost/benefit of research policies/practices**
- **Reduce disincentives for research positions/careers**



Themes for a FWS “Wish List”

Promote a Healthy Research Culture

Work to ensure that audit/legal/CYA concerns do not override goal to support research and researchers

- **Avoid fear as primary motivator**
- **Foster trust and collaboration in relationships**
- **Focus protective policies/practices on high risk situations and high likelihood problems**
- **Define and apply criteria for “materiality”**
- **Emphasize competence and knowledge**
- **Keep sight of the value of the research**



Themes for a FWS “Wish List”

Address Pervasive Problems w/ Admin. Workload

Prioritize based on cost/benefit

→ avoid waste of valuable research time

Efficiency checklist?

- **Minimize changes (and need for re-training)**
- **Respond to scale -> less work for minor issues**
- **Simplify**
- **Coordinate/unify**
- **Reduce delays**
- **Eliminate redundancy**
- **Strive for clarity; look for ways to disambiguate**



Examine the Intersections



[Home](#) [How to Participate](#) [About Us](#) [DATA Act Resources](#)

National Dialogue: Improving Federal Procurement and Grants Procurement

National Dialogue and Pilot to reduce reporting compliance costs for Federal contractors and grantees.
Click here to get started:

[REPORTING AND DATA ACT DIALOGUE](#)

Joint Opportunities
and Commonalities

FEDERAL DEMONSTRATION PARTNERSHIP (FDP)



2012 Faculty Workload Survey EXECUTIVE SUMMARY



The National Dialogue

- Created in response to the Digital Accountability and Transparency Act (DATA) of 2014.
- Joint initiative: Chief Acquisition Officers Council, the DHHS, and the General Services Administration
- Discuss ideas on how to reduce the costs (compliance and other) associated with reporting compliance under Federal awards
- Part of an effort to improve the economy and efficiency of the Federal procurement and grants processes
 - by identifying impactful steps to streamline processes and reduce costs and burden



Grants practices and processes

Key Participants: grantees, cooperative agreement holders, subgrantees

<https://cxo.dialogue2.cao.gov/a/ideas/top/campaign-filter/byids/campaigns/13162>

Question: If you could change one thing that would ease your reporting burden associated with your grants or subgrants, what would it be (e.g., time, cost, resource burden)?

Question: If you have reporting requirements to the Federal government, how are those met? (feel free to be specific about what is reported to whom and through what mechanism)

Question: If you could create a central reporting portal into which you could submit all required reports, what capabilities/functions would you include?

OMB circular A-133:

Question: If you could make a change to ease your reporting burden for audits under the Single Audit Act (i.e., audits required by OMB Circular A-133 which is being replaced by the Uniform Guidance 2 CFR 200 Subpart F), what one thing would you change about reporting by the auditee?



The National Dialogue

- National Academies

- Eight meetings in CY15 coordinated by National Academies – *Committee on Federal Research Regulations and Reporting Requirements: A New Framework for Research Universities in the 21st Century*
- NAS report release (9/28/15) – Attachment 2
 - Optimizing the Nation's Investment in Academic Research: A New Regulatory Framework for the 21st Century: Part 1 (2015)
 - Headline: *“Inconsistent, Duplicative Regulations Undercut Productivity of U.S. Research Enterprise; Actions Needed to Streamline and Harmonize Regulations, Reinvigorate Government-University Partnership”*
 - Senator Alexander (Chair of Senate panel that oversees NIH and Dept of Ed)
 - “If you give me 12 recommendations, in priority order, I’m going to ask [staff] to draft them into law,



NEWS

The National Academies of
SCIENCES • ENGINEERING • MEDICINE

Sept. 22, 2015

Inconsistent, Duplicative Regulations Undercut Productivity of U.S. Research Enterprise; Actions Needed to Streamline and Harmonize Regulations, Reinvigorate Government-University Partnership

WASHINGTON -- Continuing expansion of federal research regulations and requirements is diminishing the effectiveness of the U.S. scientific enterprise and lowering the return on the federal investment in research by directing investigators' time away from research and toward administrative matters, says a new congressionally mandated [report](#) from the National Academies of Sciences, Engineering, and Medicine. The report identifies specific actions Congress, the White House, federal agencies, and research institutions should take to reduce the regulatory burden.

- The report also recommends a number of specific actions...
 - **Congress should:** work with OMB to conduct a review of agency research grant proposal documents for the purpose of developing...
 - **Federal agencies should:** limit research proposals to the minimum information necessary to permit peer evaluation of the merit of the scientific questions...
 - **Universities should:** conduct a review of institutional policies developed to comply with federal regulations of research...



