

Joint Statement of the Association of American Universities (AAU), Association of Public and Land-grant Universities (APLU) and Council on Governmental Relations (COGR)

**“Academic Research Regulatory Relief:
A Review of New Recommendations”**

Hearing before the
Committee on Science, Space, and Technology
Subcommittee on Research and Technology

Congress of the United States
House of Representatives

September 29, 2016

Our associations – which together represent most major U.S. research universities – commend the House Science, Space and Technology Subcommittee on Research and Technology for holding the hearing “*Academic Research Regulatory Relief: A Review of New Recommendations.*” We greatly appreciate the Subcommittee’s review of recent recommendations by the National Academy of Sciences and the U.S. Government Accountability Office (GAO) in their reports on streamlining federal regulations on academic scientific research to optimize the nation’s investment, while ensuring accountability and scientific integrity.

Universities and researchers take seriously their responsibilities to account for their use of federal resources and comply with federal requirements. However, the federal government also has a responsibility to periodically evaluate regulations to determine whether or not they are efficiently achieving their intended objectives. Too often such requirements are ill-conceived, ineffective and unnecessarily duplicative, reducing the time researchers can devote to discovery and innovation. Indeed, surveys conducted by the Federal Demonstration Partnership (FDP) have found that 42% of faculty time relating to the conduct of federally funded research is spent on administrative duties, much of which can be directly attributed to time spent ensuring compliance with a growing number of federal regulations and reporting requirements.

While greater efficiency of federal research dollars is critical, the fiscal situation of many of our universities also requires a reexamination of regulatory and reporting requirements to ensure a proper balance between accountability and risk management and to see that federal and institutional resources – as well as researchers’ time and effort – are being used effectively and efficiently. The recent reports by the National Academies Committee on Federal Research Regulations and Reporting Requirements and the GAO highlight some key areas where reform could significantly reduce the administrative workload placed on researchers by federal regulations and decrease costs without sacrificing accountability, ethics or safety.

AAU, APLU and COGR have identified several specific research-related requirements that we believe are particularly unproductive, costly, and in need of reform. We were pleased to see many of these reforms specifically called out in the National Academies and GAO reports. These include requirements and policies pertaining to subrecipient monitoring; federal effort reporting; financial conflict of interest requirements, specifically those currently imposed by the Public Health Service; export controls; micro-purchase requirements for obtaining multiple quotations for small purchases; and just-in-time submission and streamlined and harmonized processes for research agency grant submissions.

We would like to draw specific attention to a recommendation in the National Academies report that Congress create a Research Policy Board (RPB) to bring together high-level stakeholders from the academic research community and federal funding agencies to foster more effective conception, development, and harmonization of research policies and regulations. Our associations strongly support the creation of an RPB. We believe that this board would be most effective if overseen by the OMB's Office of Information and Regulatory Affairs (OIRA), working in close coordination with the Office of Science and Technology Policy (OSTP).

We also support the creation of a new Associate Administrator for the Academic Research Enterprise within OIRA that would jointly report to OSTP. The Associate Administrator's specific responsibilities would be to provide leadership to and support for the RPB, help harmonize and streamline research-related regulations, policies and procedures, and work with federal research agencies to minimize regulatory burdens applicable to research institutions by regularly conducting retrospective and prospective regulatory reviews.

Finally, we would like to thank Subcommittee Chair Barbara Comstock and Ranking Member Dan Lipinski for their outstanding leadership on this matter. Each has introduced legislation aimed at addressing unnecessary regulatory burdens placed on academic institutions and their researchers: the *Research and Development Efficiency Act (H.R. 1119)*, introduced by Rep. Comstock, and the *University Regulations Streamlining and Harmonization Act (H.R. 5583)*, introduced by Rep. Lipinski. We note that H.R. 5583 includes the creation of the new RPB and Associate Administrator for the Academic Research Enterprise, proposals we highlighted above.

In conclusion, AAU, APLU and COGR firmly believe that compliance and regulatory oversight are essential to the conduct of federally supported research and will continue to work with our institutions to ensure they do their part. At that same time, both the Administration and Congress should continually seek ways to streamline the federal regulatory infrastructure to ensure the efficient and productive use of federal research funding and to maintain the health of the U.S. research enterprise. We again thank both the full Committee and the Subcommittee for drawing attention to, and advancing, this important objective. We would like to continue to work with you to advance your efforts to accomplish this goal through both legislative and non-legislative means.