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June 2013 COGR Meeting Thursday Morning Presentation - Carol Blum

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**NSB RFI:
Reducing Investigator's
Administrative Workload**

Response from:
COGR, AAU, APLU

1. Sources of Admin Work

- Too Many Regulations
- Shared Governance = Shared Responsibility
- Changes in Processes
- Institutional Resources Limited

Solutions:

- Harmonization
- Performance-Based = Flexibility
- Simple Data Management Systems
- Full Recovery of Costs (Lift the cap to reflect CURRENT regulatory environment)

2. Other Burdens

- Subrecipient Monitoring
- Training & Reporting for Compliance
- Personnel Management, specifically foreign nationals

Solutions:

- Harmonization
- Sub Monitoring focus on high risk
- Train to roles and responsibilities
- Avoid barriers to international collaborations

3. Admin Support

- Some yes; some no
- All get help often indirectly

Solutions:

- Better economy
- Full F&A recovery

4. IRB & IACUC

- Shared Governance = Shared Responsibilities
- Institutions are Risk Adverse

Solutions:

- Avoid Agency Specific Regulations
- Avoid Regulating through Guidance
- Performance-based Approach
- Allow focus on high-risk projects

5. Proposals

- Complex collaborations require complex applications
- Full preparation in applications

Solutions:

- If collaborators have separate relationship with Federal government; rely on that for relationship
- Just-in-Time

6. Agency Specific

- Differing program reporting requirements

Solutions:

- Avoid reporting requirements that fail to provide useful information

7. NSF Requirements

[Appreciation of a cautious approach to regulatory development]

NONETHELESS

- Full budget preparation in application is **ALWAYS** re-budgeted

Solution:

- Modular budgets with just-in-time final budgeting

8. OMB Reforms

- Permit direct costs of admin & technical support
- Eliminate/modify effort reporting

We support (with qualifications!)