

FEDERAL DEMONSTRATION PARTNERSHIP

National Academy of Sciences
Government-University-Industry Research Roundtable
2101 Constitution Avenue, NW Washington, D.C.

March 19, 2001

Attn: PL 106-107 Comments
Department of Health and Human Services
200 Independence Avenue, S.W., Room 517-D
Washington, D.C. 20201

Transmitted via E-mail to PL106107@os.dhhs.gov

Subject: Federal Demonstration Comments on Public Law 106-107 Grant-Making Process

On behalf of the Federal Demonstration Partnership (FDP Phase III), I would like to thank you for the opportunity to comment on the plan to implement Public Law 106-107. The FDP is a consortium of 11 federal agencies, 65 institutions and 7 affiliate organizations committed to increasing research productivity by streamlining the administrative process and minimizing the administrative burden on principal investigators while maintaining effective stewardship of federal funds. During the current phase, electronic research administration (eRA) is a primary focus. Although the scope of PL 106-107 is broader than individual grants to research universities and organizations, these comments are focused primarily on such awards.

The FDP enthusiastically supports the government's efforts to streamline the grants making and administering process, which encourages the development of common systems and uniform administrative rules and reporting requirements, and requires dialogue with partners in the process.

We believe that implementing standardized and simplified approaches is best achieved by the eventual elimination of forms in favor of the consistent use of data standards. We strongly encourage agencies to develop a common approach to application, award and payment systems as envisioned in the Federal Commons. The FDP believes that a common approach is the only way that significant, long-term reductions in administrative burden and cost can be realized. Streamlining within a single agency will do little to help the institutional community. The attachment to this letter includes a listing of FDP institutional, agency, affiliate, and executive committee members, an executive summary of our recommendations, followed by a more detailed response to each of the questions in the *Federal Register* request for comments. We have also included a copy of our Core Principles for Electronic Commerce in Grants Administration.

Given the time constraints and breadth of the request for comments, our responses and recommendations are not meant to be all inclusive, but rather the beginning of what we hope will be an ongoing dialogue. Again, thank you for the opportunity to provide comments. We believe that these recommendations will be useful and hope that they will be given your full consideration. FDP stands ready to enter into continuing dialog with agencies as they implement PL 106-107.

For more information on FDP, we encourage you to visit our Web site at: <http://www.fdp3.org/>

If you have questions or would like additional information from us, please contact me at 847/491-3003 or via e-mail, bsiegel@northwestern.edu.

Sincerely,

Chair, Federal Demonstration Partnership

Attachment

FDP INSTITUTIONS:	
<p>Alabama: Oakwood College</p> <p>Arizona: The University of Arizona</p> <p>California: University of California System University of California at Irvine University of California at Los Angeles University of California at Riverside University of California at San Diego University of California at San Francisco University of California at Santa Barbara California Institute of Technology San Diego State University San Diego State University Foundation University of Southern California</p> <p>Colorado: Colorado State University</p> <p>District of Columbia: Georgetown University</p> <p>Florida: University of Florida Florida Agricultural and Mechanical University Florida Atlantic University University of Central Florida Florida International University University of Miami University of North Florida Florida State University University of South Florida The University of West Florida</p> <p>Georgia: Emory University</p> <p>Hawaii: University of Hawaii</p> <p>Illinois: University of Illinois at Urbana-Champaign University of Chicago Northwestern University</p> <p>Kansas: University of Kansas & University of Kansas Center for Research, Inc.</p> <p>Maryland: University of Maryland at College Park Johns-Hopkins University</p> <p>Massachusetts: University of Massachusetts Medical Center Massachusetts General Hospital (The General Hospital Corporation) University of Massachusetts Lowell University of Massachusetts - Lowell Research Foundation Massachusetts Institute of Technology</p> <p>Michigan: University of Michigan</p> <p>Nebraska: University of Nebraska at Lincoln</p>	<p>New Hampshire : Dartmouth College</p> <p>New York: SUNY - Albany SUNY - Binghamton SUNY - Brockport SUNY Health Science Center - Brooklyn SUNY - Buffalo SUNY - College at Buffalo SUNY - Stony Brook SUNY Health Science Center - Syracuse The Research Foundation - SUNY Columbia University Cornell University</p> <p>North Carolina: North Carolina State University University of North Carolina at Chapel Hill University of North Carolina at Wilmington</p> <p>Ohio: Case Western Reserve University University of Cincinnati Kent State University The Ohio State University</p> <p>Pennsylvania: University of Pennsylvania Penn State University</p> <p>Tennessee: The University of Memphis</p> <p>Texas: The University of Texas System Texas Agricultural Experiment Station Texas A&M University Texas A&M Research Foundation University of Texas at Austin Baylor College of Medicine The University of Texas at Dallas</p> <hr/> <p>University of Texas Southwestern Medical Center at Dallas Texas Engineering Experiment Station University of Houston The University of Texas Health Science Center at Houston University of North Texas Rice University The University of Texas Health Science Center at San Antonio Texas Tech University</p> <p>Virginia: University of Virginia</p> <p>Washington: Fred Hutchinson Cancer Research Center</p> <p>Wisconsin: University of Wisconsin-Madison</p>

<u>Federal Agencies</u>	Affiliate Organizations
<p>AFOSR -- Air Force Office of Scientific Research</p> <p>AMRMC -- Army Medical Research & Materiel Command</p> <p>ARO -- Army Research Office</p> <p>DOE -- Department of Energy</p> <p>EPA -- Environmental Protection Agency:</p> <p>FMS -- Financial Management Service, (Dept of Treasury)</p> <p>NASA -- National Aeronautics & Space Administration</p> <p>NIH -- National Institutes of Health</p> <p>NSF -- National Science Foundation</p> <p>ONR -- Office of Naval Research</p> <p>USDA -- Department of Agriculture</p>	<p>AAMC -- Association of American Medical Colleges</p> <p>ABRF -- Association of Biomolecular Resource Facilities</p> <p>AIRI -- Association of Independent Research Institutes</p> <p><i>COGR -- Council on Governmental Relations</i></p> <p>FASEB -- Federation of American Societies for Experimental Biology</p> <p>NCURA -- National Council of University Research Administrators</p> <p>SRA -- Society of Research Administrators</p>

FDP Executive Committee Members:

Barbara Siegel (Chair)	Northwestern University
Constance Atwell	DHHS/NIH/NINDS
Wendy Baldwin	National Institutes of Health
Denise Clark	Cornell University
Robert Hardy	National Science Foundation
Thomas Moss	National Academy of Sciences
William Olbricht	Cornell University
Charles Paoletti	Office of Naval Research
Sarah Wasserman	University of Illinois

Executive Summary of FDP Recommendations on the Public Law 106-107 Grant Making Process

Application forms/processes:

- Develop electronic data streams or data sets in place of forms.
- While the Federal Commons plans to include several methods for receiving applications, we urge that one method allow for computer-to-computer data transmission via EDI and/or other electronic data streams.
- Standardize application elements whenever practical, as most elements requested in the numerous Federal application forms are identical or similar.
- Reduce the number of data streams required at the time of application to the essentials. Items that could be received at other times include certifications and assurances (provide annually), and human subjects and animal care (provide during award consideration).
- Initiate a process that requires a change in data standards to undergo the same scrutiny as OMB now has with forms.

Terms and Conditions:

- Require agencies to provide statutory justification for differences between any existing or proposed terms and conditions and those contained in OMB circulars
- Develop standardized terms and conditions by types of major assistance—research, construction, student aid, etc., and by organization type—universities, other non-profit organizations, state and local governments
- Consider adopting FDP III Terms and Conditions for all agencies

Payment systems:

- In accordance with the Chief Financial Officers Act, reduce the number to 1 or 2 for civilian agencies
- Encourage DOD and other agencies currently without a pooled payment system to develop one
- Standardize the financial reporting requirements to rely more extensively on Federal Cash Transaction Reports than on Financial Status Reports

Audit issues:

- Increase reliance of agencies on the single audit and reduce the number of “inspections” and program-specific audits
- Reduce overlap of F&A rate audits and single audits
- Provide better guidance about what constitutes materiality in a finding
- Enhance the SAC form to provide enough information for an institution to determine whether sub-recipients’ finding relates to its award.

Electronic processing:

- FDP institutions have, sometimes eagerly, sometimes reluctantly, used/tested every electronic system developed for Federal grants. Many have serious shortcomings in security, flexibility, accountability or reliability.

- FDP will support, and FDP institutions will use common federal electronic application, award, reporting, and payment systems.
- FDP opposes the development of stand-alone electronic systems developed by any single agency.
- Many FDP institutions would be considered “early adopters” of new technology, and would be willing to participate in the continued development of common on-line application and financial reporting systems.

FDP Detailed Response on the PL 106-107 Grant-Making Process

I Application and Reporting Forms

A. *Please identify application and reporting forms you believe could be improved or streamlined.*

General Comments

FDP believes that agencies should be moving to replace forms with data streams structured according to government-wide data standards. These data streams include various attachment files, in PDF format. This response addresses the issue of common data requirements, irrespective of whether the information is entered onto forms or transmitted according to data standards.

A non-trivial amount of human capital is expended in educating PI's, departmental support staff, and central sponsored projects office staff in the subtle differences in the ways agencies accomplish essentially the same purposes. Since all agencies providing financial assistance are subject to OMB circulars, it should be possible to build a more common framework for delivering financial assistance.

Comments on Funding Agency Form Sets

Application forms for the kind of financial assistance provided to universities and non-profit research organizations vary considerably across agencies. **No institution can fully implement an electronic proposal development and submission system so long as each agency requires that proposal data be represented on its individual forms.**

- HHS has different form sets that vary with the type of financial assistance (research, fellowships/traineeships) and whether the proposal is for a new project or a non-competing continuation, and whether the project uses “modular” budgeting. These same form sets are used agency-wide. ARO has form sets for all aspects of research proposals, as does NSF, though the NSF forms are now populated through FastLane.
- Some agencies have a few standard forms that are used agency-wide (or at least for that entity within an agency that funds external research), usually things like coverpages, budgets, and certifications, but has no specified forms for the remainder of the proposal. Examples include EPA's National Center for Environmental Research, AFOSR, and DOE's Office of Science.
- ONR and NASA set forth what they expect to see in a proposal, but don't specify forms (except certifications, in ONR's case).
- Other agencies require the use of a few standard forms, but otherwise allow individual funding programs to specify the format of grant applications. We would like to single out for special attention the U. S. Department of Education. On its website at <http://www.ed.gov/GrantApps/#84.250B> there are 21 separate discretionary grants application packages...almost as many grant packages as there are programs. USDA also

has a lot of non-statutorily required variations in the grant application instructions of various programs, even within CSREES.

- AMRMC has a small number of external research programs, and has developed some common and some different forms for each program. One of the forms is a scantron form that is completed with a #2 pencil!
- Finally, some agencies, like Commerce and Transportation, don't have form sets, and rely instead on the SF 424 for coverage, budget, and certifications/assurances.

One can get an idea of the proliferation of application forms by visiting the site <http://tram.east.asu.edu/forms/index.html>. This site was originally developed by the Texas Research Administrator's group, and is now managed by Arizona State University. Individuals from throughout the country share electronic forms they develop at this site.

Recommendations:

- So long as agencies require the use of particular forms—they should provide application kits and program guidelines in iPDF, in addition to whatever other common formats they choose. PDF is platform independent, provides high-quality document resolution, and the software is free. Creating multiple platform-dependent programs does not guarantee that clients can obtain a document. Example: <http://www.reeusda.gov/1700/funding/ourfund.htm> makes available the Standard Application Kit in MSWord and WordPerfect, but not PDF (although further down the page the Citrus Tristeza RFP is available in PDF only). Small institutions may not have the latest versions of these two programs and could encounter download and/or printing problems. A PDF version would eliminate such potential problems.
- They should standardize placement of URL's for obtaining application kits and guidelines--preferably at the beginning of a solicitation, and not buried in the middle or the end. Example: Jan. 19, 2001 Federal Register, page 6208, USDA RFP for Citrus Tristeza Research. URL not listed until Part III, page 6210.

Comments of Agency Application Requirements.

These comments are organized according to a typical research proposal outline. They are not intended to cover the requirements of all agencies and programs, but rather to illustrate the degree of variability.

- Cover Page
- Table of Contents
- Abstract
- Biographical Information
- Publications
- Current & Pending Support
- Technical Narrative/Research Plan

- Bibliography/References
- Facilities/Resources
- Budget
- Pre-award Certifications and Assurances
- Reviewer Conflicts of Interest
- Appendices

The possibility of machine-to-machine transmission and receipt of proposals rests on greater standardization of the requirements for each of these sections.

