Administrative Cost Working Group

Draft Notes from FDP Meeting

8/30/10

The group was charged with the identification of faculty tasks that are not directly pertinent to research but required based on various regulations, laws and requirements associated with compliance or other non-research aspects of awards. The tasks identified below are assumed to be permissible as A-21 is currently written. In other words, these are not clerical nor administrative, per se but rather support the management of the project. To the extent that other staff with specialized knowledge and skills could either perform these tasks or provide support in performing the tasks, faculty could increase the percentage of time and effort associated directly with research. The extent to which the more tangential tasks are a burden to faculty vary by project, but are particularly onerous when faculty are engaged in research that is heavily regulated (e.g., studies involving human subjects or animal care).

Three possible approaches to address the faculty burden were discussed: (1) PI direct charges the appropriate staff in project budgets and narratives, and the federal agency approves as part of the award; (2) a project management model addresses common needs for research support that are domain specific and the PI direct charges portions of the staff assigned to this group to federal awards; and (3) a university-wide, centralized approach to the provision of research support is funded by increase in F&A recovery (raise cap).

Approach 1 & 2 rely on commonly held assumptions/interpretations of allowable tasks under the current version of A-21. Examples of tasks that are considered burdensome to faculty, but allowable given the ‘project management’ nature of the tasks, include the following:

1. IRB process, including informed consent
2. IACUC
3. OSHA requirement (e.g., select agents)
4. Clinical trials.gov registration
5. Ancillary committees (IBS, radiation)
6. Sub-recipient monitoring
7. Export controls, including licensing
8. Project outreach/public engagement
9. Public access
10. Data management and data sharing
11. Effort reporting
12. Project certification
13. Milestone management
14. Technical reporting
15. IND/IDE (Drug & Devices)
16. Small business contracting goals
17. Material transfer agreements
18. Subcontract plans

The next step in the process will be to draft a white paper describing these project management tasks and to propose a pilot for FDP schools to consistently direct charge pro-rated costs to multiple awards at levels ranging from as low as 5% to 10% to 50% or higher based on the specific responsibilities of the individual contract or grant. Feedback from faculty engaged in the pilot will determine whether or not additional steps should be taken, including those involving OMB.