

March 16, 2001

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

Attn: PL 106-107 Comments

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

At the University of Kansas, we were very pleased to see the Request for Comment; Interim/Draft Plan of Action to Implement Public Law 106-107, the Federal Financial Assistance Management Improvement Act of 1999. In particular, we would like to address section five of that document: Electronic Processing.

While we applaud the initiative taken by governmental agencies to develop a simplified method for the electronic transmission of proposal and other grant information, our experience shows that these types of program often create extra work for university research offices. The basic problem is that many of the electronic formats currently mandated by funding agencies are not compatible with the tracking software used by most universities. Consequently, all pertinent information must be keyed in twice - once for the federal system, and once for the university's internal tracking system. This duplication of effort outweighs any hoped-for benefit of the proposed plan.

The National Science Foundation's (NSF) Fastlane program introduced universities to electronic submission of grant applications. While Fastlane was intended to save time and effort, in actuality, it nearly doubles the amount of work involved in submitting proposals to NSF. Because programs such as Fastlane use a web-based interface, none of the data entered into that interface can automatically go into an institution's internally developed systems for tracking federal proposals and awards. The same problems exist for web-based financial reporting systems. Consequently, it is just as tedious for an institution to submit an on-line application using Fastlane as it is to submit a simple paper copy of the same information.

The outcome of Public Law 106-107 should not be the creation of additional work for those submitting applications and proposals. Because of the need to re-enter data following electronic submission (mentioned above), web-based forms do not save nearly as much effort as would the direct electronic transfer of information. To that end, Public Law 106-107 should seek to establish standard, easy-to-understand data sets, and multiple methods of transmitting them. Transaction Set 194 for EDI transmission, and the Electronic Grants Data Dictionary (developed by the Interagency Electronic Grants Committee) for streaming HTML transmission-or similar systems using newer languages such as XML-should be standardized and adopted by all federal agencies. NIH's ERA Commons has adopted this method, and NSF Fastlane will now accept EDI transmission. These are very positive actions.

The current goal of the Federal Commons project is to establish a system similar to Fastlane's on-line submission program. The logic behind such a move involves providing equal access. The intent of this project is well-meaning; the specific process involved, however, is a step in the wrong direction. If a common data set is adopted and a variety of standard transmission protocols are acceptable, institutions will be able to adapt their internal systems to communicate electronically with the Federal Commons project. Once universities and software developers have this procedural information in a clear and concise format, the electronic transmission of grant proposals to all federal agencies will become a simple, efficient process. This adoption of a standardized transmission protocol should become the emphasis of the Federal Commons system, and should be encouraged across all federal agencies.

Thank you for opening the dialog in this area.

Sincerely,

Vice Chancellor for Research & Public Service