

Office of Grant & Contract Administration

March 15, 2001

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

Email Transmittal: PL106107@os.dhhs.gov

Dear Sir or Madam:

On behalf of the Grant and Contract Administration Office of the Fred Hutchinson Cancer Research Center, I would like to take this opportunity to comment on the interim/draft plan of action to implement Public Law 106-107, as published in the Federal Register.

The Hutchinson Center is one of 35 comprehensive cancer research centers, as designated by the National Cancer Institute. Thus, we have fewer interactions with government agencies outside of HHS and will not address the specific questions raised in the plan about multiple agencies. Nonetheless, we strongly support the intent of Public Law 106-107 to streamline the management of federal financial assistance programs in order to improve the delivery of services to the public. We appreciate the opportunity to participate in this process.

We would like to comment on several issues described in the implementation plan:

1. One of the tasks of the Post-Award Work Group is to improve the consistent use of language and terminology in OMB Circulars A-21, A-87 and A-122. While we understand

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the advantages of consistency in language and terminology, we would like to stress that the circulars apply to different types of grantees. It is important to preserve the features of the circulars that are unique by type of recipient organization. We urge the work group to exercise caution with respect to any changes in the language of the circulars or any attempts to consolidate them. It is critical that the circulars recognize the different organizational missions of grantees and the business practices that support the research of the organization.

2. An ongoing concern of ours regarding electronic research administration is that many different systems could emerge from this effort. The creation of many segregated systems would cause great difficulty for grantees through increased needs for equipment and software, personnel, and training. Presumably, the grantees would have to bear the expense of these necessary changes. Any effort to create a consistent single system would reduce this burden significantly. Therefore, we support the Electronic Processing Work Group's efforts to develop a "one-stop Federal Gateway" through the Federal Commons. We encourage the work group to pursue the implementation of a single interface that can be used to transmit data to all Federal funding agencies. A single interface would not only reduce our burden and expense, but it would also improve the quality and consistency of the information we transmit to Federal funding agencies.
3. Upon review of each work group's tasks, it is unclear whether issues concerning non-fiscal post-award management are being addressed by any of the groups. There are many instances in the life cycle of a grant in which the grantee must communicate with the funding agency regarding non-fiscal matters (e.g. obtaining approvals for changes in the scope of work, change of PI, grant transfer or relinquishment, etc.). A single consistent

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method of communicating with various funding agencies would be greatly beneficial. It appears that this issue may fall within the task of the Electronic Processing Work Group, but the implementation plan is not clear in that respect. It is important that this area not be overlooked.

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4. We support the Electronic Processing Work Group's goal of developing a boilerplate certifications and assurances form that can be accessed by all the participating funding agencies. Eliminating the need to submit this form with each grant application would help expedite the grant application process.

Thank you for allowing us the opportunity to participate in this endeavor. We look forward to the many positive changes that lie ahead.

Sincerely,

Director