Cover Page. Standardizing what is now on widely varying agency cover pages has already been addressed in the development of the Grants Data Dictionary maintained by IAEGC at <http://www.financenet.gov/financenet/fed/iaegc/develop.htm>. Adoption of the Institutional Profile developed by the Federal Demonstration Partnership would eliminate the need to submit institutional information redundantly with each proposal. This profile is found at: <http://fdp3.org/ipfinal.html>. (In the spirit of paperwork reduction, we are providing the URL for where materials can be found rather than making voluminous appendices.) The issue that remains about cover pages is the use of statements that accompany PI and especially institutional official signatures. In some cases, signature blocks are used to extract certifications that are not required by Statute. For a fuller discussion of this issue, see the **Certification and Assurances** section, below.

Table of Contents. There would be significant technical challenges to developing a Table of Contents in an electronic proposal, given that some segments are PDF files and others text or data. Given the variability in printers, page numbering would not necessarily be the same on different printers. The value of a table of contents should be weighed against the difficulty of producing it. There may be other acceptable alternatives to a Table of Contents. The Grants Data Dictionary doesn't seem to generate a table of contents. Pagination would vary with printers.

Abstract. Even for something as simple as an abstract, the variations across agencies and programs are considerable. Examples from several agency application instructions are shown below. Some of them make reference to what the content should be; others the restriction on length, and still others possible uses of the information.

ARO: The Project Abstract shall include a statement of objectives, methods to be employed, and the significance of the proposed activity to the advancement of knowledge or education. Avoid use of the first person to complete this summary. DO NOT EXCEED ONE PAGE. The abstract should be suitable for release under the Freedom of Information Act, 5 U.S.C. 552, as amended.

One DEd Program: The abstract of the proposed research should be no more than one page and include: statement of relevance, objective of the research, approach, and scientific merit. Identify other parties who will receive the proposal or may fund the proposed effort or activity.

Another DEd program: Be sure to include an abstract of your proposed research project in the space provided. Strong abstracts contain the following: (1) a description of the issue or problem

being addressed and why that is important: (2) a summary of the methodology being used and why that approach will yield the intended results, and (3) the intended results or outcomes of the work and a summary of why those results or outcomes are important. If your application is funded, this abstract may be sent to your congressional representatives as a description of your project. It may also be the basis of a public announcement about the grant awards.

DOE Office of Science Grant Application Guide: *None Required.*

NSF: *The proposal must contain a summary of the proposed activity suitable for publication, not more than one page in length. It should not be an abstract of the proposal, but rather a self-contained description of the activity that would result if the proposal were funded. The summary should be written in the third person and include a statement of objectives, methods to be employed and the potential impact of the project on advancing knowledge, science and mathematics education, and/or human resource development. It should be informative to other persons working in the same or related fields and, insofar as possible, understandable to a scientifically or technically literate lay reader.*

NIH: *State the application's broad, long-term objectives and specific aims, making reference to the health relatedness of the project. Describe concisely the research design and methods for achieving these goals. Avoid summaries of past accomplishments and the use of the first person. This description is meant to serve as a succinct and accurate description of the proposed work when separated from the application. If the application is funded, this description, as is, will become public information. Therefore, do not include proprietary/confidential information. **DO NOT EXCEED THE SPACE PROVIDED.** [one half page]*

NASA: *Include a 200-300 word abstract stating the rationale of the proposed effort and the method of approach in relation to the needs of NASA.*

EPA Research and Demonstration Grants: *Each application for research must include a summary (NRP) of proposed work (200 words or less) incorporating objectives, approach and current plans and/or progress. Upon approval of an application, summaries are forwarded to the Smithsonian Science Information Exchange. Summaries of work in progress are exchanged with government and private agencies supporting research and are forwarded to investigators who request such information.*

EPA: National Center for Environmental Research: *The abstract, limited to one page, should include the following information, as indicated in the example format provided.*

1. Research Category and Sorting Code: Enter the full name of the solicitation to which your application is submitted and use the correct code that corresponds to the appropriate RFA topic. (Be sure to substitute the appropriate letter and number for the "XX" in 2001-STAR-XX).

2. Title: Use the exact title as it appears in the rest of the application. The title of the application must be brief, yet represent the major thrust of the project. Because the title will be used by those not familiar with the project, avoid highly technical words or phraseology. Do not use phrases such as "research on."

3. *Investigators:* Start with the Principal Investigator. Also list the names and affiliations of each major co-investigator who will significantly contribute to the project. Provide a web site URL or an E-Mail contact address for additional information.

4. *Institution:* List the name and city/state of each participating university or other applicant institution, in the same order as the list of investigators.

5. *Project Period:* Provide the proposed project beginning and ending dates.

6. *Project Cost:* Provide the total request for all grant years to EPA for the entire project period.

7. *Project Summary:* Provide three subsections addressing: (a) the objectives of the study (including any hypotheses that will be tested), (b) the experimental approach to be used (which should give an accurate description of the project as described in the proposal), and (c) the expected results of the project and how it addresses the research needs identified in the solicitation, including the estimated improvement in risk assessment or risk management that will result from successful completion of the work proposed.

8. *Supplemental Keywords:* A list of suggested keywords is provided for your use. Do not duplicate terms already used in the text of the abstract. Providing a complete set of keywords is very important.

Recommendation: The Grants Data Dictionary includes a paragraph type for Abstract that is 4096 ascii characters—about 1 to 1 and ½ pages of “normal text.” Agencies should conform to this standard for length and character set, but otherwise make their own requirements for content, possibility of publication, etc.

Biographical Information

The Federal Demonstration Partnership has developed the suggested format for submission of biographical information--<http://fdp3.org/cfdoc01.html>. This work goes a long way towards standardizing the kinds of requirements cited below. In addition to implementing this format, agencies also need to agree on some nomenclature which will identify those individuals for whom a “biosketch” is to be submitted. (This same nomenclature should be used to identify individuals whose names need to be shown in budgets.) Terms in use now include “key personnel,” “senior personnel,” “principal and co-principal investigators,” “program/project director,” “senior associate,” “senior staff,” “other professional personnel,” and “important co-workers.”

Here are some examples of biographical information requirements that currently exist:

EPA National Center for Environmental Research: *The resumes of all principal investigators and important co-workers should be presented. Each resume must not exceed two consecutively numbered (bottom center), 8.5x11-inch pages of single-spaced standard 12-point type with 1-inch margins for each individual.*

NASA: *Outline the relevant experience and/or expertise of all key personnel in a way that would demonstrate these capabilities in relation to the proposed effort; a short biographical sketch, a list of principal publications, and any exceptional qualifications should be included.*

USDA CSREES Biotechnology Risk Assessment Research Grants Program: *The curriculum vitae should be limited to a presentation of academic and research credentials, e.g., educational, employment and professional history, and honors and awards. Unless pertinent to the project, to personal status, or to the status of the organization, meetings attended, seminars given, or personal data such as birth date, marital status, or community activities should not be included. The vitae shall be no more than two pages each in length, excluding the publication lists.*

USDA CSREES Initiative For Future Agriculture and Food Systems: *Vitae of each PI/PD, senior associate and other professional personnel. This section should include vitae of all key persons who are expected to work on the project, whether or not CSREES funds are sought for their support. The vitae should be limited to two (2) pages in length, excluding publication lists.*

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BIOGRAPHICAL SKETCH

Provide the following information for the key personnel in the order listed on Form Page 2. Photocopy this page or follow this format for each person.

EDUCATION/TRAINING *(Begin with baccalaureate or other initial professional education, such as nursing, and include postdoctoral training.)*

INSTITUTION AND LOCATION	DEGREE (if applicable)	YEAR(s)	
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RESEARCH AND PROFESSIONAL EXPERIENCE: Concluding with present position, list, in chronological order, previous employment, experience, and honors. Include present membership on any Federal Government public advisory committee. List, in chronological order, the titles, all authors, and complete references to all publications during the past three years and to representative earlier publications pertinent to this application. If the list of publications in the last three years exceeds two pages, select the most pertinent publications. **DO NOT EXCEED TWO PAGES.**

**Competing Continuation Applications
PERSONNEL REPORT**

All Key Personnel for the Current Budget Period

Name	Degree(s)	SSN	Role on Project <i>(e. g. PI, Res. Assoc.)</i>	Date of Birth <i>(MM/DD/YY)</i>	Annual % Effort
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NSF form 1225: *NSF is committed to providing equal opportunities for participation in its programs and promoting the full use of the Nation’s research resources. To aid in meeting these objectives, NSF requests information on the gender, race, ethnicity and disability status of individuals named as PIs/co-PIs on proposals and awards. Except for the required information about current or previous Federal research support and the name(s) of the PI/co-PI, submission of the information is voluntary, and individuals who do not wish to provide the personal information should check the box provided for that purpose.*

The ethnicity category for Hispanics on the current NSF form does not match the EEOC categories that most institutions maintain.

NSF Grant Proposal Guide:

Biographical sketches are limited to two pages each and are required for all senior project personnel. (See Appendix B for the definition of Senior Personnel.) The following information must be provided in the order and format specified below:

- a. Professional Preparation. A list of the individual’s undergraduate and graduate education and postdoctoral training as indicated below:*

*Undergraduate Institution(s) Major Degree & Year
Graduate Institution(s) Major Degree & Year
Postdoctoral Institution(s) Area Inclusive Dates (years)*

- b. Appointments. A list, in reverse chronological order, of all the individual’s academic/professional appointments beginning with the current appointment.*

DOE Office of Science Grant Application Guide: *This information is required for senior personnel at the organization submitting the application, as well as any subcontractors. The biographical sketch is limited to a maximum of two pages. It must contain name and position title, organization, degree, years and field of study for each academic degree; a listing of research and professional positions, awards, and honors; and references to all publications for the past three years along with any earlier publications pertinent to this application. If this list causes the biographical sketch to exceed two pages, select the most pertinent publications to stay within the page limit.*

ONR: *Names of and brief biographical information on the key personnel.*

AFOSR: *Furnish the vitae for those key persons who will be performing the research. The principal purpose and routine use of the requested information are for evaluation of the qualifications of those persons who will perform the proposed research. Failure to provide such information will delay award.*

For the principal investigator and each of the senior staff, provide a short biographical sketch and a list of significant publications. List the names and titles of other scientific and technical personnel who will be directly associated with the project; indicate the number of assistants or student research assistants and their scientific or technical training and experience.

Recommendations :

- Use the FDP Biosketch format in lieu of the various requirements that exist today.
- Identify those for whom biographical information must be provided in such a way that institutional electronic proposal development systems can associate these individuals with system-defined proposal roles.
- Complete the work of defining the data elements in the FDP Professional Profile for incorporation into the Grants Data Dictionary, or a subsidiary data set. Part of this effort will involve determining how to transmit rich text or extended character sets.
- Where ethnicity is to be reported, use established EEOC categories.

Publications. Publications are a subset of biographical information. This information is very dynamic, and the individual proposal determines which publications are relevant. Such bibliographic references typically make use of extensive rich text features, such as italics and underline, and scientific characters not in the ASCII character set. This requirement varies considerably across agencies and programs, as shown below.

ARO: *List up to 5 publications most closely related to the proposed project and up to 5 other significant publications, including those being printed. Patents, copyrights, or software systems developed may be substituted for publications. Do not include additional list of publications, invited lectures, etc.*

AFOSR: *“list of significant publications.”*

USDA CSREES Biotechnology Risk Assessment Research Grants Program: *A chronological list of all publications in referred journals during the past five years, including those in press, must be provided for each professional project member for whom a curriculum vitae is provided. Authors should be listed in the same order as they appear on each paper cited, along with the title and complete reference as these items usually appear in journals.*

USDA CSREES Initiative For Future Agriculture and Food Systems: *A chronological list of all publications in refereed journals during the past four (4) years, including those in press, must be provided for each project member for which a curriculum vitae is provided. Also list those non-refereed technical publications which have relevance to the proposed project. All authors should be listed in the same order as they appear on each paper cited, along with the title and complete reference as these usually appear in journals.*

NSF Grant Proposal Guide: *Publications. (i) A list of up to 5 publications most closely related to the proposed project. (ii) A list of up to 5 other significant publications, whether or not related to the proposed project. Each publication identified must include the names of all authors (in the same sequence in which they appear in the publication), the article title, book or journal title, volume number, page numbers, year of publication, and website address if available electronically.*

ONR: *Pertinent bibliography of the investigators.*

NASA: *A list of principal publications should be included for each key personnel.*

NIH: *List, in chronological order, the titles, all authors, and complete references to all publications during the past three years and to representative earlier publications pertinent to this application. If the list of publications in the last three years exceeds two pages, select the most pertinent publications. **DO NOT EXCEED TWO PAGES.***

EPA: *No specific instructions about publications, but biographical information is limited to two pages per person*

DOE: *references to all publications for the past three years along with any earlier publications pertinent to this application. If this list causes the biographical sketch to exceed two pages, select the most pertinent publications to stay within the page limit.*

Recommendations:

- Adopt the FDP Professional Profile format as it relates to publications. Address the issue of whether extended character sets (with scientific notation characters and rich text) can be transmitted, and if not, submit this information as an attachment, such as is envisioned for the 102 Transaction Set.

