

COUNCIL ON GOVERNMENTAL RELATIONS

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The Government Accountability Office (GAO) released the report [*Federal Research Grants: Opportunities Remain for Agencies to Streamline Administrative Requirements*](#) on July 22. GAO interviewed administrative staff and researchers at six public and private institutions and officials from university stakeholder organizations about Office of Management and Budget (OMB) and federal agency efforts to reduce administrative workload and costs. GAO also interviewed federal officials at OMB and the Office of Science and Technology Policy (OSTP) about their roles in establishing and coordinating government-wide research policies and the National Institutes of Health (NIH), National Science Foundation (NSF), Department of Energy (DOE) and the National Aeronautics and Space Administration (NASA) about the process for developing and modifying requirements and efforts to reduce compliance costs.

Areas of Focus

The report focuses on nine areas. Of these, five relate to the OMB Uniform Guidance, including preparing and managing budgets; documenting personnel expenses; competing and documenting purchases; reporting on subawards; and managing subrecipients. The remaining four include agency-specific administrative requirements, including biosketches; graduate student and postdoctoral mentoring plans; conflict of interest (COI); and data management plans/public access. Within these areas, GAO examined the sources and goals of the requirements, the factors that contribute to universities' administrative workload and compliance costs, and OMB and research funding agency efforts to reduce them.

Factors Contributing to Workload and Cost

Universities and other stakeholders identified three common factors as contributors to administrative workload and cost. The first is variation in agencies' implementation of requirements. As an example, the reports notes that universities have updated their IT systems to accommodate different COI requirements and/or have dedicated staff with expertise on the various agency policies to ensure compliance. This variation also requires that researchers learn different agencies' requirements and customize and reformat application materials accordingly. A second factor is detailed documentation due at proposal submission. This includes proposed budgets, biographical sketches, information on subawards, data management plans, and in some cases information on COI and researcher mentoring and development plans. Institutions noted that many proposals are not funded and there can be a relatively high level of uncertainty about specific details of a project at the proposal stage. A final factor cited as contributing to workload and cost is prescriptive requirements. The report cites OMB requirements for competition and documentation of purchases that are more prescriptive than those in the prior circular and the revised Public Health Services (PHS) regulations governing financial COI. The report also suggests that the prescriptive nature of OMB's subrecipient monitoring requirements adds to

universities' administrative workload and costs. GAO suggests that this limits universities' flexibility and requires them "to allocate administrative resources toward oversight of lower-risk purchases, subrecipients, and financial interests."

Federal Efforts to Reduce Administrative Burden

The report suggests that OMB and research funding agencies have made continuing efforts to reduce universities' administrative workload and costs. It reviews federal efforts to standardize administrative requirements, including the establishment of the Research Business Models (RBM) Working Group in 2003, an interagency group charged with unifying research grant administration processes. Among the successes noted are a standard progress report; the development of Grants.gov; the Uniform Guidance; the use of standard, government-wide forms for reporting financial and performance information; the DATA Act, which is piloting a central financial reporting system; a central electronic portal where researchers can assemble biographical information for biosketches (SciENCv); and federal-wide research terms and conditions (RTCs; although the RTCs currently under development will not be federal-wide).

Recommendations

The report indicates that reductions in administrative workload and costs have been limited and opportunities exist to further standardize and streamline agency requirements. This includes standardizing forms and systems specific to budgets and biographical sketches; postponing pre-award requirements such as detailed budgets; and allowing greater flexibility, including with respect to small purchases. The National Science Board (NSB) and National Academies reports made similar conclusions and related recommendations.

The report notes that NSF has taken steps to expand pre-award efforts, partly in response to the NSB recommendations, including piloting efforts to postpone requirements to submit detailed budgets, and that DOE, NASA, and NIH have not taken these steps. The report suggests that while regulations may establish time frames that prevent postponing certain requirements, regulations could be modified to allow for this.

GAO recommends that OMB evaluate options for targeting requirements for research grants to universities on areas of greatest risk for improper use of research funds, including requirements for purchases and subrecipient monitoring. The report suggests that the Uniform Guidance allows for a risk-based approach to monitor subrecipients, but not to follow up on audit findings that pertain to the subaward which applies to all subrecipients. The report notes that "the Uniform Guidance states that OMB may allow exceptions to requirements for classes of federal awards or recipients—for example, when doing so would expand or improve the use of effective practices in delivering federal financial assistance" and that "if implemented by OMB, our recommendation could help universities focus administrative resources on areas of highest risk and allow researchers to maximize the time spent on conducting research versus completing administrative tasks."

The report indicates that OMB plans to evaluate the impact of the Uniform Guidance on burden and waste, fraud, and abuse by January 2017 and that HHS plans to evaluate the effects of

certain provisions of the PHS COI regulations. The report suggests that to better target risk while maintaining accountability HHS, as part of the planned evaluation of COI, should evaluate options for targeting requirements on areas of greatest risk for conflicts, “including adjusting the threshold and types of financial interests that need to be disclosed and the timing of disclosures.” It notes that university officials generally agreed that the additional financial interests that must be disclosed and reviewed under the revised COI requirements, in particular sponsored travel costs, rarely result in identification of actual conflicts. HHS concurred with the recommendation.

GAO recommends that RBM “whose charter calls for it to examine opportunities and develop and report on options to unify and streamline agency research grants administration practices” is well suited to address recommendations to standardize and streamline requirements. COGR believes the Research Policy Board recommended by the National Academies Committee on Federal Research Regulations and Reporting Requirements, which would include both federal and university members, would be well-suited to address these issues, providing necessary stakeholder input as regulatory requirements, systems and forms are modified and, importantly, reducing burden and cost by prospectively addressing new requirements. In the absence of such a board, the RBM may be the appropriate forum for addressing these issues. However we would note that the progress made by the subcommittee since 2003 has been slow, that there is discontent with the work products created, and that opportunities for stakeholder input are limited.