



ASSOCIATION OF AMERICAN UNIVERSITIES

Brandeis University
Brown University
California Institute of Technology
Carnegie Mellon University
Case Western Reserve University
Columbia University
Cornell University
Duke University
Emory University
Harvard University
Indiana University
Iowa State University
The Johns Hopkins University
Massachusetts Institute of Technology
McGill University
Michigan State University
New York University
Northwestern University
The Ohio State University
The Pennsylvania State University
Princeton University
Purdue University
Rice University
Rutgers, The State University of New Jersey
Stanford University
Stony Brook University - State University of New York
Syracuse University
Texas A&M University
Tulane University
University at Buffalo - State University of New York
The University of Arizona
University of California, Berkeley
University of California, Davis
University of California, Irvine
University of California, Los Angeles
University of California, San Diego
University of California, Santa Barbara
University of Chicago
University of Colorado, Boulder
University of Florida
University of Illinois, Urbana-Champaign
University of Iowa
University of Kansas
University of Maryland, College Park
University of Michigan
University of Minnesota, Twin Cities
University of Missouri, Columbia
University of Nebraska - Lincoln
University of North Carolina at Chapel Hill
University of Oregon
University of Pennsylvania
University of Pittsburgh
University of Rochester
University of Southern California
University of Texas at Austin
University of Toronto
University of Virginia
University of Washington
University of Wisconsin - Madison
Vanderbilt University
Washington University in St. Louis
Yale University

May 1, 2009

Ms. Marguerite Pridgen
Office of Federal Financial Management
Office of Management and Budget
Room 6025, New Executive Office Building
725 17th Street NW
Washington, DC 20503

RE: Standard Data Elements for Reports under Section 1512 of the American Recovery and Reinvestment Act of 2009, Public Law 111-5

Ms. Pridgen:

On behalf of the Association of American Universities (AAU), I appreciate the opportunity to comment on the standard data elements for reporting under section 1512 of the American Recovery and Reinvestment Act (ARRA).

AAU represents 60 leading U.S. public and private research universities and is devoted to maintaining a strong national system of academic research and education. Our institutions conduct over half of all federally sponsored university-based research and nationally award approximately 17 percent of all U.S. bachelor's degrees, 20 percent of master's degrees and more than 50 percent of all doctoral degrees. Our institutions, faculty, and staff know that the President, Congress, and the American people expect us to use funds provided under ARRA to create jobs, pursue scientific opportunity, and educate tomorrow's leaders. We are fully committed to meeting these responsibilities.

AAU institutions will likely receive a significant amount of ARRA funds from federal research agencies (e.g. National Institutes of Health, National Science Foundation, and U.S. Department of Energy). We are committed to seeing that the ARRA funds our institutions receive are spent well and that the impacts of this funding are carefully and fully reported to the public. We also want to ensure that the ARRA data that is collected by the federal government is uniform and accurate. It is therefore essential that the ARRA reporting requirements for institutions be consistent, clear, and reasonable across all federal research agencies, and that our institutions have clear guidance from OMB concerning these reporting requirements.

AAU fully endorses and aligns itself with comments submitted by the Council on Governmental Relations (COGR) on April 29, 2009. A copy of the COGR comment letter is attached. Below, we would like to briefly restate and reinforce some of the points made in the COGR letter from AAU's perspective.

- 1) It is essential that reporting requirements be uniform and standardized across federal research agencies.** We concur with statements made by COGR calling for standard reporting requirements across all federal research agencies without additional agency-specific data elements or unique agency-specific reporting formats. It would be very burdensome, and in our opinion unproductive, for our institutions to report different information to each federal agency from which they receive ARRA funds.

- 2) ***The electronic portal for ARRA reporting must be user friendly, functional, and supported with adequate resources.*** We join COGR in requesting that OMB and the federal agencies seek input from the grantee community as they develop a central government-wide electronic portal for ARRA reporting. Our institutions' ability to submit reports in a timely and complete fashion will be dependent upon the functionality of this portal and its capacity to handle voluminous data submitted from multiple institutions simultaneously. The ongoing problems that our institutions have had with *Grants.gov*, the unified federal site for submitting grant proposals to all federal agencies, raises serious doubt as to the government's ability to create a functional portal for reporting ARRA data. Given the *Grants.gov* experience, we would urge that adequate resources be committed by OMB to the development of this portal and that the portal be developed in close consultation with end-users to ensure that the system works before it is declared fully operational.
- 3) ***The final and quarterly ARRA reporting period deadlines should be adjusted.*** Our institutions are concerned about the required reporting period submittal deadlines. Under the proposed reporting guidelines, final ARRA reports are due by the end of the project period, in contrast to the normal requirement of federal research agencies for financial reports, which is 90 days after the end of the project period. We would strongly urge OMB to make the final ARRA reports due within 90 days after the project end date in keeping with current agency requirements.

Moreover, we would urge that the reporting period be set 30 days before the quarterly reporting end-date to ensure that our institutions have the time to compile the required information and submit accurate and complete quarterly reports. For example, the reporting period for the June 30 report would be February 28-May 30.

We raise this concern about the final reporting requirement because it is the current standard practice. We raise the more important quarterly reporting concern as university fiscal and payroll cycles and closing dates vary considerably. If the 10-day quarterly reporting requirement stands, our institutions might be forced to report data through the last full month of the quarter, rather than report full-quarter data after all cycles and closing dates have been completed. We commend to you the views and expertise of COGR on these matters.

- 4) ***Reporting requirements for jobs "created and retained" at universities from ARRA research funds need careful consideration.*** We urge OMB and the Administration to develop and provide uniform guidance as to how "jobs created and retained" through ARRA funding are calculated, especially for research grants and awards. It is essential that our campuses have uniform guidance and definitions. If institutions collect and report this information using different definitions and assumptions, the data collected in pursuit of transparency and accountability will be highly variable and of little practical use in demonstrating the economic impact of ARRA research funding. The reporting of jobs created and retained must be both sound and reasonable, and institutional officials, faculty, and researchers who are direct recipients of ARRA research funds must have a shared and clear understanding of what is expected of them.

While we are generally comfortable with expressing these numbers in terms of "full-time equivalents" as outlined in the *Federal Register*, we would point out that this is fundamentally different from how universities and research institutions are required to account for an individual's workload and effort charged to a particular research grant under OMB Circulars A-21 and A-122. What is not captured in the reports of jobs created and retained is the broader economic impact of universities on their communities and the jobs created and retained using university funds in support of ARRA-funded projects. AAU does not believe that our institutions are in a position to account for or report these contributions in a consistent and useful manner. We urge OMB to work with federal agencies and the Council of Economic Advisors to develop

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algorithms and other macro-level methods and data sets to ensure that the indirect jobs created or retained as a result of ARRA funds are accurately counted for by the federal government.

Again, AAU appreciates the opportunity to comment on the ARRA reporting requirements, and we look forward to ensuring that the funds provided to our universities are spent in a responsible way. Research universities, their faculty, and staff have been given a great responsibility as part of the President's program for economic recovery: to create jobs and pursue scientific opportunity to advance tomorrow's technologies in areas such as energy, global climate change, and public health. We stand ready to meet these expectations and look forward to working with you in achieving them.

With best regards,

A handwritten signature in black ink, reading "Robert M. Berdahl". The signature is written in a cursive style with a long, sweeping underline.

Robert M. Berdahl
President

Attachment: COGR Letter of April 29, 2009.