

Memorandum

To: University Research Community

From: Dr. Richard Beaulaurier, FDP Faculty Representative
David Driesbach, FDP Electronic Research Administration Representative
Roberto M. Gutierrez, FDP Administrative Representative

Subj.: Federal Demonstration Partnership (FDP) Fall 2014 Update

Date: November 20, 2014

The Federal Demonstration Partnership (FDP) is a cooperative initiative among 10 federal agencies and 119 institutional recipients of federal funds. The purpose of the FDP is to reduce the administrative burdens associated with research grants and contracts. The interaction between FDP's university and federal representatives takes place via FDP's annual meetings and, more extensively, in the many collaborative working groups and task forces that meet often by conference calls in order to develop specific work products to further streamline contract and grant administration.

FIU has been a member of the FDP since its founding in 1986 and has actively participated in working groups, demonstrations and other initiatives to better research administration. The current institutional representatives are: Dr. Richard Beaulaurier (Faculty Representative), David Driesbach (Electronic Research Administration Representative) and Roberto Gutierrez (Administrative Representative).

Much of the relationship between federal grant sources and universities is carried out behind the scenes and is not visible to most university based researchers. Many of the mutual concerns relate to financial, technical and reporting activities. Most of these activities have minimal impact on the day to day life of researchers. However some issues are of particular importance to researchers, the most important ones to have surfaced over the course of the last year are noted below.

UNIFORM GUIDANCE

The federal government issues a number of circulars that regulate the grant making process for different types of grants and different types of recipients. These circulars have been consolidated into a single "super-circular," officially known as the new "OMB Uniform Guidance" (UG) that will cover all federal grant sources and recipients. The circular will phase into effect, starting on December 26th of this year. For researchers here are some of the more important changes:

Funding Opportunity Announcements (FOA)

- Standard minimum 60 day lead time for all funding announcements. These will include the following features:
 - Minimum number of days will be 30 unless a different period is required by statute or exigent circumstances as dictated by the agency head

- Announcement will be in a standard format & posted
- Specified summary data
 - Specified full text announcement data
 - Proposal application forms pre-approved by OMB

Award Notices

- Create a unique, government-wide identifier number
- "FAIN" for Federal Award Identification Number (e.g., for NIH, R01-GM123456). This means that all federal grants will have the same type of number regardless of grant source.
 - Terms and conditions will be spelled out. This includes deliverables (reports or other) and any milestones

Cost-Sharing

- Voluntary committed cost-sharing is *not expected* in research proposals
- Any cost-sharing obligations *must be* included in FOAs
- Cost-sharing may normally not be used as a factor in the review of applications.

Fixed Amount Awards

- May not earn or keep any profit.
- If terminated early, grant award may be subject to expenditure review

Fixed Amount Sub-Awards

- Need agency prior approval for fixed amount sub-awards (in approved budget or after-the-fact)
- Limited to < \$150k
- Fixed amount sub-awards cannot be used if there is cost sharing
- Requires certification of completion upon conclusion.

Purchasing

- Use of statutorily imposed state or local geographical preferences for purchasing is prohibited on federal grants. This may require some revision of institutional policies.
- Any purchases over \$3K require competitive quotes (potential purchasing implications)

Internal Controls

- Uniform Guidance will require grantees additional oversight and scrutiny of Federal grants. The UG uses the phrase "internal Controls" 103 times!

There are still some challenges with the UG. FDP (and as a founding member of FDP, FIU) will continue working with the federal government and its members to address these issues which include:

- Increased focus on the relationship between financial obligation and performance. The UG proposes some new performance requirements on recipients of federal grants. We are working to see that these new requirements are not too intrusive and do not create undue burden on PIs.
- Disclosure of not just actual, but also "potential" conflicts of interest
- There are some increased burdens related to the fact that what could formerly be classified as vendors will now be classified as subawards.
- There are some increased Pre and Post Award Subrecipient monitoring requirements

- Sole source purchases will require sponsor approval
- Standard Research Terms and Conditions will need to be reissued
- Federal cash drawdowns will be limited at day 91 of the closeout period

The Division of Research will continue to work with the FDP and other professional organizations (COGR and NCURA) as we implement the UG in order to try to minimize the burden on researchers resulting from the changes in the federal regulations that govern grants. A detailed memo to the research community will be released in early December with additional guidance on the UG impacts for proposals and awards at FIU.

ADMINISTRATIVE BURDEN

One of the most important discussions concerning researchers who have federal grants is the issue of administrative burden. The FDP has completed a survey of over 13,000 PIs with Federal grants and contracts at 99 institutions on faculty workload during the 2010-2011 academic year.

On average, PIs indicated that they spent 42% of their time on administrative responsibilities, with the time evenly split between pre- and post-award activities. Almost half of the respondents indicated through written comments that they were frustrated by the amount of time devoted to administrative activities.

Most faculty frustration related (in order) to finances, proposal preparation, IRB, IACUC, interim and final reports, effort reporting, and personnel.

Faculty responding to the survey made a number of suggestions to improve the funding for research, promote a healthier research culture and address workload issues. The full report on the survey can be found here:

http://sites.nationalacademies.org/pga/cs/groups/pgasite/documents/webpage/pga_086500.pdf

The National Science Board of the National Science Foundation has convened a task force on administrative burden. Not surprisingly, they found a similar set of burdens to the PI survey. They also found several cross cutting themes which included burden due to new legislation and regulation, the need for greater commonality between federal agencies in their expectations and documentation required of PIs, need to reduce the burden of audits and oversight, and a relatively wide variation in institutional support the PIs receive. As with other agencies, one source of increased burden has been an overall decline in funding concurrent with an increase in the overall number of proposals. Faculty are applying more frequently, while receiving less funding. This has increased workload both for faculty and for federal staff.

BIOSKETCHES(ScienCV)

A number of federal agencies are in the process of developing a common, electronic bio-sketch generating system called ScienCv. The new bio-sketch will be common across agencies, and will be self-populating. That is, much of it will be filled in by pre-existing data sources, so that they do not need to be created, or to some extent, updated for each new grant submission. ScienCv has been under development in collaboration with NLM, DOD, DOE, EPA, NIH, NSF, USDA and the Smithsonian.

The new system, which is currently live in beta version, should reduce administrative burden. The bio-sketch project, which is currently being tested, was designed to be (a) open to anyone, (b) make better use of existing sources of data to populate the form, and thus reduce burden on researchers, and (c) to allow researchers to retain full control of their profile—bio-sketches remain under control of the their own biosketch.

Bio-sketches will receive input from ORCID, eRA Commons and the NCBI My Bibliography. The profile is designed to cover all relevant information, activities and products that currently go into NIH style bio-sketches. In the upcoming months it is anticipated that ScienCV will also integrate with NSF data sources.

For more information about ScienCV, please refer to the following URL:

http://rbm.nih.gov/profile_project.htm

If you are interested in providing feedback as a tester for the ScienCV system, please contact David Driesbach at driesbac@fiu.edu.

OPEN ACCESS JOURNALS

Federal grant sources are increasingly interested in seeing that there is universal access to scholarly products of publically financed research. This coincides with the trend for new publication outlets to be open access. In most cases this puts an increased burden for grant sources, faculty and their institutions to share in the financial burden for publishing research findings. Interested faculty may want to access this excellent presentation on the current state of open access publishing:

http://sites.nationalacademies.org/pga/cs/groups/pgasite/documents/webpage/pga_084920.pdf