



December 21, 2021

Dr. Eric Lander
Director
Office of Science and Technology Policy
Eisenhower Executive Office Building
1650 Pennsylvania Avenue, NW
Washington, DC 20504
Sent by email to: eric.s.lander@ostp.eop.gov

Dear Dr. Lander,

Thank you for the opportunity to speak with you in September and introduce you to COGR's mission and the types of initiatives we undertake on behalf of the membership. I was pleased to hear that reducing administrative burden in research continues to be a priority for OSTP under your leadership. This message came across clearly in your August 10 [blog post](#) on research security where you said "[e]stablishing rules that are confusing, complicated, inconsistent, or unduly burdensome will not optimize security, because people and institutions tend not to follow such rules carefully." COGR fully supports OSTP's efforts to improve clarity and promote inter-agency harmonization to reduce administrative burden, not only in the research security arena, but in other areas of research administration as well.

During our conversation, you expressed interest in hearing from COGR about specific actions that could help to achieve these goals. I've listed a few recommendations for your consideration below. *We believe that these recommendations could be implemented immediately, with little or no time and resources required.*

A. Goal: Improve Clarity of Agency Requirements

Recommendation: OSTP should encourage each federal agency to collect input from institutions on the agency's plans for application of OSTP's NSPM-33 implementation guidance.

Institutions are awaiting OSTP's issuance of guidance to agencies for implementing NSPM-33. OSTP can help facilitate institutions' compliance with this guidance by encouraging agencies to coordinate their agency-specific implementation of NSPM-33 and seek advance community input on any policies, guidance, or FAQs that they issue. Stakeholder input can highlight guidance that is unclear or inconsistent and streamline compliance efforts. If agencies take this input into account, the resulting guidance would not only reduce burden on awardees but also reduce the need for agencies to subsequently issue clarifications.

B. Goal: Promote Inter-agency harmonization to reduce administrative burden.

The overarching goals of most funding agencies' administrative requirements are similar in nature, yet countless institutional hours and dollars are spent accommodating unnecessary differences in individual agency regulations and policies for the implementation of those common goals. COGR supports OSTP's efforts to encourage agencies to harmonize their requirements to reduce the administrative burden of compliance to the maximum extent possible. Below we have listed some areas where harmonization could significantly drive efficiency and compliance.

Recommendation: Encourage all funding agencies to implement a two-stage proposal review process similar to that currently used by NIH

In 2017, Congress signed into law the American Innovation and Competitiveness Act. Section 201 required that the Director of OMB, in coordination with OSTP, establish an interagency working group (now referred to as the Research Business Models working group (RBM)), recommend processes that may be eliminated, streamlined, or improved. Recommendations included an increased use of "Just-In-Time" (JIT) procedures for documentation that does not bear directly on the scientific merit of a proposal and the use of simplified budgets in advance of peer review selection, with detailed budgets required only for applicants that make it past peer review.

For many years, NIH has capitalized on this JIT approach, by requesting detailed information from funding applicants only after their funding applications have received sufficiently favorable scores in the peer review process. Structuring the application review process in this manner has a tremendous impact on reducing administration burden for researchers.

Unfortunately, not all agencies emulate NIH's approach. Instead, many agencies require that institutions submit *at the time of proposal application*, time-sensitive information such as detailed budgets and budget justifications, current and pending support disclosures, and human and animal protocols. With as few as ten percent of applications making it past scientific peer review, much of the time spent creating this documentation is time that could be better spent on science and other research-related tasks.

Recommendation: Require more federal agencies to adopt the federal-wide Research Terms and Conditions (RTCs)

The RTCs were developed in 2005 by the Research Business Models (RBM), an Interagency Working Group of the Social, Behavioral & Economic Research Subcommittee of the Committee on Science, a committee of the National Science and Technology Council. Federal agencies participating in Federal Demonstration Partnership (FDP) were to use the RTCs, to the maximum extent practicable, to reduce burden and streamline the process of award issuance and administration both for federal agencies and for research institutions. This initiative has proved to be extremely successful because agency use of the RTCs significantly reduces the time it takes for institutions to review and accept awards, leaving more time for research administrators to assist research faculty with other administrative tasks and allowing researchers to spend more time on their science.

Unfortunately, only seven federal funding agencies currently use the RTCs: Department of Commerce, Department of Energy, National Aeronautics and Space Administration, National Science Foundation, Department of Health and Human Services/National Institutes of Health, Department of Agriculture/National Institute of Food and Agriculture, and the Department of Homeland Security. Agencies that are not members of the FDP are not restricted from electing to use the RTCs, and their adoption by additional agencies would greatly assist institutions in reducing burden.

Recommendation: Encourage research funding agencies to effectively use application programming interfaces (APIs) in developing agency systems.

In May 2014, the Digital Accountability and Transparency Act of 2014 (DATA Act) required the federal government to establish a pilot program to facilitate recommendations to standardize reporting elements across the federal government, eliminate unnecessary duplication in financial reporting and reduce the costs of compliance for recipients of federal awards. While progress has been made since then, agency-specific proposal submission systems and award, financial, and invention reporting systems continue to increase, resulting in the redundant and inefficient input of the same type of information in a myriad of different systems. One path to increasing efficiency and effectiveness in this area is encourage agencies to develop systems that allow for application programming interface (APIs). Such APIs could significantly reduce duplicative entries and fundamentally change the way institutions and agencies do business. For example, many of the same data elements required in the System for Award Management are also required for other agency systems, and the use of APIs here could be extremely useful in reducing burden for institutions.

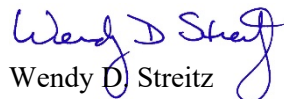
Conclusion:

COGR greatly appreciates OSTP's efforts to date on reducing administrative burden, including actions to drive harmonization among agencies to the greatest degree possible. New and disparate agency requirements frequently require significant and ongoing investment of institutional resources. Unlike other grantees, universities are uniquely prevented from recovering these costs because of the cap on administrative cost recovery. Moreover, this financial burden often limits the ability of small to mid-sized institutions and institutions serving disadvantaged populations to participate in federally funded research.

We believe that OSTP's leadership in encouraging cross-agency implementation of the foregoing recommendations would further OSTP's existing goals, improve administrative outcomes, and significantly reduce institutional burden.

Once again, thank you for the opportunity to provide these recommendations on behalf of our member institutions.

Sincerely,


Wendy D Streit
President

Cc: Kei Koizumi, Chief of Staff, Office of Science and Technology Policy