FEDERAL DEMONSTRATION PARTNERSHIP

GRIP PRE-PILOT INITIATIVE REPORT

JANUARY 27, 2013

I. GRIP INITIATIVE BACKGROUND

- The Recovery Board initiated the Grants Reporting Information Project (GRIP) to develop, test and evaluate whether the proved FederalReporting.gov system used for Recovery contracts, grants and loans could be used as a central grants reporting tool.

- GRIP Reporting includes FFATA and SF-425 financial reporting requirements.

- Each participant has been pre-registered in GRIP with their valid DUNS number, appropriate personal information and email address.

- A 9-digit FRPIN is required to submit reports against each DUNS number. For this proof-of-concept the FRPIN shall be pre-assigned for participants.

- After report submission, a Universal Award ID (UAID) will be assigned based on award information.

II. REPORTING REQUIREMENTS

- Using ARRA and FFATA reporting requirements, the proof-of-concept data model also incorporates all data elements required by OMB SF-425 (Federal Financial Report); thus enabling integration tests with Agency grant and financial reporting systems.

- Participating recipients will be reporting fourth quarter data (September 30, 2012).

- The proof-of-concept reporting will not, however, be a substitute for their normal reporting requirements.

- Participants will dual report in order to test the centralized system versus normal reporting.

III. PARTICIPANTS

- Environmental Protection Agency (Federal Agency Sponsor)
- Colorado State University (Federal Demonstration Project partner)
- University of New Mexico (Federal Demonstration Project partner)
- University of Washington (Federal Demonstration Project partner)
- University of Wisconsin (Federal Demonstration Project partner)
- CalTech
- College of Lake County (Illinois)
- Georgetown University
- University of System of North Carolina
    - UNC-Wilmington
    - NC State
- City of Bowie (Municipality)

- Nebraska (State)

IV. GRIP TIMELINE

October 1, 2012: Data Model and Environment Development Complete
October 5, 2012: Application Development Complete
October 19, 2012: Application Testing
October 21, 2012: System Deployment
October 22 - 23, 2012: User Training (Webinar)
October 24 - November 9, 2012: Recipient Reporting
November 10 - 21, 2012: Agency Review Period
November/December 2012: Project Evaluation / Results Documented

V. GRIP EVALUATION

- In order to adequately determine whether centralized reporting reduces recipient burden, an evaluation questionnaire will be developed to document all of the process steps and level of effort for current grant reporting versus GRIP reporting.

- Agencies will be asked to evaluate the relevancy and accuracy of the data: does it provide all of the necessary elements for their grant reporting systems; does it provide all of the necessary elements for their financial reporting systems; was the data easy to parse and import into the related systems.

VI. GRIP RECIPIENT ASSESSMENT SURVEY RESULTS

- The results will be published used to determine if the GRIP proof-of-concept should be expanded to a full pilot program.

- A full pilot program would seek agency partner programs committed to conducting all their reporting through a centralized reporting module for the remaining fiscal year reporting quarters.

- An expanded program could also focus more specifically on data standard development and system to system interface compatibility.

PART I: FDP GRIP PRE-PILOT INSTITUTIONS

CSU: Colorado State University
UNM: University of New Mexico
UWash: University of Washington
UWis: University of Wisconsin

PART II: QUESTIONS REGARDING NORMAL REPORTING PROCESS

Regular Reporting Process

1. # of Systems: How many different systems do you normally have to report through to file the same number of grant reports?

CSU: a) Total: 3. b) By Agency: 3. The Vendor information had to be compiled manually – suggest it not be included in reporting requirements.

UNM: a) Total 2 systems; however, the data is first collected by different groups (purchasing, accounting, pre-award) and combined into the report. Therefore more efficient data collection method would have to be explored if this was a Federal award-wide initiative. b) By Agency: 2 to 3.

UWash: a) Total: It depends on the magnitude of each report. Considering ARRA Reports, the process is almost automated through a system that collects information from four sources plus two data elements that are directly filled by PI. Beyond ARRA I am not entirely sure of what the full reporting effort looks like. We approached this effort from a "what does it take to complete GRIP" perspective. We can follow-up with the reporting experts for more details if necessary. b) By Agency: Same across the board.

