

Academies seek regulatory relief for university research

Committee report urges agencies to trim and standardize their grant-application requirements.

Congress should create a new White House entity to oversee and simplify regulations on federally sponsored academic research. That recommendation comes from *Optimizing the Nation's Investment in Academic Research*, an interim report by a committee of the National Academies of Sciences, Engineering, and Medicine. The new entity, a policy board, would be populated by officials from research universities and would strive to make application requirements for research funding more uniform, more effective, and less duplicative.

As one example, the board would consider instituting common grant applications and financial conflict-of-interest disclosures. It would report to a newly created associate director position at the Office of Science and Technology Policy and to the Office of Information and Regulatory Affairs in the Office of Management and Budget (OMB).

Over the past decade, the acceptance rates for research proposals at NSF and the National Institutes of Health have reached historic lows; in 2014 they were 20% and 16%, respectively. Since the early 2000s, the rate of principal investigators who are funded by NSF has remained relatively steady around 33–37%, which shows that researchers often submit multiple proposals to increase their chances of receiving an award.

An undue burden

According to the committee report, investigators submit an enormous amount of information even for a proposal with a minimal chance of success. Applicants also spend an inordinate amount of time updating and revising applications and correspondingly less time conducting research.

According to the report, "Proposal preparation has become, in large measure, an administrative activity that dampens scientific ferment and imposes undue burdens on the researcher, his or her institution, and those engaged in proposal review."

The academies' committee, chaired by retired University of Texas at Austin president Larry Faulkner, made recommendations about how federal agencies should improve the application process.

They should trim initial research proposals to the briefest information required for peer review, examine the effectiveness of the proposed research to address the questions raised, and consider the investigator's ability to conduct the research.

More detailed information should be required only after the proposal is deemed likely to be funded, the report says. In certain cases, particularly for new initiatives or when the chances of success are exceptionally small, NSF does offer a preliminary proposal submission process to minimize paperwork.

Universities and individual investigators often receive research funding from multiple agencies, whose approaches to grant proposals, disclosure of financial conflicts of interest, and other matters are not standardized. Overlapping regulations require multiple reporting of the same information in different formats and on different schedules. In addition, conflicting guidance from different agencies regarding compliance has created uncertainty and confusion, which often leads universities to err on the side of caution by implementing overly prescriptive procedures. The report urges institutions to determine whether they have themselves created excessive administrative requirements.

Congress and the OMB should develop uniform grant proposal forms and a common conflict-of-interest policy for all funding agencies, the report says, and a single agency should be responsible for developing a central database of investigators and their research outputs.

The committee's report was expedited at the request of Senator Lamar Alexander (R-TN), who asked for recommendations in time for legislation he intends to draft this fall. Alexander chairs the Health, Education, Labor, and Pensions Committee, which has jurisdiction over NIH, the largest federal funder of nondefense research.

Report coauthor Harriet Rabb, vice president and general counsel at the Rockefeller University, told reporters that more than 90 federal regulatory and policy changes affecting university research have occurred since 1991.

Those included new regulations and revisions to existing ones. Also in 1991, the OMB capped the administrative costs that institutions could charge to the government at 26% of a grant's direct research costs. Regulatory growth has accelerated since that time, from 1.5 new requirements per year during the 1990s to 5.8 per year in the 2003–12 period, according to Rabb. More and more of investigators' time is diverted to administrative tasks "that may be duplicative, inconsistent, and unclear," she said. Often, new regulations are triggered by isolated events, and there is no formal entity or process for reconsideration.

Hunter Rawlings, president of the Association of American Universities, called the recommendations "a good start," saying they are consistent with many made by his and other organizations. "Compliance and regulatory oversight are essential to the conduct of federally supported research, but too many overlapping requirements have little or no value," Rawlings said in a statement. "When universities feel compelled to over-enforce regulations, this also adds to costs and reduces efficiency."

Auditing reform

Ensuring compliance with research grant regulations is the responsibility of funding agencies' inspectors general. The report says that IGs don't always agree with agency management's interpretations of policies regarding allowable expenditures. It recommends that IGs revise their process for selecting which institutions to audit, including considering an institution's previous clean audits and length of the funding relationship with the government. The process should be made more transparent to universities; IGs at NSF and the Department of Health and Human Services, which oversees NIH, have told universities that their audit criteria are confidential.

It's not uncommon, the report says, for the results of a preliminary IG investigation to be publicized prematurely and cause "unwarranted reputational harm" to universities. The completed audit, which generally finds significantly smaller disputed charges, usually receives little or no publicity, according to the report.

Estimated costs to universities for responding to audits range from \$300 000 to \$1 million per campus. In addition, the report notes, the taxpayer foots the bill for investigators' time.

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