

## UNIVERSITY OF CALIFORNIA, LOS ANGELES

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March 16, 2001

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

Subject: Request for Comment; Interim/Draft Plan of Action To Implement Public Law 106-107, the Federal Financial Assistance Management Improvement Act of 1999

We are writing on behalf of the University of California, Los Angeles (UCLA) to provide comments on Public Law 106-107 as requested in the January 27, 2001 *Federal Register*. UCLA collaborated with the other campuses of the University of California in preparation of comments already submitted by David F. Mears, Director, Research Administration Office, University of California Office of the President and fully endorses the general recommendations and comments conveyed within that letter. We concur with the overall message that standardization, consistency, and simplification are the keys to any system implemented by the federal agencies.

As an active member of the Federal Demonstration Partnership (FDP), we are aware of and have participated in federal agency pilots focused on streamlining the grant-making process. Through the FDP, we have followed the development and progress of the Federal Commons as a single gateway for electronic grants processing. As a recipient of federal research, training or instruction, and public service awards, we are sensitive to the reality that multiple federal agency requirements can be duplicative, burdensome or conflicting. We are concerned about the number of electronic systems being implemented by federal agencies with little or no coordination among agencies or consultation with the recipient community. Therefore, in addition to comments contained within the UC letter, we would like to make the following recommendations.

§ Implementation of an agency-wide system must be dependent on the use of constant

information exchange standards: a single set of across-the-board standards should be mandated. Any agency-specific variations should be obvious and subject to prior approval by a designated government monitor such as the Interagency Electronic Grant Committee.

- § Individually developed systems and unique sets of requirements by single federal agencies (and their subunits) should be eliminated or hidden behind a common access portal such as the Federal Commons. An applicant, whether individual or institutional, should have to work with a single, common application, administrative and reporting system for the many programs administered by Federal agencies.

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The role that institutions play in the grant-making process cannot be disregarded. As the General Accounting Office (GAO) expects certain data to be collected and maintained at the institutional level, each institution must be able to monitor its own data to satisfy audit requirements. If institutions are to be held administratively and fiscally responsible for federally issued awards, then the application system must include, as an integral component, institutional review and approval prior to final application submission.

Educational institutions and federal agencies are partners in the grant-making process. As a function of that partnership, university community representatives should be formally involved in the proposed working groups (Pre-Award, Post-Award, Audit Oversight, and Electronic Processing) being formed under the interim/draft plan of action to implement P.L. 106-107.

some of the ideas, comments, and thoughts provided here and within the UC systemwide letter are not new. They represent ongoing concerns for the university community. They are however, critical elements of a streamlined system. As indicated earlier, it's our belief that standardization, consistency, and simplification are the keys to any system implemented by the federal agencies. Therefore, while we recognize that it will take time to put a single system (the Federal Commons) into effect, we fully encourage federal agencies' participation in implementing such a system.

we appreciate the opportunity to provide these comments. Thank you for your consideration of this important matter.

Sincerely,

Vice Chancellor  
Research