



February 21, 2023

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General Services Administration
Washington, DC 20006
202-501-4755

Submitted Electronically to:

<https://www.federalregister.gov/documents/2022/12/22/2022-27893/information-collection-federal-audit-clearinghouse#open-comment>

Dear Ms. Koch,

We are writing in response to a Federal Register Notice (Document Citation: 87 FR 78684, Pages 78684-78685), dated December 22, 2022 – [Information Collection; Federal Audit Clearinghouse](#). We appreciate your consideration of the comments enclosed in this letter.

The Council on Governmental Relations (COGR) is an association of over 200 public and private U.S. research universities and affiliated academic medical centers and research institutes. We are a leading voice on the impact of federal regulations, policies, and practices on the performance of research conducted at our member institutions—and when appropriate, we advocate for reducing administrative burden associated with federal regulation.

While COGR supports the transition of the Federal Audit Clearinghouse (FAC) from the U.S. Census Bureau to the GSA, we offer the following comments and potential challenges:

1. ***New data elements and terminologies.*** COGR has closely followed government-wide efforts to implement new data elements and terminologies over the past decade. We support the “consistency principle” behind this effort. However, in practice, there are still challenges as agencies sometimes implement data elements, terminologies, and corresponding reporting requirements that do not follow the “consistency principle.” Consequently, our institutions suffer with new administrative burden and the related cost of compliance repercussions.
2. ***Technology platforms and GUI interface.*** Both a seamless transition to GSA and the creation of a GUI that allows for efficient data uploading (as opposed to the upload of data via the current templates) will be positive outcomes. However, in past situations

when agencies have implemented new technologies, this promise has not always been realized. And when this is the case, our institutions again suffer with new administrative burden and the related cost of compliance repercussions.

3. ***Maintaining the current scope of the FAC and the Single Audit process.*** COGR's understanding is that the implementation of the FAC by the GSA is restricted to the traditional functions of the FAC and single audit process—i.e., submission of and access to the single audit. It is important to maintain the traditional functions. However, if there is any intention to expand the scope of the FAC and the single audit process, this would be a significant concern that we would want to address with the GSA.

While we support the aims of this proposed rule, the topics we have raised in this letter are important topics for consideration before and during the implementation of the FAC by the GSA. ***And importantly, as the implementation of the FAC unfolds, it will be helpful for our community to have access to key GSA personnel to share observations and potential concerns that might take place during this time period.***

Thank you for the opportunity to comment on the proposed GSA rule. Please contact David Kennedy at dkennedy@cogr.edu if you have questions.

Sincerely,

A handwritten signature in blue ink that reads "Wendy D. Streitz". The signature is written in a cursive style with a large, looped "S" at the end.

Wendy D. Streitz
President