Budget.

Budget formats vary considerably, and the way costs are budgeted varies, too.

- The NIH non-modular and DOE budgets have line-item budgets only for the first year, with only major cost categories shown for out years. NIH budgets show F&A costs only on the checklist, something that is unique to HHS...all other agencies show F&A as part of the budget itself.
- NASA has one line for labor while NSF has seven.
- USDA-CSREES has one line for the PI and *all* Co-PI's
- NSF and many other agencies have the same 6 categories for "other direct costs," but USDA-CSREES has only 4, and no separate line for subawards or consultants.
- Some agencies use NSF's "Participant Support" categories, but many do not. NSF generally doesn't allow F&A on participant costs, although there is no such restriction in the A-21.
- Only AFOSR has a separate category for graduate assistant tuition. (When an institutions budget this is as a line item, other agencies' forms force this cost into "other direct costs" or fringe benefits, where it has to be manually segregated from the costs against which F&A is assessed.)
- NSF (and other agencies that have used its format) budgets personnel in person-months while many other agencies (including PHS) budget percent effort.
- ARO's budget form actually has an option for budgeting man-hours, and DOT budgets often require building a salaries and wages amount based on an hourly rate, which is figure that doesn't exist at most research institutions.
- For smaller institutions where F&A is on Salaries and Wages base, budget formats that lump salary and fringe benefits together into "personal services" make it difficult to separate the fringe out of the salaries for F&A purposes.
- Cost sharing is shown in different ways in proposal budgets. AFOSR has a separate column, and EPA's suggested budget has columns for cost sharing. NSF has a line item (Line M), USDA-CSREES has Line O, DOE has Line K, Army has Line L, and NASA has a line 6. PHS has no explicit way to show cost sharing on the budget form, probably because HHS doesn't require cost sharing.

Recommendation:

- The budget categories and units of measure for all agencies and all university systems should either be those used in the Grants Data Dictionary, or able to be mapped to and from those categories.
- Adopt the line item identification (like the NSF Line M) of a cost sharing amount which would be described in the budget narrative, and could be readily incorporated into a resulting award.
- Where faculty effort is not fully charged to the project, describe in the budget narrative the role the faculty member will play in the project, without quantifying the percentage effort.
- Limit documentation requirements to amounts foregone in the personal services budget and shown on the special cost sharing line.

Current and Pending Support. This information is frequently required in proposals, but the requirements vary by agencies.

NSF:

Support: (Current, Pending Submission, Planned in Near Future, Transfer of Support

Project/Proposal Title:

Source of Support:

Total Award Amount: \$

Total Award Period Covered:

Location of Project:

Person-Months Per Year Committed to the Project. Cal: Acad: Sumr:

EPA National Center for Environmental Research, ARO: Uses same form and requires same information as NSF

CSREES:

NAME (List PI #1 first)	SUPPORTING AGENCY AND AGENCY NUMBER	TOTAL \$ AMOUNT	EFFECTIVE AND EXPIRATION DATES	% OF TIME COMMITTED	TITLE OF PR
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Name of Individual:

Active/Pending

Project Number (Principal Investigator):

Source:

Title of Project (*and/or Subproject*):

Dates of Approved/Proposed Project:

Annual Direct Costs / Percent Effort:

The major goals of this project are...

Overlap (*summarized for each individual*):

DOE-Office of Science Grant Application Guide

The PI/PD(s) are requested to list all their current and pending non-Federal and Federal support.

If the project for which support is being sought is being or has been funded previously by a source other than the Office of Science, identify such support. This information will help the Office of Science analyze shifts in research support and educational activities. If the application is being submitted to other possible sponsors, list all of them. Concurrent submission of an application to other organizations will not prejudice its review by DOE.

AFOSR—*Not required*

ONR: List of other research projects currently being undertaken by the principal investigator. Names of other agencies receiving the proposal and/or currently supporting the effort.

Data elements not required by most agencies:

- “Location of Project” limited to NSF and others who use the same form
- Person-months by Calendar, Academic, or Summer limited to NSF and others who use the same form
- “Agency Award Number” CSREES
- “Annual Direct Costs” for HHS, rather than total
- “Overlap” HHS.

Note that many agencies do not specify details.

The Grants Data Dictionary provides the following data elements related to current and pending support:

Other Support Type*	The type of other support.
Other Support Submission Date	The submission date for active or pending other support.
Other Support Duration	The duration of the other support project.
Other Support Total Project Cost	The total award amount for the other support project.
Other Support Annual Project Cost	The annual direct costs for the applicable year for the other support project.
Other Support Application Number	The supporting organization's application number for the other support project.
Other Support Award Number	The supporting organization's award number for the other support project.
Other Support Major Goals*	The goals of the other support project.
Other Support Overlap	The overlap between the other support project And the project being proposed.
Other Support Months	The number of months of other support to be received by the individual.
Other Support Time Period Type	The type of time period for the other support project or for which the individual receives other support.
Other Support Start Date	The actual or estimated start of the other support project.
Other Support End Date	The date that the other support project is anticipated to end.
Other Support Percentage Level of Effort	The average level of effort to be dedicated to the other support project if less than full time.
*Required	

This section of the Grants Data Dictionary appears to preserve all of the various data elements now in use, except the Location of Project found on the NSF form and Annual Direct Costs required by HHS. Only two data elements are mandatory, from which one can conclude that the agencies that developed this Dictionary did not agree on what to require.

Recommendation:

- Agencies should agree on which of the data elements in the Grants Data Dictionary to require. This would allow institution-based systems to collect and transmit current and pending support information in a common format for all agencies. Replace commitment of percent time with a description of the role to be played on the project.

Technical Narrative/Research Plan. Instructions on this topic are generally limited to page limitations, what is and isn't included in the page limitations, type sizes, margins, etc. Some agencies also suggest topics to be addressed. From a 106-107 perspective, this is a non-issue, so long as nothing more complicated than conversion to Portable Document Format is required, and there is some provision for submitting high-resolution graphics.

References

This is a section specified in many but not all application guidelines. Instructions, where they exist, vary somewhat.

EPA National Center for Environmental Research: References cited are in addition to the 15 pages. (I.e., not included in the page limit for the technical narrative.)

NSF Grant Proposal Guide

Reference information is required. Each reference must include the names of all authors (in the same sequence in which they appear in the publication), the article title, book or journal title, volume number, page numbers, year of publication, and website address if available electronically. Proposers must be especially careful to follow accepted scholarly practices in providing citations for source materials relied upon when preparing any section of the proposal.

DOE—Office of Science Grant Application Guide
Bibliography

A bibliography is required of literature cited in the application's project description and other pertinent literature, as appropriate to the planned project.

PHS 398 Instructions: Literature Cited. List all references. The list may include, but may not replace, the list of publications required in the Progress Report for competing continuation applications. Each reference must include the title, names of all authors, book or journal, volume number, page numbers, and year of publication. The reference should be limited to relevant and current literature. While there is no longer a page limitation, it is important submission of applicant certification to the Food and Drug Administration and its response has elapsed or has been waived and/or whether use of the test article has been withheld or restricted by the Food and Drug Administration.

Recommendation: Since this information is included in the Grants Data Dictionary only as an ASCII text paragraph, it is not a standardization issue. Agencies need to understand they will be receiving this in ASCII text or as part of the technical narrative/research plan PDF document, or as a separate PDF attachment.

Resources

Many application guides specify a section on resources that are available for use by the project.

PHS 398

RESOURCES

FACILITIES: Specify the facilities to be used for the conduct of the proposed research. Indicate the performance sites and describe capacities, pertinent capabilities, relative proximity, and extent of availability to the project. Under "Other," identify support services such as machine shop, electronics shop, and specify the extent to which they will be available to the project. Use continuation pages if necessary.

laboratory, clinical, animal, computer, office, other

MAJOR EQUIPMENT: List the most important equipment items already available for this project, noting the location and pertinent capabilities of each

NSF Grant Proposal Guide: This section of the proposal is used to assess the adequacy of the organizational resources available to perform the effort proposed. Proposers must describe only those resources that are directly applicable.

DOE Office of Science Grant Application Guide

The application should describe available facilities and major items of equipment to be used in the research or educational activity.

Applications requesting equipment should, whenever appropriate describe comparable equipment already at the proposing organization and explain why it cannot be used. The degree of utilization also should be discussed to allow comparison of its capabilities with the needs of the project. Whenever possible, the application should specify manufacturer and model number.

ONR: Description of general and special facilities available for performing the proposed work.

Recommendation: Since this information is included in the Grants Data Dictionary only as an ASCII text paragraph, it is not a standardization issue. Agencies need to understand they will be receiving this in ASCII text rather than in a form, or in PDF format as part of the narrative or a separate PDF attachment.

Subcontracting/consortia

There appears to be little uniformity in proposal requirements for showing planned work with other organizations. Some examples include:

AFOSR: SUBCONTRACT COSTS Support the estimate of subcontract objectives by indicating the specific items or portion of the objectives to be subcontracted; the type of subcontract anticipated; name of subcontractor, if known; and a detailed cost summary and budget.

NASA: Any special cooperative arrangements with industry that will enhance the project should be described. Note, however, that subcontracting significant portions of the project is discouraged.

NASA: JOINT PROPOSALS

Some projects involve joint efforts among individuals in different organizations. Where multiple organizations are involved, the proposal should be submitted by only one of the organizations. In this event, the proposal should clearly describe the role to be played by the other organizations and indicate the legal and managerial arrangements contemplated. Alternatively, the cooperating parties may prefer simultaneous submission of related proposals from each organization, in which case parallel awards would be made. The cover sheet should indicate the related nature of the proposals.

A project of a cooperative nature with NASA is possible. In this case, the proposal should describe the contributions expected from any participating NASA investigator and Agency facilities or equipment that may be required.

NSF Grant Proposal Guide

A collaborative proposal is one in which investigators from two or more organizations wish to collaborate on a unified research project. Collaborative proposals may be submitted to NSF in one of two methods: as a single proposal, in which a single award is being requested (with subawards administered by the lead organization); or by simultaneous submission of proposals from different organizations, with each organization requesting a separate award. In either case, the lead organization's proposal must contain all of the requisite sections as a single package to be provided to reviewers (that will happen automatically when procedures below are followed.)

DOE Office of Science Grant Application Guide

Collaboration
Revised 6/20/00

Applicants are encouraged to collaborate with researchers in other institutions, such as universities, non-profit organizations, for-profit commercial organizations, Federal agencies and DOE National Laboratories (FFRDCs).

Collaborative research applications may be submitted in several ways:

Collaborations Among Private Sector or Academic Organizations

Example A. Lead Organization with Subcontracts to Other Private Sector or Academic Organizations

When private sector or academic organizations intend to propose collaborative or joint research projects, the lead private sector or academic organization may submit a single grant application which includes another organization as a lower-tier participant (subcontractor) who will be responsible for a smaller portion of the overall project. The grant application should clearly describe the role to be played by each organization, specify the managerial arrangements and explain the advantages of the multi-organizational effort. The lead organization must submit an application Face Page (Form DOE F 4650.2) and Budget Pages (Form DOE F 4620.1) and must include the amount to be subcontracted on the Budget Pages. If approved for funding, DOE will provide the total project funds to the lead organization who will provide funding to the other participant via a subcontract. (This type of collaborative arrangement cannot include other Federal agencies or DOE National Laboratories as subcontractors.)

Example B. Lead Organization with Separate Grant Applications for Each Collaborator

When private sector or academic organizations intend to propose collaborative joint research projects, each may prepare a separate grant application, or a relevant portion of a single, integrated scientific application compiled and submitted to DOE by the lead organization. Each collaborating organization must submit a separate Face Page (Form DOE F 4650.2) and Budget Pages (Form DOE F 4620.1) and there must be a clear and distinct scope of work for each participant. The lead organization must submit their own grant application plus the other collaborator's applications to DOE in one package with a cover letter which describes the role to be played by each organization, the managerial arrangements, and the advantages of the multi-organizational effort. If approved for funding, DOE will award a separate grant to each collaborating organization.

NASA: For large or complex efforts involving interactions among numerous individuals or other organizations, plans for distribution of responsibilities and necessary arrangements for ensuring a coordinated effort should be described. Aspects of any intensive working relations with NASA Field Installations which are not logical inclusions elsewhere in the proposal should be described in this part.

PHS 398: Consortium/Contractual Costs Each participating consortium/contractual organization must submit a separate detailed budget for both the initial budget period (Form Page 4) and the entire proposed project period (Form Page 5). Consortium arrangements may involve personnel costs, supplies, and other allowable costs, including Facilities and Administration (indirect) costs. Contractual costs for support services, such as the laboratory testing of biological materials, clinical services, or data processing, are occasionally sufficiently high to warrant a similar categorical breakdown of costs. When Facilities and Administration (F&A) costs are requested by a consortium organization, enter the F&A costs in the F&A cost category for each supplementary budget. Provide the F&A cost base and rate. Leave the direct cost category blank. For the applicant organization budget, list the sum of all consortium/contractual costs (direct and F&A). Insert additional page(s) after Form Page 5, numbering them sequentially. (Do not use 5a, 5b, 5c, etc.)

