

UNIVERSITYof WISCONSIN
UW MILWAUKEE
Graduate School
Research Services and Administration

February 23, 2001

Attn: PL 106-107 Comments
Department of Health and Human Services
200 Independence Avenue, SW
Room 517-D
Washington, DC 20201

Dear Sir or Madam:

In response to the Request for Public Comment issued January 17, 2001, in the *Federal Register*, Volume 66, Number 11, 4583-4593, and on behalf of the University of Wisconsin-Milwaukee, I offer the following comments relating to the implementation of Public Law 106-107. The staff of the Office of Research Services and Administration appreciates the opportunity to comment.

Our comments are general in nature:

- \$ Any research administration office would welcome a common portal to the various Federal agencies, i.e. we support the implementation of the Federal Commons as expeditiously as possible.
- \$ It would be helpful if cover pages were standardized across agencies.
- \$ It would help expedite the submittal process if assurance forms could be streamlined or eliminated. An institutional signature on a cover page should suffice for referenced, individual assurances.
- \$ Agencies should strive for consistency between their printed forms and those that are downloadable from the web. Often the two are not identical.
- \$ Financial reporting requirements are inconsistent across agencies. To the greatest degree possible, these requirements should be standardized.
- \$ Electronic submittal processes and protocols should never permit transmittal except through the institution's grants office, i.e. without institutional approval. Any agency implementing such an electronic process should incorporate safeguards similar to those in NSF's FastLane..
- \$ There is inconsistency among the agencies in requiring a signed award acceptance (form). There is concern that a unilateral notification process allows for inadequate review of the terms and conditions of an award.
- \$ Agencies should strive to make program guidelines as clear as possible and be cognizant of the need to provide explicit definition of the terms used in those guidelines.

Thank you for bringing our comments to the attention of those reviewing the implementation of the Act.

Associate Dean