



Timothy F. Soltis, Deputy Controller  
Office of Federal Financial Management  
Office of Management and Budget  
725 17<sup>th</sup> Street, NW  
Washington DC 20503

January 15, 2019

Reference: Draft Federal Grants Management Data Standards for Feedback

Dear Mr. Soltis,

The Council on Governmental Relations (COGR) is an association of 188 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 are very grateful for the opportunity to comment on the Grants Management Federal Integrated Business Framework (FIBF). The set of data fields represents an important foundation for the future of electronic grant communication, information, and collaboration and we are appreciative of the good work completed to date.

We are also optimistic and hopeful that the applicable FIBF data standards will be standard across all federal granting agencies and not all should be required to be submitted with each proposal or report. At this time, a number of questions make it difficult for us to understand the impact and implication. We hope to be given additional opportunities to provide feedback once more information is provided.

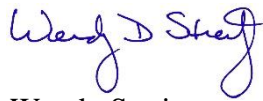
Upon review of the draft standards, we provide the following comments. It is unclear who will be responsible for completing the information set represented by the data fields and on what criteria and whether more than one response could be given; for instance, some of the data may be appropriate to respond by institution and some by person or by project.

It is unclear how much transparency is intended for the data sets once implemented and we are concerned about the nature of some of the data included in the FIBF data standards. Many of the text fields would include information that is not currently captured for public release and may be sensitive for both research sponsors and research grantees. Areas of specific concern include data fields that could share potential intellectual property, the use of research resources that is culturally or politically sensitive such as legal use of illegal substances, conflicted use of human or non-human stem cells, and the use of animals as research subjects. Such areas are currently very carefully approached in current public data sets and would require deliberate thought and careful treatment to protect both the conduct of the research and those involved. We are also concerned about public disclosure of researcher citizenship status and recommend the request

and how data is handled be considered in context of anti-discrimination law.

In closing, we applaud the Office of Management and Budget in its goal to develop data standards that will contribute to a future state where grants data are interoperable, there are fewer internal and public-facing grants management systems, and Federal awarding agencies and recipients can leverage data to successfully implement a risk-based, data-driven approach to managing Federal grants. We ask that you continue to partner with stakeholders by holding town halls or other venues in order to effectively achieve the intended goals. We look forward to working with you on this important endeavor.

Sincerely,

A handwritten signature in blue ink that reads "Wendy D. Streitz". The signature is fluid and cursive, with a large initial "W" and a stylized "S".

Wendy Streitz  
President