USDA-CSREES-- Biotechnology Risk Assessment Research Grants Program: Collaborative arrangements. If the nature of the proposed project requires collaboration or subcontractual arrangements with other research scientists, corporations, organizations, agencies, or entities, the applicant must identify the collaborator(s) and provide a full explanation of the nature of the collaboration. Evidence (i.e., letters of intent) should be provided to assure peer reviewers that the collaborators involved have agreed to render this service. In addition, the proposal must indicate whether or not such a collaborative arrangement(s) has the potential for conflict(s) of interest.

All Other Direct Costs (Attach supporting data. List items and dollar amounts. Details of subcontracts, including work statements and budget, should be explained in full proposal.)

The requirements for showing subaward arrangements in existing agency proposal forms ranges from including the budgeted amount in the budget and identifying the prospective subawardees in the budget narrative, to developing agency cover pages, budget forms, and certifications. The 194 transaction set seems to included nested loops that essentially constitute full proposals for subawardees.

Recommendations:

- Proposal submissions should include only the minimal information on prospective subawardees necessary for agency reviewers to evaluate the proposal. This minimal information is: organization name, description of the scope of work, name of the project leader of the subaward, institutional commitment to perform the work, and estimated total costs. Budget detail, certifications, detailed institutional data, and other detailed information of this kind should not be required at the proposal stage.
- There should be a central place for institutions to obtain F&A rates for organizations to whom they want to make subawards

Conflict-of-Interest List

ARO: (B)List of persons, other than those cited in the publication list, who have collaborated on a project or a book, article, report or paper within the last 4 years. Negative reports should be indicated. (C)Names of graduate and post graduate advisors and advisees.

The information in B. and C. is used to help identify potential conflicts or bias in the selection of reviewers.

USDA CSREES Initiative For Future Agriculture and Food Systems: A Conflict-of-Interest List must be provided for all individuals involved in the project (identified as key personnel). Each list should be on a separate page and include alphabetically the full names of the individuals in the following categories: (a) all collaborators on projects within the past four years, including current and planned collaborations; (b) all co-authors on publications within the past four years, including pending publications and submissions; (c) all persons in your field with whom you have had a consulting or financial arrangement within the past four years who stand to gain by seeing the project funded; and (d) all thesis or postdoctoral advisees/advisors within the past four years (some may wish to call these life-time conflicts). This form is necessary to assist program staff in excluding from proposal review those individuals who have conflicts-of-interest with the personnel in the grant proposal. The Program Director, under the specific area or sub-area, must be informed of any additional conflicts-of-interest that arise after the proposal is submitted.

NSF Grant Proposal Guide: List of Suggested Reviewers or Reviewers Not to Include (optional) Proposers may include a list of suggested reviewers that they believe are especially well qualified to review the proposal. Proposers also may designate persons they would prefer not review the proposal, indicating why. These suggestions are optional. The cognizant Program Officer handling the proposal considers the suggestions and may contact the proposer for further information.

Collaborators & Other Affiliations

(i) Collaborators. A list of all persons in alphabetical order (including their current organizational affiliations) who are currently or who have been collaborators or co-authors with the individual on a project, book, article, report, abstract or paper during the 48 months preceding the submission of this proposal. Include collaborators on this proposal. If there are no collaborators, this should be so indicated.

(ii) Graduate and Postdoctoral Advisors. A list of the names of the individual's own graduate advisor(s) and principal postdoctoral sponsor(s), and their current organizational affiliations.

(iii) Thesis Advisor and Postgraduate-Scholar Sponsor. A list of all persons (including their organizational affiliations), over the last five years with whom the individual has had an

association as thesis advisor or postgraduate-scholar sponsor. The total number of graduate students advised and postdoctoral scholars sponsored also must be identified.

The information in part e of the biographical sketch is used to help identify potential conflicts or bias in the selection of reviewers.

Recommendations:

- The Grants Data Dictionary has a paragraph type for “List of Reviewers (Include/Exclude).” This should be adequate to transmit the information on reviewers. There is no paragraph type for collaborators.
- Requiring extensive listings of co-authors, advisor/ee’s, collaborators, is like using a cannot to kill a mosquito. There seems to be an underlying assumption that if contacted to provide a peer review, collaborators or former advisors/ees would not decline based on their previous association with proposal personnel, and would provide biased reviews. Agencies who feel the need to go to this extent to avoid conflicts in reviewers should consider stating their peer reviewer selection guidelines, and be prepared to sanction people who are found to violate them.

Proposal Certifications/Assurances. This is another area where agency requirements vary considerably, where synchronization with changing legal requirements is challenging, and where the streamlining the proposal process by maintaining institutional certifications has not yet happened.

PHS 398 (from cover page form)

15. **PRINCIPAL INVESTIGATOR/PROGRAM DIRECTOR ASSURANCE:** I certify that the statements herein are true, complete and accurate to the best of my knowledge. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. I agree to accept responsibility for the scientific conduct of the project and to provide the required progress reports if a grant is awarded as a result of this application.

16. **APPLICANT ORGANIZATION CERTIFICATION AND ACCEPTANCE:** I certify that the statements herein are true, complete and accurate to the best of my knowledge, and accept the obligation to comply with Public Health Service terms and conditions if a grant is awarded as a result of this application. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties.

Assurances and Certifications (From 398 Instructions)

1. Human Subjects
 - a. Research on Transplantation of Fetal Tissue
 - b. Gender and Minority Inclusion Policy
 - c. Inclusion of Children Policy
2. Vertebrate Animals
3. Debarment and Suspension
4. Drug-Free Workplace
5. Lobbying
6. Delinquent Federal Debt
7. Research Misconduct
8. Assurance of Compliance (Civil Rights, Handicapped Individuals, Sex Discrimination, Age Discrimination)
9. Financial Conflict of Interest

The term used in the Form 398 instructions for many of these statutory requirements is certification, when an assurance is what is required by statute.

DOT:

We will accept, as part of your grant application, photocopies of valid certifications on file with any DOT office.

AFOSR: provides a form to be submitted with each proposal

ARO and ONR provide the content of the certifications in the proposal instructions

DOE: has a form that includes both certifications and assurances that is to be submitted with proposals, even though the assurances are not required until an award is accepted. To compound the problem, the instructions for when this form needn't be submitted are: "...unless your organization has already been advised otherwise by a DOE operations office." Keeping track of when and to which DOE facility a certification was submitted is probably not going to happen in most sponsored project offices.

NSF and NIH are examples of agencies that obtain the certifications along with the Authorized Institutional Official signature on the cover page of the proposal.

In some cases agencies extract certifications that are not statutorily required. The NSF certifications are a good example. The PI's make the following certification:

I certify to the best of my knowledge that:

- (1) the statements herein (excluding scientific hypotheses and scientific opinions) are true and complete, and*
- (2) the text and graphics herein as well as any accompanying publications or other documents, unless otherwise indicated, are the original work of the signatories or individuals working under their supervision. I agree to accept*

responsibility for the scientific conduct of the project and to provide the required project reports if an award is made as a result of this proposal.

I understand that the willful provision of false information or concealing a material fact in this proposal or any other communication submitted to NSF is a criminal offense (U.S.Code, Title 18, Section 1001).

NSF also forces organizations to certify that they have a conflict of interest policy in place.

Keeping current statutory requirements for certifications and assurances is not easy, as requirements can change whenever a bill is enacted into law or amended. As an example, the certification on Drug-Free Workplace has not been required in several years, yet virtually every agency continues to require it (and with each proposal!) This is a function of implementing a Common Rule when the legal requirement on which it is based changes. NASA and NIH have successfully eliminated the Drug-Free Workplace certification in their grant application processes.

NSF, DOD, and possibly others still require the debt delinquency certification.

Recommendations.

- Limit certifications to those statutorily required.
- Don't require a certification where an assurance is what the governing statute requires.
- In proposals, use assurance to address topics agencies feel the need to have a specific indication that the PI or institution is aware of a requirement
- Stop requiring institutional certifications with each proposal; instead collect them annually and make them available to all awarding agencies in a central location.
- Collect, continuously update, and publish statutory requirements in a central electronic location, like the Federal Commons or refer to those maintained by the Federal Demonstration Partnership
- Require that a PL 106-107 working group develop a policy on certifications for incorporation into the appropriate government-wide document. It should require interagency coordination through the OMB for any new certification requirement that is not based in statute, with subsequent review and approval at the level of the agency head to ensure that there is a need for a certification, rather than an assurance.
- Require federal agencies to complete by 2001 the update of the government-wide common rules on drug-free workplace and suspension and debarment, through the Interagency Committee on Suspension and Debarment. The update must eliminate certification requirements that do not meet the criteria in the new government-wide policy described in Recommendation 1 above.

- Require that a PL 106-107 working group review the remaining government-wide certification requirement and recommend whether it should be replaced by an assurance.
- Require that agencies conduct a baseline review of their current use of certifications and assurances and provide the information within six months to the interagency working groups being formed to consider Public Law 106-107 implementation. The information will include the source of each requirement, basis (grant-by-grant or institutional), frequency (e.g., annual), and means (Standard Form SF-424, award term, or other). Requiring the each agency head to provide a justification for the continued use of each existing agency-specific certification, including an explanation of why an assurance will not serve.
- Expand the interagency demonstration of institutional, rather than grant-by-grant assurances and certifications currently being done under the Federal Commons, with its electronic repository of organizational profile data that includes institutional assurances and certifications.

Comments on Agency Reporting Requirements.

Financial reporting—

- NASA requires “Cash Receipts” and “Projections” for each project, even though this information is not required on SF272

Technical Reporting

NASA sometimes requires that copies of technical reports be sent to a number of locations.

Invention reporting—

- When an invention report is submitted via Edison, most agencies still require a signed, paper copy of the disclosure
- Only positive invention reports should be required
- DD-882 duplicates information already submitted on other invention reports

Army environmental compliance reporting is voluminous, and the statutory requirement upon which it is based needs to be re-evaluated.

-

B. Please identify specific data elements on these forms that you believe could be eliminated or combined to reduce reporting burden while still providing the Federal agency enough information to manage the program.

- See the recommendations under I.A—Application Forms

C. What programs do you think could share common application and reporting forms that currently do not? Do not limit your response to programs within the same agency. For example, if there are programs administered by the Department of Agriculture and the Department of Health and Human Services that you believe should share common forms because they share a similar purpose, please identify them.

FDP believes that all research programs could use the same application forms. R&D is a cluster for A-133 audit purposes. Reporting forms may have to vary by agency, depending on their objective in obtaining the reports. Any overhaul of technical reporting requirements should have faculty input.

D. How do you obtain copies of the forms you need for your grant? Are they readily available over the Internet, or are they provided in materials you received from your awarding agency, such as a funding notice or handbook? What forms have been difficult to locate in updated formats?

Obtaining application forms availability electronically isn't much of a problem. The continued use of paper forms that vary by agency is the larger issue. Designing proposal preparation systems that have to output information in specific page layouts for each agency is a major barrier to electronic commerce for grant applications.

Until electronic commerce is a reality, agencies could assume more responsibility for making their forms available electronically in common formats. Making forms available in PDF format meets the minimum need to make forms available to applicants. However, it's the functional equivalent of faxing or mailing forms to users, and having them roll them into typewriters, and type in the information. Only those institutions that have invested in developing interactive PDF forms can complete PDF forms without redundantly entering information.

II. Terms and Conditions

A. What terms and conditions are attached to your grants that you believe are not treated consistently from program to program, and across the various Federal agencies?

- Acknowledgment and disclaimer requirements. Some agencies exempt scientific publications from the disclaimer requirement, others do not.
- DEd continues to require the provisions of the Steven's amendment, though this statutory requirement was dropped several years ago.
- Data ownership. At least one agency (NSF) requires recipients to make their data available to other researchers, whereas most others agree that control of data resides with the recipient institutions.
- Cost allowability. PHS's cost allowability policy says that long distance calls are normally F&A Costs. A-21 says that monthly line charges should be F&A, but that toll calls can be charged directly.

- Interrelated projects. A-21 allows charging and transferring costs among interrelated Federal projects, but many agencies still require extensive up-front establishment of interrelatedness. It should be enough that institutions have the burden of demonstrating interrelationship when costs are questioned.
- Prior approvals for equipment. ARO continues to have a prior approval requirement for equipment items of \$5000 or more.
- Prior approvals for foreign travel. ARO continue to have a prior approval requirement for foreign travel.
- The DEd Office of Special Education issues some grants with a 10% rebudgeting restriction, while others have no such restriction
- Veterans Administration and Commerce/NIST intellectual property requirements are inconsistent with Bayh-Dole.

