

From: Robert Beattie, The University of Michigan

Below please find a reply to the questions related to Federal Financial Assistance Management Improvement Act of 1999.

These responses are intended to reflect situations faced by universities applying for research grants, not all grant seeking agencies applying for all assistance programs. Universities account for a large number of applications and grants. While the dollar amount in total is less than the total allocated to other types of agencies, the number of applications are in proportion, quite numerous. The cost of applications is increasing for both the submitting universities and the faculty who will do the research.

What a waste, requiring researchers to continue to divert more of their time from the escalating complexity of the scientific and technical work they are doing, to learning about and dealing with a variety paper or often shoddy electronic systems. Also inappropriate, is requiring universities to devote more staff time and other resources to assisting the faculty with these systems.

It is the fervent hope of all researchers and administrators, at the University of Michigan, at least, that the next few years will show more central control over the burgeoning growth of forms and electronic systems. Moreover, we hope grant giving agencies will be more attuned to the needs those they are empowered to help and involve them more in system developments. Research for the good of the nation, as well as the administration of the research, should be a done as a partnership between universities and federal agencies.

Thank you for the opportunity to provide comments in this crucial area.

Submitted by:

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## I. Application and Reporting Forms

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

The current situation with application forms is nothing short of a disaster for faculty who want to spend time doing good and needed research, and for university administrators who want to assist those faculty. There is little commonality among the forms. Each agency uses a different form, or at least a slight variant of another form, requesting essentially the same identical information. Within agencies there is even some variation.

Why cannot there be a single standard form, used by all agencies. The problem is exacerbated when the forms become electronic. Each agency wants to seem to be in the forefront by creating yet a new system for grant applications. The National Science Foundation has an excellent system, why cannot other agencies model themselves after it.

Moreover, no other agency except the NSF requires applications to be reviewed and sent to it by the Sponsored Projects/Grants Office of a university. They expect the faculty who will work on the project to submit the application, yet they expect the university to be the fiduciary agent for the grant. This lack of understanding of how the grants management system at universities works must cease. If an agency wants to have its own system, at least they should involve clients in the development and in the functioning of the system.

One aspect of applications that is time wasting is Multiple Institutional Data / Certifications -- from a university administration aspect, the most redundant and no-value-added exercise is the repeated requirement to create, sign, copy, and send institutional compliance certifications. (Exclude from this the project-specific certifications such as human subjects approvals.) Re-attesting the University's conformance to Drug Free Workplace, Civil Rights Act, Smokefree Workplace, and so many more, is done several hundred times each year. Surely there must be a central data base capability in Washington for grantee institutions to file such certifications one-time-only, and update if needed.

See below about biographical forms.

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 Federal Demonstration Partnership has already created a standard list of grant application Data Elements which is contained in Transaction Set 194. Every piece of data any agency could need is there.

Even with such a data set, why should data common to a university or faculty member be sent with every application. Cannot the federal government maintain a data base of institutional data for each applicant? For example the name, address, official representative, DUNS number, congressional district of the University of Michigan rarely changes, the latter item maybe once a decade. These data, among others, should be stored in a centralized location to be accessed by all granting agencies.

Likewise, information on faculty should be held centrally. The additional work created for investigators to maintain their biographical data in the myriad formats required by the various federal agencies is a diversion of investigator's time from research to administration. Even short of a central electronic data base, there should be a standard format for PIs to maintain and present biographical data. Government agencies should decide that their first priority is to get more scientific output from their grantees and thus require much less administrative activity from them, especially activity that is repetitive from application to application.

Budget templates and data-- Is there truly any reason that one agency needs the number of man-months while another needs the percent of effort while another needs labor hours? If the National Institutes of Health can trust researchers to the extent that they allow Modular Grants, why cannot other agencies also simplify applications as well. All agencies should have a standard budget template, in common units that can be used by all applicants

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.