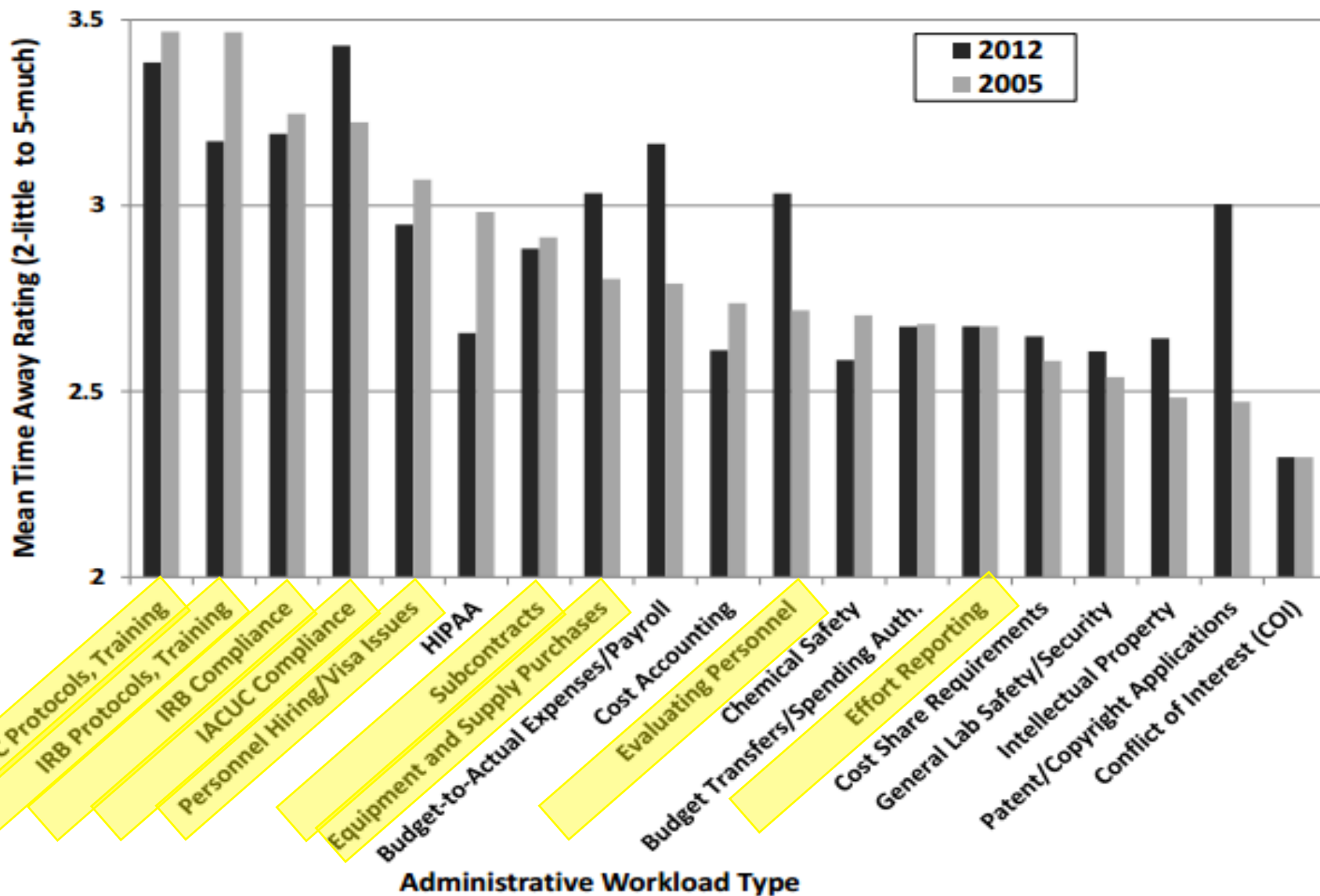
Top 15 National Dialogue Issues

- A. Require Agencies to Adopt Common Research Terms and Conditions (1)
- B. Raise the Micro-purchase Threshold to \$10,000 (2)
- C. Common Federal proposal and award management system (4)
- D. Effort Reporting
 - 1) Clarify in regulations that Personal Activity Reports are not required (6)
 - 2) Explore Optional Use of Alternatives to Time and Effort (8)
- E. Subaward Management
 - 1) Eliminate Prime Recipient Monitoring of Subs Subject to Audit (3)
 - 2) Issue Collaborative Awards as an Alternative to Subawards (7)
- F. Eliminate the DS-2 Requirement for IHEs (9)
- G. COI
 - 1) Clarify Conflict of Interest Regulations in the Uniform Guidance (10)
 - 2) Make Conflict of Interest policies consistent across agencies (11)
 - 3) Establish consistent requirements for disclosure of FCOI (14)
- H. Reporting
 - 1) Eliminate Quarterly Financial Reports (5) and Remove duplicate reporting (12)
 - 2) Reduce Reporting Burdens (13) and Frequency of reports (15)

Numbers in parentheses denote ranking



2012 FDP Faculty Workload Study





Progress/Final Report Preparation

- Related subject in 23 different issues on the National Dialogue. The most of any category.
- Didn't have a separate category on the 2005 or 2012 FDP Burden Comparison graph.
- Mentioned in FDP and under "Themes of Frustration" where the two most common complaints were: Overly time-consuming and too frequent.



Evaluating Personnel

- Mentioned in five different issues posted to the National Dialogue.
- Mean “time away rating” of 2.95 on a scale of 1-5 where 1 meant no time was taken away from research and 5 was a lot of time taken away from research.



Next Steps

- Continue to identify the intersections and the most important issues
- Seek volunteers in the federal and university communities to work on various topics
- Take actions towards understanding and resolving the issues
- Identify the related FDP Committee or Working Group



Discussion and Questions



National Dialogue

- Duke Comments

- 1) Sub recipient monitoring burden related to other A-133 (Single Audit) institutions
- 2) Harmonization of 120 day reporting deadlines for all reports for all sponsors
- 3) Eliminate reporting for revised low-dollar FFR's (NIH)
- 4) Minimize duplication of reports (e.g. FFR, SubAcct and FCTR)



End