B. How would you suggest the agencies create more uniformity in these terms and conditions?

- The Federal government should use a set of common terms and conditions for particular kinds of awards made to similar organizations. For example, research financial assistance provided to educational and non-profit institutions should be governed by a set of terms and conditions like the FDP General Terms and Conditions. Agencies should have specific requirements for recipients it feels should be subject to more restrictive terms and conditions.
- Another set of terms and conditions is probably appropriate for large block grant programs to state and local governments.
- Construction and major facilities could have a set of terms and conditions, irrespective of the type of recipient.
- Awards for development of human capital, such as training grants and fellowships, could have a set of terms and conditions.

III. Payment Systems.

A number of FPD institutions provided responses to this section. These responses are found in Attachment 1. Having electronic systems probably maximizes the efficiency for the funding agencies, but when institutions have to have stand-alone systems for each payment system, they don't enjoy any efficiency. The proliferation of systems also makes it costly and inefficient to develop automated interfaces to all of these systems. Different institutions have different experiences with these payment systems. FDP plans to have a working group to parallel the Post-Award Working Subcommittee of the CFP Grants Management Council.

A. What payment systems are you currently required to use to receive grant payments? See Attachment 1.

B. Which of these systems offer on-line services? See Attachment 1.

One institution reported that NOAA payment systems have interactive forms, but the user cannot tell whether the submission was successful.

C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system? See Attachment 1.

IV. Audit Issues

A. What could the Federal agencies do to improve your understanding of the Single Audit process?

- Instructions to the auditors have not always been as clear they could be; however, auditors use other auditors as resources to come to understandings. In recent year many members of the audit community indicate that the federal government has made significant progress on a providing guidance to auditors. This effort is applauded and should continue. There is a subscription service available to the research administration community.

Examples of comments from some FDP institutions:

- There are still situations where federal auditors who are not the cognizant auditors visit campuses to audit their specific grants. We believe this is in direct contradiction to the intent of Circular A-133 that there be a single audit and that the cognizant agency will coordinate all federal audit work done at campuses. A specific situation described as follows represents a difficult problem:
- NSF refuses to pay DOD for the A-133 audits it performs DCAA. As a result, DCAA has excluded NSF funds from their compliance testing. As a result of this disagreement between these federal agencies, the institution in question was required to hire, at its own expense, an independent accounting firm to perform a separate audit of NSF funds. The institution does not recover the cost of this separate audit because they are over the 26% cap for F&A costs. FDP hopes this is an isolated situation, but it does raise question about the commitment to the single audit approach.
- The disconcerting aspect to the A-133 process is the occasional "disagreement" that happens at the IG's Offices as they seem to be trying to challenge the external audit firms. The federal agencies also fail to effectively use these audits to reduce their own grant closeout audits. Providing a reasonably sized listing of awards that the agencies would like to have reviewed during the A-133 audit would give all parties a better process.
- Explain why it is appropriate in the A-133 audit to audit the large research facilities construction costs given that these would already have been audited as part of the indirect cost proposal.

- Auditors seem to have inadequate guidance about the application of the same F&A rates throughout the life of the competitive segment of an award, especially when negotiated rates decline.
- Explain how to distinguish between material and non-material findings in the numerous compliance areas.
- Provide further guidance on subrecipient vs vendor relationships including monitoring requirements.

B. Have you used the Single Audit Clearinghouse to obtain information on subrecipient audits?

- A number of institutions do use the SAC for guidance; however, reports tell us that this information has not been as reliable as it should be. It is our understanding that work is ongoing to correct this deficiency. Despite the availability of the SAC, it is our understanding that while this service may provide preliminary information, institutions are not yet relieved of the responsibility of obtaining information directly from the subrecipient. It would be quite a time saving if institutions could utilize this and only be expected to follow up with subrecipients whose audits reflect problems or for whom there is not audit reflected.
- Some institutions report that they do not use SAC or that they only submit their own data.
- One institution reported that they use the SAC to determine whether a subrecipient has filed its audit with the Clearinghouse. If the audit has been filed, the institution follows up with the subrecipient to determine whether or not there are findings related to funds passed through from them. If the audit has not been filed, they try to ascertain when the submission will be made.
- The URL for the Single Audit Clearinghouse is not consistently available. The system seems to be unavailable on a frequent basis. The access should be checked for end user capability on a regular basis.
- The utility of the SAC could be improved by slight modifications to the SAC form. If Question 5 could be expanded to include the names of pass-through entities required to receive the report (a blank to be filled would be adequate), then a perusal of the SAC's for sub-recipients would alert an institution to ask for a copy of findings related to its awards. If the "search ability" of the SAC's could be improved, one could do a search to determine all the subrecipients where a pass-through entity needs to obtain the findings.

C. Do you believe that single audits provide appropriate audit coverage for your programs and the programs where you are a pass-through entity?

Since the 1996 revision of the major program definition, coverage has improved for programs under the \$3 million level. There are now fewer federal audits than there have been in the past, which represents significant timesavings for the institutions.

The SAC seems to provide appropriate coverage. If there is major weakness of the system it might be related to the quality of the audit.

Recommendations:

- Increase reliance of agencies on the single audit and reduce the number of “inspections” and program-specific audits
- Reduce overlap of F&A rate audits and single audits
- Provide better guidance about what constitutes materiality in a finding
- Enhance the SAC form to provide enough information for an institution to determine whether sub-recipients’ finding relates to its award.

V. Electronic Processing .

A. What electronic processing systems do you currently use for your Federal grants? Please note any systems you use due to Federal agency requirements, as well as any systems or technologies your organization uses for other activities.

Attachment 2, PL106-107 Electronic Systems, shows the systems that we know are out there, but we request that agencies document all grant related systems currently in production or in development.

(See Section III and Attachment 1 for payment systems)

FDP solicited reactions from faculty representatives about their experience with electronic systems from federal agencies. Most responded about their experiences with NSF's FastLane system. Nearly all were accepting of FastLane, some enthusiastically, and some grudgingly. One however, pointed out that FastLane effectively ruled out access to NSF funding by smaller, pre-college educational institutions. A large, multi-institution project found FastLane an extremely cumbersome vehicle for submitting proposals and reports. We will send the text of the faculty comments to NSF.

B. What is the likelihood that your organization would utilize an on-line application or financial reporting system?

As a condition of membership, FDP institutions and organizations are committed to implementing electronic research administration systems appropriate to their institutions. To this end, FDP has worked to develop standardized program announcements, organizational profiles, professional profiles, and core principles.

For a number of years, the federal agencies and universities involved in the Federal Demonstration Partnership have been working toward a common means for universities to transmit required information to, and receive information from, the multiple federal agencies that make and administer their research awards. The groundbreaking work done by the FDP agencies and universities toward a "common face" for electronic research administration can serve as the foundation for a broader initiative. That broader effort would create a uniform means to exchange information electronically with the federal agencies. The Federal Commons has emerged as the primary, and most promising, means of making the "common face" a reality. The ad hoc efforts of the FDP agencies and the voluntary work of agency representatives to the Interagency Electronic Grants Committee have been sufficient to shape the Federal Commons concept and promote informal, interagency discussion. However, if the concept is to become a government wide reality, more is needed, particularly in the identification of adequate resources to fully develop and deploy the Federal Commons. The first step is a formal, high-level commitment that the federal government will adopt the Federal Commons as the approach to electronic commerce with grant recipients. The second step is a clear assignment of the needed authority and responsibility to design and develop the system. The third step is the identification and subsequent dedication of the needed resources. Those resources include funding and people needed to develop the government-wide system, as well as deploy it within the individual federal agencies.

Recommendation:

We strongly recommend that the individual agency plans or the overarching all agency encompassing plan address the issue of the support of the Federal Commons. We encourage all agencies to cite their individual plans on how those agencies plan on providing the necessary resources required and cite a plan of internal development and deployment of systems that will be compatible with the Federal Commons. We also request that agencies identify all existing electronic systems and cite how these current initiatives interface with the Federal Commons development. Should an agency system not follow the "common face" roadmap for the Federal Commons, we request the system be revisited.

C. How can the agencies best prepare your organization for the future use of electronic processing option for your grants?

- **Lower the barriers by adopting common standards for electronic grant processes.**
- Undertake electronic systems development consistent with the **FDP Core Principles for Electronic Commerce in Grants Administration**, found in Attachment 3

- Continue to accept input from FDP institutions
- Continue FDP representation in IAEGC
- Inform FDP when systems are available for piloting.
- Offer external training.
- Make sure agency support team has extensive training.
- Electronic submissions should be voluntary vs. mandatory while system is still in production pilot mode.
- End users need a beneficial way to submit feedback.
- Provide continual updates to the community.
- Help desk support is a must.
- Announcement of systems well in advance. Use FDP to promote – as a vehicle for announcing, demonstrating, updating prior to systems being released.
- Program vs. agency. We discourage development and deployment of program based systems.
- Platform/software dependant. Think about what you are asking users to download/use before they can effectively use your system.
- Better on-line support/guidelines.
- Adhering to the core principles
- Agencies should consider beginning their electronic systems efforts with electronic awards, since that is a more manageable task than electronic proposals.

Additional Comments:

1. Standardized Funding Opportunity Announcements. The FDP has developed a standardized program announcement format that could serve as a model for financial assistance opportunities targeted to research organizations. This format assures that relevant program information, including CFDA number, is available for each funding opportunity. It also enables electronic grants system developers to incorporate this information into their implementations. Information about this format can be found at <http://fdp3.org/ps.html>
2. Electronic awards. The successful FDP pilot needs to be built upon by federal agencies and expanded to additional recipient institutions. This pilot is described at <http://fdp3.org/enmoa3.html>. Use of the electronic award format will go a long way towards standardizing award, including incorporation of terms and conditions and other requirements, such as reporting, payment, etc. The smaller institutions have a particular need for an award that includes financial and reporting schedules, since the small number of staff are not always knowledgeable about these requirements when they found only in the agency's grant regulations. The ultimate goal is computer-to-computer transmission of this information.
3. Subawards vs. procurement. The FDP subaward task force has produced a document that distinguishes between collaborative efforts between or among institutions, and

procurement of goods and services. This document can be found at <http://fdp3.org/subawardsfinalrevised.pdf>. Agencies should adopt this document as the basis for making this distinction.

4. Interim Reports and Plans. CFO Grants Management Committee Working Groups should agree to produce periodic reports on their 106-107 implementation efforts, and solicit comments from the recipient community. This also applies to further interim agency implementation plans.
5. Federal Commons. Each agency should publish how it intends to interoperate with the Federal Commons.
6. Agency Decentralization. Many of the inconsistencies in terms and conditions, and unilateral systems development arise because grant making activities are decentralized in many agencies. For a successful PL 106-107 implementation, this decentralization will have to be addressed by communication and training.

Attachment 1 – Payment Systems

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Respondent Name and address: **University of Cincinnati**
Cincinnati Ohio 45221

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	N/A		Yes, the burden on our financial system is significant. We must use different procedures/software to obtain the data from our accounting records. Training /cross training of staff is time consuming. Efficiency of work and cash flow is hampered.
Department of Commerce	<u>N/A</u>		
Department of Agriculture	Smartlink	Yes	
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	<u>Yes</u>	
Department of Energy	Smartlink	Yes	
Department of Health and Human Services	Smartlink	Yes	
Environmental Protection Agency	Fax	no	
Department of Interior	N/a	Yes	
Department of Housing and Urban Development (HUD)	Line of Credit Control System (LOCCS)Voice Response	No	
National Endowment for the Humanities	Faxed SF 270	No	
Department of Labor	<u>N/A</u>		
National Aeronautics & Space Administration	Smartlink	Yes	
National Science Foundation	Fastlane	Yes	

Respondent Name and address: **Cornell University**
Ithaca, New York 14853-2801

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	Smartlink	Yes	The burden of on our financial system seems to be indirect; the time consumed and the level of errors caused by the use of multiple systems affects the productivity of the person in charge of the draw-downs. The increased inefficiency of using 7, rather than the expected 2, payment management systems is not only an unrecovered loss, but also acts as a limit in this person's capabilities to participate in more productive tasks in the department.
Department of Commerce	<u>NOAA</u>	Yes	
Department of Agriculture	Smartlink	Yes	
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	<u>Yes</u>	
Department of Energy	Automated Standard Application for Payment (ASAP)	No	
Department of Health and Human Services	Smartlink	Yes	
Environmental Protection Agency	Automated Standard Application for Payments (ASAP)	No	
Department of Interior	Smartlink	Yes	
Department of Housing and Urban Development (HUD)	Line of Credit Control System (LOCCS)Voice Response	No	
National Endowment for the Humanities	Faxed SF 270	No	
Department of Labor	<u>Smartlink</u>	Yes	
National Aeronautics & Space Administration	Smartlink	Yes	
National Science Foundation	Fastlane	Yes	

Respondent Name and address:

Dartmouth College
 The Grants and Contracts Office,
 11 Rope Ferry Rd., Hanover, NH 03755