There is absolutely no reason whatsoever that all agencies cannot use the same forms for research grants. There must be a standard application form across all grant giving agencies. All of the data elements are common with but a few exceptions. University researchers apply to various agencies and so must use different forms, why? The fact of offering grants to universities is sufficient commonality among agencies to require standard application forms and systems. Gone are the days when each grant giving agency can consider itself aloof from standardization. Such a practice now serves only to create wastage and impediments for researchers who need to spend time doing important scientific work.

A specific case is NIH - DoD biomedical funds (e.g., breast cancer). The same PIs submit applications to both agencies, with likely overlap in readers in the peer review process. What possible justification could there have been for DoD to create an entire application format different from that of NIH.

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?

This has not been a problem for us. Between the internet, other on-line forms, and printed versions, we find what we need. It would be so much better in terms of time and cost savings to have a single form, or better still a single application system.

Though not specifically covered, there should be greater consistency in the format for announcing funding opportunities. More consistent, complete, and clear announcements might help to alleviate more off-target applications.

## 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?

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

Post Award Invention Reporting. Essentially there is one federal policy covering inventions (Bayh Dole); there should be a single form/format for reporting same. The EDISON reporting portal is being used by more agencies for the initial disclosure. There ought to be a standard post award reporting requirement and process for all federal agencies.

## IV. Audit Issues

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

We fully understand the SA process but we often get questions from individuals at Federal Agencies who do not seem to know about the Clearinghouse. The Federal Agencies need to do more to make their own staff aware.

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

Yes

## 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.

We happily use the NSF Fastlane. It does, however, have one glaring fault in that it does not allow the user to keep the data entered or otherwise allow the user to have a copy of the data. All universities want to keep a copy of application data so with Fastlane the researcher or a staff person must reenter the data into a local data base.

We also use the unsatisfactory systems of all other federal grant giving agencies, including Energy, Education, NASA and DOD medical. I should note that Energy and NASA have more than one system. NONE of these systems are as easy to use as Fastlane and NONE include the University Grants Office in the submission process. While it was active, we used the NIH e-snap system. While this had some other problems, it should be noted that NIH did recognize the important place of the Grants Office in the submission process. Moreover, as HHS moves to create a better system, it has created an advisory group of grant recipients to help with development.

We have been involved in the development of two commercial proposal submission systems -- PeopleSoft Grants and GAMS. Neither met our needs for various reasons. In addition, neither were these systems able to keep up with the diversity of the federal submission system situation. Universities are faced with trying to develop procedures and systems to deal with electronic submission in a milieu of constant change and lack of control.

The University of Michigan is one of the foremost universities in the world in creating an information technology infrastructure to enable its faculty and staff to make full use of computers. Even so, it is all but impossible for us to learn about and use the many new systems granting agencies are imposing on us.

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

We would most dearly appreciate an on-line application and reporting system. In particular, we would appreciate ONE on-line system for all agencies, or at least one portal to reach, with one format.

**THE CONTINUING TREND FOR EACH AGENCY OR SUB-AGENCY TO DEVELOP ITS OWN SYSTEM CANNOT CONTINUE.**

It is as if each agency had its own human use requirements with a different review committee needed. Could such a demand be accepted? Difference for what seems the mere sake of difference cannot be tolerated. Hard pressed researchers and administrators,

with fixed indirect cost rates and costs rising in other areas, cannot be expected to deal with new and different application and reporting systems not only from different agencies but even from their sub components. Please give us relief from this burden!

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

First and foremost, agencies can prepare us for the future use of electronic options by INVOLVING us in the development of such options. This is not a colonial situation with the federal imperial powers (agencies) doing what they think best for the little brother university. Universities and agencies must work together to develop systems. Preparation for imposition of unacceptable systems is intolerable, no matter how well meaning the agencies are. The wording of the question shows the problem. Should it not be: "How can agencies and organizations best work together to prepare for the future use of electronic processing option for grants."

One positive aspect of Question C is the use of "option" in the singular. There must be only one electronic processing option.

**DATES:** Comments in response to this notice must be received on or before March 19, 2001.