Reducing the Administrative Workload for Federally Funded Research

Statement of

Gina Lee-Glauser, PhD
Vice President for Research
Syracuse University

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and
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Chairmen Broun and Bucshon, ranking members Maffei and Lipinski, and distinguished members of the subcommittees.

I am Gina Lee-Glauser, Vice President for Research at Syracuse University and I have been actively engaged in research development and administration for more than 20 years. Thank you for the invitation to testify at this joint subcommittee hearing; it is both timely and important especially in light of recent reports on the administrative burdens of research on faculty as well as the OmniCircular, recently released by the Office of Management and Budget.

I will discuss the role and impact of some federal regulations on Syracuse University's research environment and our principal investigators, and select recommendations of the National Science Board's report, *Reducing Investigators' Administrative Workload for Federally Funded Research* most relevant to SU. My remarks will focus on three topics: the application process; research subjects' protections; and progress reporting.

Syracuse University is a member of the Federal Demonstration Partnership (FDP) and we participated in its administrative burdens survey. With and through the FDP, we are proud of our commitment to and participation in activities designed to develop and implement best practices that will reduce the administrative burden on faculty and others in the research enterprise. Our goal here is to put our limited resources to their best use to benefit our faculty, their research efforts, and society.

Time is perhaps our faculty and staff members' most precious resource, and we all share in the responsibility to identify and implement processes that efficiently and effectively allow us to achieve our goals of supporting research to accomplish its many benefits without comprising accountability to a sponsor's requirements, the safety and well-being of research participants, and the welfare of our nation and the environment. The question we are all grappling with is: how best to achieve these ends?

Complicating our collective efforts is the constriction in federal research funding. At Syracuse our principal investigators are spending considerable time revising and resubmitting applications in order to get just one application funded. The success rates of research programs to which SU faculty apply, including the National Science Foundation and the National Institutes of Health, are now in the single digits. Disturbingly there is likely no meaningful difference in quality or the potential impact between funded applications and the next tier of non-funded applications. So in addition to the time lost by researchers in preparing revised applications, the pace of innovation and of knowledge creation is delayed.

This discouraging state of competitive funding also is having a chilling effect on our students. I am passionate about supporting students from groups underrepresented in the academy and STEM disciplines. I have directly observed the stifling effect that the current funding environment is having on these students' career plans. Every day, they see their advisors cope with the stress caused by an uncertain funding environment and the challenges in successfully achieving work / life balance. And so, most are choosing to pursue non-academic careers. This is a tragedy for research institutions that desperately need the diversity of thought and experience that these exceptionally talented individuals would bring.

Although I stand with my colleagues in the research community to advocate for increased funding, we can be making steps to improve the application process. A complementary solution proposed by the National Science Board is to harmonize proposal components. For example, biographical information should be harmonized across agencies. However, we seem to be going in the opposite direction. The

National Institutes of Health has initiated a pilot for a new biographical sketch format that requires researchers to describe up to five of their most significant contributions to science along with the historical background that framed their research. This is in addition to their publications, honors and appointments and personnel statement. This new requirement, as does the personal statement, complicates the efficient development of a biographical sketch. We encourage the exploration of SciENcv or other similar approaches to more efficiently develop biographical sketches containing between 10 to 15 peer-reviewed publications or research products and other standard information that can be systematically obtained and easily maintained.

Another recommendation for the grant application process is to require all research-granting agencies to use the Grants.gov portal or a system like FASTLANE. Public Law 106-107, the Federal Financial Management Assistance Act of 1999, created the foundation for Grants.gov; this law expired in 2007 perhaps enabling the proliferation of a new crop of grant application systems. Although agencies' research missions may differ, the structure and content of research grant applications are more similar than dissimilar. A more consistent means of applying for grants with standard core components and modular budgets would help reduce administrative burden for faculty as well as support staff.

I also strongly support the Board's recommendation for expanded use of Just-In-Time approaches by all federal agencies, modeled after those used by the National Institutes of Health. This would include documentation of human or animal subjects approvals, evaluation of financial or other overlap, or other information not required to determine proposal merit, but essential for award negotiations or processing.

A second burdensome area for SU faculty pertains to the regulations governing human and animal subjects' protections. These regulations importantly protect the rights of research subjects and ensure that the risks and benefits are assessed and managed. Human subjects' research at Syracuse is predominantly social or behavioral in nature, and so is ordinarily of low risk. Current federal regulations do not yet provide a framework to more efficiently manage the review and oversight of these lower risk research protocols. Human subjects' regulations are stated as the 'minimum' expectation, and often accrediting bodies require much higher standards for documentation. To the best of my knowledge, there has been little work rigorously examining the benefits of this additional oversight to the actual protections of human subjects especially those participating in low risk research.

Similarly the process to document and evaluate the use of animals in research could be more efficient. As noted in the Board's report, the required literature review to determine if alternatives to the use of animals exist is of little practical benefit, and has simply become an exercise for faculty and IACUC members to 'check the box.' However, time spent responding to this requirement, is time unavailable for other more meaningful research activities. But in our current system, failure to 'check the box' will result in a finding that has no bearing on the actual protections for or reductions in use of animals in research.

Lastly I know that submission of research progress reports is often a 'pain point' for my faculty. I look forward to the efficiencies expected from federal-wide implementation of the Research Performance Progress Report. Like all new tools, we know that there will be hiccups along the way, but I appreciate the willingness of our federal research sponsors to work in collaboration with the FDP and the grantee community to further enhance these reporting tools and so reduce the administrative burden on faculty.

I would like to close with a few remarks about the recently released OmniCircular. Syracuse, like other research universities, is currently evaluating the impact of new provisions on our current policies and procedures. We view this as an opportunity to identify and implement re-engineered processes that will allow us to more efficiently and effectively use federal funds in support of research. We are also closely monitoring agency implementation of these regulations, with the hope that there will be very few deviations from the provisions. To that end, I ask this committee's help in avoiding the introduction or enactment of new legislation or regulations that would result in additional grant-related requirements on an agency and its grantees.

I thank the committee for taking a leadership role on this important topic and I would be happy to answer any questions you may have.