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	N/A		
Department of Commerce	<u>Financial Assistance Disbursement system (FADS) Internet</u>	<i>No</i>	
Department of Agriculture	Payment Management System (PMS) Web Site	Yes, 272 MAIL-IN	
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	<u>Yes, 272 Submittal</u>	
Department of Energy	Automated Standard Application for Payment (ASAP)	yes	
Environmental Protection Agency	Automated Standard Application for Payments (ASAP)	yes	
Department of Health & Human Services	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
Commission on National Community Services Within Higher Education	N/A		
Department of Housing and Urban Development (HUD)	N/A		
National Endowment for the Humanities	Faxed SF 270	No	
Department of Justice	Phone Activated Paperless Request System (PAPRS)	No	
Department of Labor	<u>N/A</u>		
National Aeronautics & Space Administration	Payment Management System (PMS) Web Site	Mail-in SF272	
National Science Foundation	Automated Standard Application for Payments (ASAP)	No	
Small Business Administration	Mail-in Voucher	No	

Respondent Name and address: **Harvard**
 1350 Massachusetts Ave.
 Cambridge, MA 02138

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	Payment Management System (PMS) Web Site	Yes, 272 Submittal	Yes, this causes the need to obtain the information needed in different formats based on the requirements of each agency.
Department of Commerce	<u>Financial Assistance Disbursement System (FADS) via Internet</u>	No	
Department of Agriculture	Payment Management System (PMS) Web Site	Yes, 272 Submittal MAILED OUT	
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	NO 272 REQUIRED	
Department of Energy	Automated Standard Application for Payment (ASAP)	No	
Environmental Protection Agency	Automated Standard Application for Payments (ASAP)	No	
Department of Health & Human Services	<i>Payment Management System (PMS) Web Site</i>	Yes, 272 Submittal	
Commission on National Community Services Within Higher Education	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
Department of Housing and Urban Development (HUD)	Line of Credit Control System (LOCCS)Voice Response	No	
National Endowment for the Humanities	Faxed SF 270	No	
Department of Justice	LOCES: LETTER OF CREDIT ELECTRONIC SYSTEM	No	
Department of Labor	<u>Payment Management System (PMS) Web Site</u>	Yes, 272 Submittal	
National Aeronautics & Space Administration	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
National Science Foundation	Automated Standard Application for Payments (ASAP)	YES 272 Electronically transmitted via FASTLANE	
Small Business Administration	Voucher Faxed	No	

Respondent Name and address: **Mass General Hospital**
 Research Management
 50 Staniford St.
 Boston , MA 02114

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	N/A		
Office of Naval Research	<u>EDI submission of SF 270</u>	No	
Department of Agriculture	Smartlink	Yes, 272 Submittal	
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	No	
Department of Energy	272 Mailed	Yes	
Environmental Protection Agency	N/A		
Department of Health & Human Services	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
Commission on National Community Services Within Higher Education	N/A		
Department of Housing and Urban Development (HUD)	N/A		
National Endowment for the Humanities	N/A		
Department of Justice	Phone activated paperless request system	No	
Department of Labor	<u>N/A</u>		
National Aeronautics & Space Administration	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
National Science Foundation	Automated Standard Application for Payments (ASAP)	YES 272 Electronically transmitted via FASTLANE	
Small Business Administration	N/A		

Respondent Name and address:

Massachusetts Institute of Technology
 77 Massachusetts Avenue
 Cambridge, MA 02139

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	Payment Management System (PMS) Web Site	Yes, 272 Submittal	Yes, this causes the need to obtain the information needed in different formats based on the requirements of each agency.
Department of Commerce	<u>Financial Assistance Disbursement System (FADS) via Internet</u>	No	
Department of Agriculture	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	<u>Yes, 272 Submittal</u>	
Department of Energy	Automated Standard Application for Payment (ASAP)	Yes, 272 Submittal	
Environmental Protection Agency	Automated Standard Application for Payments (ASAP)	No	
Department of Health & Human Services	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
Department of Transportation - Federal Aviation Administration	Electronic Clearing House Operation (ECHO) Web Site	No	
Department of Housing and Urban Development (HUD)	Line of Credit Control System (LOCCS)Voice Response	No	
National Endowment for the Humanities	Faxed SF 270	No	
Department of Justice	Phone Activated Paperless Request System (PAPRS)	No	
Department of Labor	<u>Payment Management System (PMS) Web Site</u>	Yes, 272 Submittal	
National Aeronautics & Space Administration	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
National Science Foundation	Automated Standard Application for Payments (ASAP)	Yes, 272 Submittal	

Respondent Name and address: **North Carolina State University**
 Sponsored Programs Research
 Room 22, Leazar Hall
 Raleigh, North Carolina 27695

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	Payment Management System (PMS) Web Site	Yes	
Department of Commerce	<u>Financial Assistance Disbursement System (FADS) via Internet</u>	Yes	
Department of Agriculture	Payment Management System (PMS) Web Site	Yes	Yes--See Note 1
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	<u>Yes</u>	
Department of Energy	Automated Standard Application for Payment (ASAP)	Yes	
Environmental Protection Agency	Automated Standard Application for Payments (ASAP)	Yes	
Department of Health & Human Services	Payment Management System (PMS) Web Site	Yes	Yes--See Note 2
Commission on National Community Services Within Higher Education	Payment Management System (PMS) Web Site		
Department of Housing and Urban Development (HUD)	Line of Credit Control System (LOCCS)Voice Response		
National Endowment for the Humanities	Faxed SF 270	No	See Note 3
National Aeronautics & Space Administration	Payment Management System (PMS) Web Site	Yes, 272 Submittal	See Note 4
National Science Foundation	Fastlane Application	Yes, 272 Submittal	
Small Business Administration	Voucher Faxed	No	
Office of Naval Research	EDI submission of SF270	<u>Yes</u>	

Note 1: USDA Forest Service system is not good. USDA FS wants NCSU to draw down by an agency sub account and NCSU is unable to enter it into our system. USDA FS should allow draw down by their agency grant number. This extra step should be handled internally by USDA FS and the burden should not be placed on the institution. This process is only for the grants coming out of the Northeastern Research Station. All of the grants coming out of the Southern Research office are paying invoices from NFC-- and that works well. USDA CSREES draws down on each individual account but the agency reference or agreement number is the number we draw down. This agency number can be entered into our accounting system and allows us to pull information from reports showing each account's cash balance. Allow draw down in lump sum.

Note 2: NCSU is a quarter behind (invoices last completed in December 2000) due to PMS system problems.

Note 3: Invoices are automatically generated by the NCSU financial system so the SF270 is in addition to our standard invoice.

Note 4: This system works great! We are not required to draw down by each individual account so the lump sum draw down is very efficient. We do report on each account via the 272 at the end of each quarter. This keeps paperwork to a minimum.

Recommendations: On-line tutorial services would make the system easier to use and allow new users the opportunity to familiarize themselves with the system(s).

Respondent Name and address:

Penn State University
 110 Technology Center Bldg
 University Park, PA 16802-000
 Research Accounting Office

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	Smartlink	Yes, 272 Submittal	Multiple systems require increased level of documentation in multiple formats.
Department of Commerce	<u>Financial Assistance Disbursement system (FADS) Currently Piloting ASAP</u>	No	
Department of Agriculture	Smartlink	Yes, 272 MAIL-IN	
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	<u>Yes, 272 Submittal</u>	
Department of Energy	Automated Standard Application for Payment (ASAP)	yes	
Environmental Protection Agency	Automated Standard Application for Payments (ASAP)	yes	
Department of Health & Human Services	Smartlink	Yes, 272 Submittal	
Commission on National Community Services Within Higher Education	N/A	No	
Department of Housing and Urban Development (HUD)	N/A	No	
National Endowment for the Humanities	Invoice Submission	No	
Department of Justice	Phone Activated Paperless Request System (PAPRS)	No	
Department of Labor	<u>N/A</u>		
National Aeronautics & Space Administration	Smartlink	Mail-in SF272	
National Science Foundation	Fastlane	No	
Dept of Interior	Invoice Submission Smartlink	No	
Federal Aviation Administration	ECHO	No	
Department of Army	Automatic Payment	n/a	
Department of Air Force	Automatic Payment	n/a	
Office of Naval Research	EDI Submission of 270	Yes	
Small Business Admin	Mail-in Voucher	No	

Respondent Name and address:

The Research Foundation of State University of New York
P.O. Box 9, Albany, New York 12201

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	Payment Management System (PMS) Web Site	Yes, 272 Submittal	Yes, this causes the need to obtain the information needed in different formats based on the requirements of each agency.
Department of Commerce	<u>Financial Assistance Disbursement System (FADS) via Internet</u>	No	
Department of Agriculture	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	<u>Yes, 272 Submittal</u>	
Department of Energy	Automated Standard Application for Payment (ASAP)	No	
Environmental Protection Agency	Automated Standard Application for Payments (ASAP)	No	
Department of Health & Human Services	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
Commission on National Community Services Within Higher Education	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
Department of Housing and Urban Development (HUD)	Line of Credit Control System (LOCCS)Voice Response	No	
National Endowment for the Humanities	Faxed SF 270	No	
Department of Justice	Phone Activated Paperless Request System (PAPRS)	No	
Department of Labor	<u>Payment Management System (PMS) Web Site</u>	Yes, 272 Submittal	
National Aeronautics & Space Administration	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
National Science Foundation	Automated Standard Application for Payments (ASAP)	No	
Small Business Administration	Voucher Faxed	No	

Respondent Name and address:

Texas A&M Research Foundation
P.O. Box 3578
College Station, Texas 77843

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Department of Agriculture	Payment Management System (PMS) Web Site	Yes, 272 Submittal	Please see note below
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	<u>Yes, 272 Submittal</u>	
Department of Energy	Request is faxed	No	
Environmental Protection Agency	Automated Standard Application for Payments (ASAP)	No	
Department of Health & Human Services	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
Agency for International Development	Smartlink	Yes	
Department of Housing and Urban Development (HUD)	Line of Credit Control System (LOCCS)Voice Response	No	
Department of Labor	Smartlink	Yes	
National Endowment for the Humanities	Faxed SF 270	No	
National Aeronautics & Space Administration	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
National Science Foundation	Fastlane Application	Yes, 272 Submittal	
National Oceanic Atmospheric Administration	<u>FADS</u>	<i>Yes</i>	
Office of Naval Research	EDI submission of SF270	<u>No</u>	

TAMRF NOTE:

The requirement from federal agencies to use multiple systems for requesting payments results in the institution having to purchase additional software, train staff to use multiple applications, safeguard a minion of log on id's and passwords, and maintain information in different formats based on the agency requirements.

TAMRF Recommendation:

For this purpose, FASTLANE systems are the easiest to use and we would like to see all others utilize something similar.

Respondent Name and address:

University of Rochester
 Box 270140
 Rochester, NY 14627

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	Payment Management System (PMS) Web Site N/A	Yes, 272 Submittal	Yes, this causes the need to obtain the information needed in different formats based on the requirements of each agency.
Department of Commerce	<u>SF 270</u>	No	
Department of Agriculture	Payment Management System (PMS) Web Site	No	
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	<u>Yes, 272 Submittal</u>	
Department of Energy	Automated Standard Application for Payment (ASAP)	Yes, 272 submittal	
Environmental Protection Agency	Automated Standard Application for Payments (ASAP)	No	
Department of Health & Human Services	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
Commission on National Community Services Within Higher Education	Payment Management System (PMS) Web Site N/A		
Department of Housing and Urban Development (HUD)	Line of Credit Control System (LOCCS)Voice Response	No	
National Endowment for the Humanities	Faxed SF 270	No	
Department of Justice	Phone Activated Paperless Request System (PAPRS) N/A		
Department of Labor	<u>Payment Management System (PMS) Web Site</u> N/A		
National Aeronautics & Space Administration	Payment Management System (PMS) Web Site	No	
National Science Foundation	Fastlane	Yes, Fastlane	
Small Business Administration	Voucher Faxed N/A	No	

Respondent Name and address:

University of Florida
Gainesville, FL 32611

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	Payment Management System (PMS) Web Site	Yes	The burden on our financial system includes the time consumed in maintaining multiple systems. Training and cross training for all the various systems requires extra time. Add'l time has been spent as 2 agencies have recently changed to ASAP (claiming that PMS is too expensive). The transition was not easy and was time consuming. PMS recently changed software and the qtrly reconciliation (SF272) is still in total disarray. We have not received the report for the quarter ended 12/31/2000. The report for the previous qtr had over 50 errors.
Department of Commerce	Financial Assistance Disbursement System (FADS) Web Site	Yes	
Department of Agriculture	Payment Management System (PMS) Web Site	Yes	
Department of Education	<u>Grant Administration and Payment System (GAPS) via web</u>	<u>Yes</u>	
Department of Energy	Automated Standard Application for Payment (ASAP)	No	
Department of Health and Human Services	Payment Management System (PMS) Web Site	Yes	
Environmental Protection Agency	Automated Standard Application for Payment (ASAP)	No	
Department of Interior	Payment Management System (PMS) Web Site	Yes	
Department of Housing and Urban Development (HUD)	Line of Credit Control System (LOCCS) voice response	No	
National Endowment for the Humanities	Faxed SF 270	No	
Department of Justice	<u>Mailed SF 270</u>	No	
Department of Labor	<u>Mailed SF 270</u>	No	
National Aeronautics & Space Administration	Payment Management System (PMS) Web Site Some branches not on PMS - require qtrly 272 mailed	Yes	
Department of Defense	ONR - Information Exchange System (IES) to draw	Yes	
	and EDI-Eagle to send	No	
	AFOSR - Mailed SF 270 ARO - Mailed SF 270 (unless preplanned schedule of pmts)	No	
National Science Foundation	Fastlane	No	

