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COUNCIL ON GOVERNMENTAL RELATIONS

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April 5, 2017

Dr. Robin Staffin
Director, Basic Research
Office of the Assistant Secretary of Defense for Research and Engineering [OASD (R&E)]
Department of Defense

Subject: Questions pertaining to DoD financial assistance awards pre and post administration matters

Dear Dr. Staffin,

The Council on Governmental Relations (COGR) is an association of 190 research universities and affiliated academic medical centers and research institutes. COGR concerns itself with the impact of federal regulations, policies, and practices on the performance of research conducted at its member institutions.

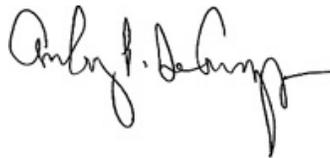
We write to apprise you of concerns our members have expressed while performing certain pre and post award functions under DoD awards.

- Invoice, Receipt, Acceptance, and Property Transfer (iRAPT): Many have expressed that the steep learning curve required to prepare electronic invoices for submission to DoD makes this one of the most cumbersome federal systems to navigate. iRAPT, an application of the Wide Area Workflow suite, requires the grant recipient to navigate through several pages in order to bill using pre-populated Department of Defense Activity Address Codes (DODAACs) that are frequently incorrect. Although the DODAACs will route the invoice to DoD approvers within the approval chain, recipients have also been told to submit emails creating duplication of effort. Because of the above and other terms and conditions of an award, the cumbersome requirements of iRAPT require that grant recipients maintain individual worksheets containing specific notes for billing individual awards. We ask your assistance in reviewing these matters to reduce administrative burden and improve efficiency.
- Closeout Reports: There appears to be a timing issue relative to award issuance systems and the closeout system. Specifically, award recipients are being notified by DoD personnel that certain items are needed for closeout purposes even after a Notice of Award has been issued or reflects either a no cost extension or an additional year of funding. In these cases, the grant recipients are being asked to forward the notice of award back to DOD to show proof of the extended end date. We ask that DoD review this process and adjust its internal business practices to catch updated end dates prior to requesting closeout materials from recipients.

- Agency Deadlines for Proposal Questions: We note that the opportunity to submit questions regarding information in funding opportunities expire usually one (1) month prior to the application submission deadline. The most recent example a member noted was the DOD Vannevar Bush Faculty Fellowship which was issued as a FOA. Question deadline was July 27, 2016, the white paper was due August 17, and full application was due January 9, 2017. While it is understandable that some deadline be set, allowing questions closer to the application deadline would improve the quality of applications since many proposals are not submitted for administrative review (where additional questions often arise) until the week or two before a deadline. Posting Q&As on an FOA website or allowing for an email push to potential applicants who have signed up to receive information about that FOA would allow a question deadline closer to the proposal's due date.

We appreciate your willingness to look into these matters on our behalf. Please feel free to forward our letter to the appropriate person within DoD who may be responsible for these areas. If you have additional questions, please contact Jackie Bendall at (202) 289-6655 or jbendall@cogr.edu. We look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony P. DeCrappeo". The signature is fluid and cursive, with a long horizontal stroke at the end.

Anthony P. DeCrappeo
President