

PL 106-107 Comments from the University of Wisconsin-Madison

Attn: Department of Health and Human Services
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I. Application and Reporting Forms

A. Please identify application and reporting forms you believe could be improved or streamlined.
The Federal Demonstration Partnership (FDP) Subcommittee on Integrated Performance Standards is working with the National Science Foundation to standardize and test the business rules and performance standards within funding announcements for electronic transmission to university electronic research management systems and funding opportunity databases. We support this effort and encourage all Federal agencies to work towards adopting a the standard developed by the FDP. In addition we recommend development of a standard grant application cover page, with addenda to collect information that specific agencies require. Likewise, reporting forms should have a standard format.

Until that can be accomplished we suggest the following recommendations to improve agency forms:

Department of Health and Human Services

We would like to see more standardization within the NIH Institutes. Internally, each Institute has different methods of requesting additional information, requirements on what is acceptable for human subjects training, methods to verify human subjects protocol approval, etc. Also, there should be a standard format created for progress reports.

DHHS HCFA is more restrictive and uses different forms than the NIH. It would be helpful if they would adopt NIH policies and procedures.

PHS 398 application information should include additional instructions for preparing NIH institutional national research service award applications (T32 training grants). Also, the application process for these training grants needs to be streamlined. The documentation requested for training grant applications is very onerous to gather, and results in a huge application, particularly for large, interdepartmental training programs. A recent application submitted by the University of Wisconsin was more than 700 pages long. We believe that fewer data, and some data presented only in summary would make the application easier to compile and easier to review in a meaningful way. All of the requested tables could be examined to determine what is essential, but we have a few specific suggestions:

Within the Research Training Program Plan, information requested on Program faculty, there are two categories that are particularly difficult.

1. Active and pending research support: Would it be reasonable to skip this table, and instead request the three page format biographical sketch used in the modular applications that includes information about "research projects completed or ongoing in the last three years?" Faculty are already preparing information in this format for their own research grants.

2. Past and current students for whom the faculty member has served, or is serving, as sponsor: Is all of this detail necessary, even for students and postdocs who were not supported on this training grant? It is difficult to obtain accurate information on past students and postdocs. If it really is useful information, we suggest development of a national database to maintain this information.

Within the Trainee Candidates category:

1. Qualifications of prospective predoctoral trainees: This becomes an enormous table for large programs, and particularly for large interdepartmental programs. For one of our recent applications, there were 1643 applicants for associated programs. Would summary information (i.e., average GPAs and GREs, aggregate numbers of minority applicants, etc.) be sufficient?

Department of Education

We are concerned about Dept. of Education requirement for responses to in-depth questions regarding human subjects. This leads to second guessing IRB determinations, and is inconsistent with other agencies. See <http://ocfo.ed.gov/grntinfo/appforms.htm>, (attached to Form 424) for example.

Dept. of Education requires institutional sign-off on annual progress reports, which other agencies do not require creating an additional processing burden. Also, we suggest that all Dept. of Education application forms share a common cover sheet.

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.

The EDI transaction set for grant or assistance applications (194) represents the common data elements for grant proposal submission. These standard elements should be used by all Federal agencies to reduce the burden.

C. What programs do you think could share common application and reporting forms that currently do not?

Again, FTP's Integrated Performance Standards Subcommittee is working toward a shared application for development within the Federal Commons. NSF already has done a good job in standardizing program announcements and creating a standard electronic proposal submission and reporting process (FastLane). Other agencies should follow NSF's model through the Federal Commons idea. Until this is accomplished, we recommend that a standard federal application kit be developed, or standard forms such as #424, for applications to the following agencies that do not currently have standardized forms: NASA, Peace Corps, Veterans Administration, DOD, (Army, Navy, AF), AID, HUD, EPA, Labor, SBA, Department of the Interior, Department of Transportation, Department of Commerce.

All Federal agencies should maintain institutional profiles rather than requiring certifications and representations on each proposal or award. The FDP had a task force work on this in 1996 and their suggestions should be incorporated into the Federal Commons (<http://fdp3.org/ipdoc01.html>).

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?

We obtain most electronic forms over the Internet either directly from the funding agency or through the Texas Research Administrators Group (TRAM). TRAM (<http://tram.east.asu.edu/>) contains a set of grant application forms collected from various sources, as well as standard agreements for subcontracts, non-disclosures, licenses, and links to other servers related to research funding and administration. Standard PHS forms are also obtained in paper form from PHS and distributed by the Research and Sponsored Program Directors office.