Respondent Name and address:

The University of North Carolina at Chapel Hill
 Office of Contracts and Grants
 440 West Franklin Street, CB# 1350
 Chapel Hill, NC 27599-1350

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	Payment Management System (PMS) Web Site	Yes, 272 Submittal	Yes, See note below.
Department of Commerce	<u>Financial Assistance Disbursement System (FADS) via Internet</u>	No	
Department of Agriculture	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	<u>Yes, 272 Submittal</u>	
Department of Energy	Automated Standard Application for Payment (ASAP)	No	
Environmental Protection Agency	Automated Standard Application for Payments (ASAP)	No	
Department of Health & Human Services	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
Commission on National Community Services Within Higher Education	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
Department of Housing and Urban Development (HUD)	Line of Credit Control System (LOCCS)Voice Response	No	
National Endowment for the Humanities	Faxed SF 270	No	
National Aeronautics & Space Administration	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
National Science Foundation	Fastlane Application	Yes, 272 Submittal	
Small Business Administration	Voucher Faxed	No	
Office of Naval Research	EDI submission of SF270	<u>No</u>	

NOTE:

The requirement from federal agencies to use multiple systems for requesting payments results in the institution having to purchase additional software, train staff to use multiple applications, and maintain information in different formats based on the agency requirements.

Recommendation:

All federal agencies be required to use PMS or ASAP.

Respondent Name and address:

University of California, Los Angeles
 UCLA Wilshire Center
 10920 Wilshire Blvd., 5th Floor
 Los Angeles, CA 90024

<i>FEDERAL SPONSORING AGENCY NAME</i>	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	Currently inactive (No active awards)		So far, we have not experienced any problem using the multiple payment systems. However, if federal agencies will be required to use either PMS or ASAP, it will significantly facilitate the process, thus increasing productivity. Training for new person/back-up will be easier and faster.
Department of Commerce	<u>Financial Assistance Disbursement System – Web Site</u>	Yes	
Department of Agriculture	Payment Management System (PMS) Web Site	Yes	
Department of Education	<u>E-Payments (Formerly GAPS) Web Site</u>	<u>Yes</u>	
Department of Energy	Bi-weekly cash requests faxed to University of California Office of the President	No	
Environmental Protection Agency	Automated Standard Application for Payments (ASAP)	No	
Department of Health & Human Services	Payment Management System (PMS) Web Site	Yes	
Department of Transportation - Federal Aviation Administration	Request for Advance and Reimbursement (SF270) and Inter-campus Billing	No	
Department of Housing and Urban Development (HUD)	Line of Credit Control System (LOCCS) Voice Response	No	
National Endowment for the Humanities	Faxed Monthly SF270	No	
Department of Justice	Phone Activated Paperless Request System (PAPRS)	No	
Department of Labor	<u>Payment Management System (PMS) Web Site</u>	Yes	
National Aeronautics & Space Administration	Payment Management System (PMS) Web Site	Yes	
National Science Foundation	<u>Fastlane – Web Site</u>	Yes	
Office of Naval Research	<u>EDI submission of SF270</u>	<u>No</u>	
United States Information Agency	<u>Payment Management System (PMS) Website</u>	Yes	

Respondent Name and address:

University of Wisconsin - Madison
 321 Bascom Hall
 Madison, WI 3706

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	Payment Management System (PMS) Web Site	Yes, 272 Submittal	Yes, this causes the need to obtain the information needed in different formats based on the requirements of each agency.
Department of Commerce	<u>Financial Assistance Disbursement System (FADS) via Internet</u>	No	
Department of Agriculture	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	<u>Yes, 272 Submittal</u>	
Department of Energy	Automated Standard Application for Payment (ASAP)	No	
Environmental Protection Agency	Automated Standard Application for Payments (ASAP)	No	
Department of Health & Human Services	Electronic Upload of file via Payment Management System (PMS) Web Site	Yes, 272 Submittal	
Commission on National Community Services Within Higher Education	N/A		
Department of Housing and Urban Development (HUD)	Line of Credit Control System (LOCCS)Voice Response	No	
National Endowment for the Humanities	Faxed SF 270	No	
Department of Justice	Phone Activated Paperless Request System (PAPRS)	No	
Department of Labor	<u>Direct Invoice</u>		
National Aeronautics & Space Administration	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
National Science Foundation	Automated Standard Application for Payments (ASAP)	No	
Small Business Administration	Voucher Faxed	No	

Respondent Name and address:

U.T. Southwestern Medical Center
 5323 Harry Hines Blvd.
 Dallas, TX 75390-9020

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	Yes	Yes, this causes the need to obtain the information needed in different formats based on the requirements of each agency.
Department of Energy	Manual Invoice	No	
Department of Health & Human Services Food & Drug Administration	Payment Management System (PMS) Web Site Manual Invoice	Yes Yes	
Department of Defense	Manual Invoice	No	
Department of Justice	Payment Management System (PMS) Web Site	Yes	
Department of Treasury	<u>Manual Invoice</u>	No	
National Aeronautics & Space Administration	Payment Management System (PMS) Web Site	Yes	
National Science Foundation	Fastlane	Yes	
Veterans Administration	Manual Invoice	No	

Respondent Name and address:

University of Pennsylvania
 Office of Research Services
 Mezzanine
 133 South 36th Street
 Philadelphia, PA 19104-3246

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	Payment Management System (PMS) Web Site	Yes	See note below.
Department of Commerce	<u>Financial Assistance Disbursement System (FADS) via Internet</u>	Yes	
Department of Agriculture	Payment Management System (PMS) Web Site	Yes	
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	<u>Yes</u>	
Department of Energy	Automated Standard Application for Payment (ASAP)	Yes	
Environmental Protection Agency	Automated Standard Application for Payments (ASAP)	<u>Yes</u>	
Department of Health & Human Services	Payment Management System (PMS) Web Site	Yes	
Commission on National Community Services Within Higher Education	Payment Management System (PMS) Web Site	Yes	
Department of Housing and Urban Development (HUD)	Line of Credit Control System (LOCCS)Voice Response	Yes	
National Endowment for the Humanities	Faxed SF 270	No	
National Aeronautics & Space Administration	Payment Management System (PMS) Web Site	Yes	
National Science Foundation	Fastlane Application	Yes	
Small Business Administration	Voucher Faxed	No	
Office of Naval Research	EDI submission of SF270	<u>Yes</u>	

NOTE:

The use of multiple payment systems increases both the amount of time to request funds and the possibility of error. It would seem that a uniform system of payment request for Federal agencies would make the process much more efficient.

Recommendation:

Federal agencies adopted a system similar to Fastlane.

Respondent Name and address:

University of Virginia
P.O. Box 400195
Charlottesville, VA 22904-4195

What payment systems are you currently required to use to receive grant payments? and Which of these systems offer on-line services?

We think the schools that have already responded to you do a fine job in listing the agencies that require systems; yes, we use all the systems identified therein. Our concern is more global in nature. We think the government already has a good idea of what they require of their grant recipients; our concern is that they are NOT consistent in WHAT they require. This observation applies to both their paper forms for gathering information as well as to their "online" systems where they exist. To us, the bigger issues are indeed what 106/107 is trying to address, that is, consistency, ease of use and efficiency for both government agencies and the recipients of government funds.

Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?

This is the crux of the problem for us, is not only with respect to the payment systems but also with the proposal systems. The suggested approach of 2 financial systems, PMS and ASAP, is good in theory. Of course, until we have fully implemented those 2 payment systems across ALL federal agencies, theory is all we have. We also like the theory behind the FEDERAL COMMONS. Unfortunately, that idea has NOT come to fruition nor has it moved as fast as we would have liked.

From our perspective, the "electronic" moves made by the FEDS so far have been cumbersome, burdensome and confusing. While you will never hear us object to progress, it would be nice if it were across the board progress with movement in the same direction. You have FASTLANE and DOE and Dept. of ED choosing web systems, BUT implementing the systems in different ways. FASTLANE has taken institutional authority into consideration with regard to notifications, routing etc.; DOE and ED have not. What NSF identifies as an authorizing official (AO) may not be the same for DOE or ED. Each system may have totally different functionality and meaning established for an AO. Terms are NOT even used in the same manner, which anyone trying to use multiple systems finds confusing.

At a minimum a standard terminology dictionary would be nice. There should be one definition for AO across ALL federal agencies. This would then ensure that AO for NSF would have the same authorities as an AO at NIH or ED. It would make delegating that authority within our institution more Consistent and feasible.

Not only are the designs and platforms for these systems different, i.e. web vs. dialup vs. paper etc., the implementation of these systems is also different. Several of the new systems are requiring specialized software and some sort of manipulation of desktop computers, which end-users may or may not be able to perform.

It has been our experience that the costs and burdens seem to arise in the following three areas:

1. personnel;
2. efficiency; and
3. service.

Personnel -- it now takes specialized computer people in sponsored programs to handle all of the ERA issues; it also requires a new IT skillset for everyone involved, starting with the PI.

Efficiency -- it now takes longer to get things done; more people have to be involved, more training and coordination has to occur, more time required to process the information.

Service -- less time for "hand holding" and customer service types of Activities for PI's, since everyone is tied up trying to understand all the systems and their individual requirements. Forget about streamlining our own processes, we are trying to survive those imposed upon us.

While technology should be helping to improve efficiency and productivity in the workplace, i.e. streamlining, it can only do so if utilized effectively and deployed wisely.

University of Virginia (cont):

To summarize, we strongly encourage the FEDS to "go electronic" BUT they should not operate in a narrow vacuumed tunnel, nor should they move on an unrealistic timeframe. To us, the "big picture" is being missed because there are too many divergent views of what the big picture is. There needs to be some sort of organized, if not unified, approach (project plan) to ERA.

We encourage the FEDS to utilize and embrace the concept of the Federal Commons for proposal, award, and reporting purposes. From a recipient's point of view the more "common" the approach the more efficient and less burdensome it will be for all parties involved. It is important to note that our goal is to encourage research and researchers; most of our researchers are both applying for and receiving funds from, more than one source on a regular basis and our mission is to help not hinder that process.

Respondent Name and address: **University of Illinois**
 Champ aign, Illinois 61821

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	Payment Management System (PMS) Web Site	Yes	No active accounts for a long time.
Department of Commerce	<u>Financial Assistance Disbursement System (FADS) via Internet</u>	<u>Yes</u>	Easy to use, but no good way to automate data entry.
Department of Agriculture	Payment Management System (PMS) Web Site	Yes	Not as easy to operate as the old system, and no good way to automate.
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	<u>Yes</u>	Having to draw by individual grants is more time consuming than the previous PMS system. No good way to automate.
Department of Energy	Automated Standard Application for Payment (ASAP)	Yes	Not as easy to operate as the old system (PMS), and no good way to automate.
Environmental Protection Agency	Automated Standard Application for Payments (ASAP)	No	ASAP is not very user friendly.
Department of Health & Human Services	Payment Management System (PMS) Web Site	Yes	Works very well until recent problem at NIH with the 272's
Commission on National Community Services Within Higher Education	Payment Management System (PMS) Web Site		
Department of Housing and Urban Development (HUD)	Line of Credit Control System (LOCCS)Voice Response	?	I don't know if they offer electronic options. We haven't had any HUD awards in along time.
National Endowment for the Humanities	Fax draw requests	No	This works fine the total activity is not large enough to cause problems
National Aeronautics & Space Administration	Payment Management System (PMS) Web Site	Yes	Easy to use, but not to automate.
National Science Foundation	Fastlane Application	Yes	No problems, except that the cash doesn't arrive the same day.
Small Business Administration	Voucher Faxed		

Office of Naval Research

EDI submission of SF270

Yes

Easy to use.

NOTE: Recommendation: Fully implement the law requiring all civilian agencies to use PMS or ASAP. Encourage DOD to develop a pooled payment system.

