

U.S. HOUSE OF REPRESENTATIVES
COMMITTEE ON SCIENCE, SPACE, AND TECHNOLOGY

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October 3, 2012

The Honorable Gene Dodaro
Comptroller General of the United States
U.S. Government Accountability Office
Washington, DC 20548

Dear Mr. Dodaro:

In response to a 2009 Congressional request, the National Research Council of the National Academies assembled a group of experts and, in June, issued the report, *Research Universities and the Future of America: Ten Breakthrough Actions Vital to our Nation's Prosperity and Security*. In it, they provide recommendations to "assure the ability of the American research university to maintain the excellence in research and doctoral education needed to help the United States compete, prosper, and achieve national goals."¹ One of the ten recommendations states:

Reduce or eliminate regulations that increase administrative costs, impede research productivity, and deflect creative energy without substantially improving the research environment.²

As a follow-up to the issuance of the report, the Subcommittee on Research and Science Education of the House Committee on Science, Space, and Technology held two hearings to discuss the recommendations with the academic and business communities. It is evident from these hearings, the report, and additional conversations with the university research community that the current regulatory environment may be limiting the growth of fundamental basic scientific research. In particular, concerns were raised about three requirements: the effort reporting required under Office of Management and Budget (OMB) Circular A-21; sub-recipient monitoring required under OMB Circular A-133; and the paper record maintenance required for contractors under the Federal Acquisition Regulation (FAR) 4.703.

While it is necessary and imperative that research universities maintain transparent and accountable systems to track the use of federal dollars, I am concerned with the amount of time and resources being spent on duplicative and burdensome paperwork and red tape in the conduct of federally funded scientific research. In an effort to better understand the true nature and extent of the existing burdens, I respectfully request that GAO review the current regulations and

¹ *Research Universities and the Future of America*, National Academies Press, Washington, D.C., 2012, p.192.

² *Ibid.*, p.129.

reporting requirements imposed on research universities and provide answers to the following questions:

1. What federal requirements, not limited to legislative mandates, reporting requirements and regulations, create reporting burdens for research universities? Are there any ineffective, duplicative, redundant, inappropriately applied, and/or onerous regulations with which research universities currently must comply; and if so, what are they?
2. With regard to research universities, how do the following requirements balance regulatory burden with accountability for federal funds: OMB circular A-21; OMB circular A-133; and FAR 4.703? Please be sure to include a review of the approximate time spent or funds expended and the duplication of effort in complying with the requirements as a part of your examination of the level of burden.
3. What are the potential benefits and disadvantages of modifying requirements, including those that experts and universities identified as most burdensome?

If you have any questions, please feel free to have your staff contact Kirsten Duncan with the Research and Science Education Subcommittee at (202) 225-9644.

Sincerely,

A handwritten signature in black ink that reads "Mo Brooks". The signature is fluid and cursive, with the first letters of "Mo" and "Brooks" being capitalized and prominent.

Rep. Mo Brooks
Chairman
Subcommittee on Research and Science Education