We suggest a "forms" button at the home page for each agency. All forms that the agency requires should be consolidated and accessible from this button, so applicants don't have to drill down to find necessary forms and information. Alternatively, a central clearinghouse for Federal Forms via the Web could provide links to forms sites. Forms should be available in a variety of formats including MSWord, PDF, and MAC compatible format.

When listing forms electronically, it's important to have descriptive names as well as numbers to facilitate locating the necessary form.

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?

Items requiring prior approval by agencies should be the same for all federal agencies.

We would like to see a consistent manner by which agencies identify whether cost sharing is required at the time of proposal and at what percent of total costs. In addition, at the award stage there should be a clear and consistent statement specifying the required amount of cost-sharing.

Federal agencies are extremely inconsistent regarding the use of unrecovered F&A costs for cost sharing. OMB Circular A-110 allows Federal Agencies this latitude. The Office of Management and Budget recently supported the Department of Agriculture's position that the difference between a university's negotiated F&A rate and the rate allowed was an unallowable cost and, therefore, could not be used for cost sharing. If the Federal Agency will not reimburse a university's actual F&A costs, they should not add to the funding burden by not allowing the University to use those costs as cost sharing.

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

FDP's Term and Conditions Subcommittee has been working towards developing a core set of common terms and conditions that each program could use in a checklist style for consistency. Agency specific terms and conditions could be added to this core list as an addendum, but should be kept to a minimum. Legislation should be introduced to Congress when appropriate to further this goal (by OMB or another agency). A five or ten year review of all agency specific terms and conditions should also be required to assure outdated requirements are eliminated .

III. Payment Systems

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

We are currently drawing down funds from the Federal Government using several different methods. AID, Interior-USGS, NASA and USDA are currently using DPM's SMARTLINK System. DED has the EDGAPS System, while HUD uses their own Line of Credit Control System (LOCCS). Commerce also has their own system for Cash Requests Financial Assistance Disbursement System (FADS). DOE and EPA use ASAP. NEH has a completely manual system-Vendor Express-for drawing down funds. We are currently working with DHHS to create an automated upload of our quarterly report into their new web-based system. See attached summary chart.

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

SMARTLINK and ASAP, PMS, along with EDGAPS offer some on-line capabilities. The information that you can get from the systems is not easy to access, and in some cases is not timely.

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

Yes, the multiple payment systems currently used by Federal agencies create a burden on our financial grant management systems. As a large research University, UW-Madison has a large number of accounts per federal agency. We are constantly challenged to use our central financial system to generate all the variations of reports required by individual agencies. Our largest extramural sponsor, NIH, has been revising their Payment Management System (PMS) for over two years. We have spent a great deal of time testing their new system, but since last spring, we have not had an accurate process for quarterly reporting.

The payment option for advanced payments exercised primarily by DOD, causes an additional burden. The federal sponsor sets up a payment schedule, then sends the funds based on that arbitrary timeline. It places a burden on the grantee because it forces us to calculate interest generated on the advances. The schedule has no relevance to the actual disbursement of funds spent in the course of the project.

Payment systems that do not provide the pooled payment option, or require a project-by-project cash analysis, are extremely labor intensive and are a disincentive for recipients to draw cash as frequently as needed. For example, USDA, DED and DOE ask for disbursement via each award number on their request for cash.

To further complicate the matter, the fact that agencies like USDA and DOE issue an awarded amount, but grantees can not draw that amount down until they receive a separate authorization letter. That letter is often sent months after the award is issued to the grantee, and in some cases, doesn't come at all, resulting in the grantee having to call the agency for assistance and provides an interest free advance of institutional funds.

IV. Audit Issues

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

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

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

Responses IV A-C

We believe that the Office of Management and Budget Circular A-133, and the Federal Agencies' implementation of that circular is well understood and provides appropriate audit coverage. We have not used the Clearinghouse to obtain information on subrecipients audits as we did not know this was an option versus obtaining it directly from the subrecipient. The Clearinghouse should be better advertised and contain instructions on a web site. We feel strongly that the government needs to look at ways to reduce the number of audit reports that must be passed between recipients and subrecipients to comply with the audit requirements.

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.

See attached sheet.

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

We already use FastLane for submitting applications, and the electronic payment systems mentioned on our attached summary sheet. We would welcome more electronic processes.

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

A common face to all proposal and award announcements, application processes, and reporting processes would be ideal. It's time to make the Federal Commons vision a reality.