Respondent Name and address: University of Nebraska-Lincoln

303 Admin Bldg.
Lincoln, NE

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	Payment Management System	Yes	<p>Yes—see comments here and below.</p> <p>In January, the EPA and the Department of Energy required that we install a modem to request cash payments under the ASAP system. However, only one of approximately 20 awards with these agencies was affected.</p> <p>In general, the University of Nebraska-Lincoln is pleased with the Payment Management System.</p>
<i>Department of Agriculture</i>	<u>Payment Management System</u>	Yes	
Department of Commerce	<u>Two different systems—one for SBA, one for NOAA</u>	No	
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	<u>Yes</u>	
Department of Energy	Automated Standard Application for Payment (ASAP)	No	
Department of Health and Human Services	Payment Management System	Yes	
Environmental Protection Agency	Automated Standard Application for Payments (ASAP)	No	
Department of Interior	Payment Management System	Yes	
Department of Justice	PAPRS	No	
National Endowment for the Humanities	Faxed SF 270	No	
National Endowment for the Arts	<u>Faxed SF 270</u>	No	
National Aeronautics & Space Administration	Payment Management System	Yes	
National Science Foundation	FastLane	Yes	

Multiple systems necessitate UNL to train individuals in different methods to accomplish essentially the same task.

Federal Agencies do not always provide uniform information on electronic payments. In the State of Nebraska, electronic payments are routed through the State Treasurer’s office. Payments that lack sufficient detail to determine ownership, such as invoice number, grant award number or investigator are manually routed to each state agency to determine ownership.

Respondent Name and address: **Northwestern University**
633 Clark Street
Evanston, IL 60208

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	N/A		Yes, See note below.
Department of Commerce	<u>Faxed SF270</u>	No	
Department of Agriculture	Payment Management System (PMS) Web Site	Yes, 272 Mailed	
Department of Education	<u>Grant Administration and Payment System (GAPS) via Internet</u>	<u>Yes</u>	
Department of Energy	Automated Standard Application for Payment (ASAP)	No	
Environmental Protection Agency	<u>Faxed SF 270</u>	No	
Department of Health & Human Services	Payment Management System (PMS) Web Site	Yes, 272 Submittal	
Commission on National Community Services Within Higher Education	N/A		
Department of Housing and Urban Development (HUD)	Line of Credit Control System (LOCCS) Voice Response	No	
National Endowment for the Humanities	Faxed SF 270	No	
National Aeronautics & Space Administration	Payment Management System (PMS) Web Site	No	
National Science Foundation	Fastlane Application	Yes, 272 Submittal	
Small Business Administration	N/A		
Office of Naval Research	EDI submission of SF270	<u>No</u>	

C. The use of multiple payment systems by Federal agencies causes a heavy burden due to the unique requirements of each system.

**Attachment 2
Existing Federal Electronic Systems**

PL 106-107 Draft Plan

Federal Agencies	Funding Opportunities	Proposal Preparation & Submission	<u>Award</u>	Continuation	Reports	Payments	Comments
AID							
Corp. for Nat'l & Community Service							
Dept. of Agriculture							
Dept. of Commerce							
Dept. of Defense							
ASSIST							
EDA – DISA/FDAS							
ONR			AwardWeb		AdminWeb		Notification Only
Dept. of Education							
e-Grants		e-Application			e-Reports	e-Payments	
Dept. of Energy		IIPS			e-Links		
Dept. of HUD							
Dept. of Interior							
Dept. of Justice							
GMS	X	X	X*		X*	X*	*Shows tabs for these systems but no written info. on these

Attachment 2 Existing Federal Electronic Systems

Federal Agencies	Funding Opportunities	Proposal Preparation & Submission	<u>Award</u>	Continuation	Reports	Payments	Comments
Dept. of Labor							
Dept. of State							
Dept. of Treasury							
Dept. of Veterans Affairs							
DHHS							
NIAID							
NIH - Commons							
Dept. of Transportation							
USEGS							Pilot testing ended 3/99. No further information on web.
EPA							
FEMA							
NASA							
SYS-EYFUS		X					
STScI GMS				X	X		
NIAC		X					Email submission
Nat'l Fdn. on the Arts & Humanities							

Attachment 2 Existing Federal Electronic Systems

Federal Agencies	Funding Opportunities	Proposal Preparation & Submission	<u>Award</u>	Continuation	Reports	Payments	Comments
NSF							
FastLane		X	X	X	X		
Small Business Administration							
Social Security Administration							

last updated 2/13/01

Attachment 3

Core Principles for Electronic Commerce in Grants Administration

EXECUTIVE SUMMARY

These core principles reflect the functional specifications recommended for inclusion in all eRA systems that involve or represent research institutions in a substantial, formal or legally binding way.

While general in nature, these core principles are primarily directed to (public and private) organizations that sponsor research. These core principles provide summary of those issues that are important to the Federal Demonstration Partnership (FDP); the FDP encourages sponsors that are designing, developing or deploying eRA systems to carefully consider these principles. Sponsors developing eRA systems are also invited to begin a dialog about these principles or their specific plans with the FDP.

The FDP recognizes that, in the case of several of these principles, there are technological and/or resource limitations that prevent full adherence to a given principle. In these cases the FDP recommends that procedural “work arounds” be developed; nevertheless, we urge that these principles be followed to the maximum extent practicable.

As the overarching standard, we believe that all agency eRA system development initiatives should meet the system requirements for seamless implementation within the Federal Commons

- **Principle 1:** The interests of the funding entities, recipient organizations, and general public are best served when initiatives that involve electronic interactions between a federal funding entity and recipient organization are undertaken within the context of the implementation of PL 106-107
- **Principle 2:** Consultation with recipients early in system development increases both utility and satisfaction
- **Principle 3:** Interoperable systems for the electronic exchange of data in support of grants administration processes are possible only when government-wide data standards, such as the ANSI X-12 transaction sets are used
- **Principle 4:** The promise of electronic commerce in grants administration depends on each funding entity and recipient organization implementing one of the approved data exchange mechanisms.
- **Principle 5:** Funding entities must respect recipient organizations’ need to know what is being proposed by individuals and groups within the organization, and the role organizations play in providing quality control over proposal submissions, and monitoring deliverables
- **Principle 6:** Data should be collected once, at its inception, without redundant data entry
- **Principle 7:** Electronic data must be secure from unauthorized access during transmission, storage, and subsequent use by the funding entity

Attachment 3

Core Principles for Electronic Commerce in Grants Administration

- **Principle 8:** The utility of systems to be used by recipients is greatly enhanced when the systems are pre-loaded with as much funding agency legacy data as possible.
- **Principle 9:** Data integrity is essential
- **Principle 10:** System performance must be adequate for the processes and applications supported
- **Principle 11:** Funding entities are responsible for providing training and support of recipient organization personnel

Attachment 3

Core Principles for Electronic Commerce in Grants Administration

Principle 1: The interests of the funding entities, recipient organizations, and general public are best served when initiatives that involve electronic interactions between a federal funding entity and recipient organization are undertaken within the context of the implementation of PL 106-107

- Electronic systems that maximize convenience to a single department, agency, or program without contributing to a government-wide solution should not be initiated
- Any such programs already in existence should have a plan for converting to one of the government-wide solutions
- Whenever possible, funds that would have been expended for a non-standard solution should be redirected toward a government-wide solution

Advantage to funding entities:

• avoids costs of one-of-a-kind solutions by leveraging inter-agency efforts

Advantage to recipient organizations::

• avoids need to learn to utilize a support a plethora of electronic commerce solutions

- **Principle 2:** Consultation with recipients early in system development increases both utility and satisfaction

- The FDP 106-107 committee has reviewed several systems that have not been developed with recipient community consultation, and they do not address the needs of the recipient community.
- Consultation can and should include beta testing with volunteer partners from the recipient community.

Advantage to funding entities:

• improve the quality of service and systems

Advantage to recipient organizations:

• reduced workload

- **Principle 3:** Interoperable systems for the electronic exchange of data in support of grants administration processes are possible only when government-wide data standards, such as the ANSI X-12 transaction sets, are used

- Funding entities should refrain from requiring data that is not included in the government-wide data standards
- Data definitions should be standard across funding entities, such that any given data element means the same thing for all funding entities
- Where non-standard data is required by statute, funding entities should devise a mechanism for collecting this data that doesn't compromise the use of data standards (e.g., collect the information as part of the narrative enter this information into internal funding entity systems as necessary)

Attachment 3

Core Principles for Electronic Commerce in Grants Administration

- Funding entities should take into account the time and expense incurred by recipient organizations when there are changes to the data standards

Advantage to funding entities:

Ö *allows use of shared, government-wide systems*

Advantage to recipient organizations:

Ö *allows the use of one system for all federal funding entities*

- **Principle 4:** The promise of electronic commerce in grants administration depends on each funding entity and recipient organization implementing one of the approved data exchange mechanisms.
 - Funding entities should provide recipients the option to use any one of the approved data exchange mechanisms, and use the Federal Commons for transactions that use an exchange mechanism other than that supported by the entity
 - Recipient organizations must commit to the use of one of the approved data exchange mechanisms
 - Business-to-business transactions are appropriate for funding entities and recipients who have a sufficiently large number of grants to merit the investment in electronic grants administration systems
 - Consumer-to-business transactions are appropriate for funding entities or recipients with smaller volumes of grants
 - Electronic submissions are in lieu of paper, not in addition to

Advantages to funding entities and recipients:

Ö *Each can use the transmission mechanism most appropriate to their needs, and*

Ö *Electronic transmission eliminates the need for most paper*

Ö *Provides an electronic record of the transaction*

- **Principle 5:** Funding entities must respect recipient organizations' need to know what is being proposed by individuals and groups within the organization, and the role organizations play in providing quality control over proposal submissions, and monitoring deliverables
 - Electronic systems should incorporate institutional approval of proposals, and should provide access to technical report submissions
 - The electronic identity of the authorized institutional officials has to be established and used
 - Any statutorily mandated, proposal-specific assurances, representations, or certifications can be provided only when the organization is involved in the submission process

Attachment 3

Core Principles for Electronic Commerce in Grants Administration

Advantages to funding entities:

- √ *Ineligible proposals do not reach the funding entity,*
- √ *Appropriate assurances, representations, or certifications are obtained, and*
- √ *The assistance of recipient organizations is obtained for monitoring deliverables*

Advantages to recipient organizations:

- √ *Recipients are not placed in the position of choosing between accepting awards based on proposals it would not have supported (at least not without revisions) and standing between a principal investigator and her/his funding.*
- √ *Organizational approval of proposals reduces the negotiation necessary to reach agreement after an award is made*
- √ *Recipients have the information necessary to address delinquency of technical reports before funding to other investigators is threatened or audit findings are reported*

- **Principle 6: Data should be collected once, at its inception, without redundant data entry**

- Data ought to be entered only once and updated as needed, by the designated person(s) at the responsible organization authorized to provide it. The submitting organization is the entity responsible for assigning responsibility and authority to its individuals within the context of the roles agreed to by the parties. Once entered, data may be updated only in accordance with established standards (e.g., proposal data may not be updated after a submission deadline except for administrative corrections and with the consent of the affected agency).

Advantage to funding entities and recipient organizations:

- √ elimination of redundant data entry

- **Principle 7: Electronic data must be secure from unauthorized access during transmission, storage, and subsequent use by the funding entity**

- Security has to be provided to protect the technical narrative of proposals, demographic information, proprietary information, and other information protected under law

Advantage to funding entities and recipient organizations:

- √ *Providing data security enables all parties to avoid the liability associated with failing to observe legal requirements for protecting personal and technical information.*
- √ *Research results and ideas are safe from misappropriation by unscrupulous individuals and organizations*

Attachment 3

Core Principles for Electronic Commerce in Grants Administration

- **Principle 8:** The utility of systems to be used by recipients is greatly enhanced when the systems are pre-loaded with as much funding agency legacy data as possible.

Advantage to funding entities and recipient organizations:

√ *elimination of redundant data entry*

- **Principle 9:** Data integrity is essential
 - Data transmission has to be confirmed as accurate and complete
 - The source and content of the transmission has to be non-refutable
 - Where funding entity actions are based on graphical information, such as a technical proposal narrative or report that includes images or other graphics, the funding entity must assure that it does not allow images to be degraded in a way that could result in decisions adverse to the recipient.

Advantage to funding entities and recipient organizations:

√ *A high degree of data integrity increases the extent to which both faculty and program personnel rely on the system, rather than resorting to paper*

√ *Reduces the probability that deserving research goes unfunded because of poor or inaccurate representation*

- **Principle 10:** System performance must be adequate for the processes and applications supported

- System capacity sufficient to handle peak loads
- System response time is acceptable

Advantage to funding entities and recipient organizations:

√ *A high degree of system reliability increases the extent to which both faculty and program personnel rely on the system*

√ *A reliable system avoids problems with making exceptions for late proposals, reports, etc.*

- **Principle 11:** Funding entities are responsible for providing training materials and support of recipient organization personnel

- There is a help desk, or equivalent means for providing ready assistance to users
- There are training materials and training opportunities
- There is documentation and instructions for users

Advantage to funding entities and recipient organizations:

√ *Training and support increase user efficiency*