



# Policy Recommendations: Research Regulatory Reform

**A**s federal research grantees, contractors, and stewards of student financial aid funds, research universities take seriously their duty to use taxpayer funds efficiently and to comply with federal rules and regulations.

Most regulations and reporting requirements are well intentioned, however, the layering of additional federal regulations coupled with unnecessary and duplicative regulations and reporting requirements reduces the ability of universities to carry out their education and research missions.

The costs of inefficient government regulations are not simply financial. Regulations also reduce faculty productivity by diverting time from research and teaching. A [2007 study](#) by the Federal Demonstration Partnership showed that *42 percent of faculty time spent on conducting federally funded research was actually for administrative duties*, and a [follow-up survey](#) showed similar results. Although all faculty have many administrative duties they must attend to, both studies show that a sizeable portion of the administrative duties is attributable to compliance with federal regulations.

***The costs of inefficient government regulations are not simply financial. Regulations also reduce faculty productivity by diverting time from research and teaching.***

Source: *A Profile of Federal-Grant Administrative Burden Among Federal Demonstration Faculty*

**AAU urges Congress and the Administration to harmonize, streamline, and eliminate unnecessary, duplicative regulations and reporting requirements.**

**To reduce the regulatory burden placed upon research universities, AAU recommends that Congress and the Administration:**

**1. Stand up new Research Policy Board (RPB).**

Section 2034 of the 21st Century Cures Act calls on the OMB Director to staff a new RPB with 10 or fewer federal members and 9-12 professionals from academic or other non-profit research institutions.

Members are to be appointed through a formal process including nominations by the research community. This board is charged with coordinating and improving regulations and policies, identifying policy and regulatory gaps, and conducting ongoing assessment of regulatory burden.

**2. Establish the National Science and Technology Committee (NSTC) interagency working group on research regulations.**

This working group should work collaboratively with the RPB required by the 21st Century Cures Act.

# Research Regulatory Reform

## continued

### **3. Reduce Inspector General (IG) overreach and unnecessary audit burden.**

To combat waste, fraud, and abuse, most federal grant recipients are required to be audited under the Single Audit Act of 1984, and the Single Audit Act Amendments of 1996. To improve efficiency of oversight and compliance, grantees who have been deemed low-risk under its single audit, should not go through additional, more broadly focused audits unless the IG identifies due cause and justification.

### **4. Act on additional regulatory reform provisions included in recent legislation and recommended in congressionally requested reports.**

Recent legislation and congressionally requested reports by [The National Academies Committee on Federal Research Regulations and Reporting Requirements](#), [Government Accountability Office \(GAO\)](#), and [National Science Board](#) outline recommended regulatory reform provisions, consistent with the recommendations of the report AAU asks Congress and the Administration to:

)] **Evaluate and revise Public Health Service Conflict of Interest Reporting Requirements** as required by the 21st Century Cures Act.

)] **Modify current requirements for sub-recipient monitoring** of university sub-awards to make them more rational and less burdensome while preserving accountability. Waive the requirement for grantees to review audit information and issue a management decision if the subrecipient is subject already to federal A-133 audit.

)] **Review animal research regulations** to ensure the safety and proper treatment of laboratory animals while aligning NIH, FDA, and USDA Requirements.

)] **Align International Traffic in Arms Regulations** export control definitions relative to fundamental research with Export Administration Regulations.

)] **Revise Federal Acquisition Regulation (FAR) 4.703** to eliminate the requirement that paper records for purchases made with grant and contracts funds be retained for a period of three years.

)] **Simplify and streamline current grant application & reporting requirements** across federal agencies as called for in Section 201 of the American Innovation and Competitiveness Act (AICA).

*To view AAU's research and higher education regulatory reform policy recommendations for the 115th Congress and the Administration, visit [www.aau.edu/policy-recommendations](http://www.aau.edu/policy-recommendations).*