UWis: a) Total: Did not have time to inventory. b) By Agency: The University of Wisconsin—Madison receives funding from almost every federal agency. We submit reports to these agencies in the required format and submission method. It is challenging to know and understand so many different reporting mechanisms.

2. Time: On average, how long does it take to compile information and report through the normal process?

CSU: 40 minutes per SF-425.

UNM: For ARRA information, it can take up to 20 to 30 minutes per award to compile for each report since its all currently completed manually.

UWash: Time and effort depends on the size of the projects. For those projects that have several sub-awards, there is an average of 8 hours while others may be faster. Budget complexity, PI availability and other required human expertise are all compounding factors.

UWis: When we submit financial reports, our grant accountants do a thorough review of the expenditures on the awards. This review is to ensure that we have only allowable and allocable charges on the awards. This analysis takes approximately 6-8 hours for each award. This time is only the time spent by the grant accountants and does not

include any time spent by departments or principal investigators responding to question or taking corrective action on the expenditures.
Once the analysis has been completed, preparing the financial report and submitting does not usually take long. For example, filing reports in eRA Commons takes less than one minute per report.

3. Process: Per Agency/Grant - What process do you normally use to report (e.g., automated system via enter web-based form, system to system, SF-425 Adobe .pdf file submission, SF- 425 Excel .xls file submission, combination)?

CSU: Most SF-425 PDF, some 425 Excel, some on web form – depends on agency.

UNM: Web-based forms, SF-425 Adobe pdf file submission, SF-425 Excel.xls file submission.

UWash: It is a semi-automated process that requires manual effort. The calculator for the 425 is a spreadsheet that contains a list of specific input. For those data elements classified as “Federal Expenditure and Unobligated Balance” and “Recipient Share”, the process of estimation requires a more complex process which is mainly manual.

UWis: Federal agencies are extremely varied in their reporting processes and requirements. Some agencies, most notably NIH and NSF, have sophisticated, back-end computer systems into which we enter our reports. Other agencies require paper SF-425 forms. NSF does provide Excel data exchange functionality. However, with NSF’s move to their new cash draw system, FFRs are no longer required. NIH is web-based reporting.
NASA is an example of an agency that has an electronic system for quarterly FFRs AND requires the same information on paper. This is duplicative and wasteful effort.
Some federal agencies are just now beginning to implement the FFR; CDC for example. The VA has not yet transitioned to the FFR.
Other agencies give inconsistent information in their Notice of Grant Awards. For example, FDP & AHRQ state in their award documents that a SF-269 is required. Yet, these must be reported in the eRA Commons as the SF-425.
USDA ARS issues awards differently depending on the office that issues the award. This results in similar awards requiring different financial reports.

4. Timing: Generally, what are your normal reporting periods (e.g., annual, semiannual, quarterly)? Are they different for financial vs program? Please also share specifics on the grants you used for this proof-of-concept.

CSU: Reporting period based on agency requirement, can be annual, semiannual (very few), or quarterly. Many are also due at end of project period, or upon close of project. Less than 50% have financial & program reporting requirements that are in sync / due at same time. POC 1=Quarterly, 2=Final. Many universities have different functional folks

involved with ARRA / FFATA reporting vs. SF-425 / 270 so unless all agencies agreed to accept same method, this would increase the reporting burden.

UNM: Time varies depending on reporting requirements. There are differences for financial vs program. Also, currently we have different groups at our instiution that take care of the different requirements (ARRA vs SF-425 vs FFATA).

UWash: The periods of reporting varies according to the sponsors. Normally, most of the projects require annual reporting, but all of the ARRA also requires quarterly reports. Specifically, 425 data is only gathered at each individual project's close.

UWis: Normal reporting requirements are determined by the terms and conditions of the funding mechanism. We have awards that require quarterly reporting. Others require annual reporting. For some awards, e.g., NIH R01 awards reporting in only required at the close out of the award. For this proof-of-concept, most of the awards reported were annual reporting. One was a quarterly report.

GRIP Reporting Process

1. ***Time: On average, how long did it take to compile information and report through the GRIP process? Please comment on whether some of the time reported was "learning curve". Please comment on whether you believe it would ultimately take less time if you knew the reports were always going to be standard across all grants and therefore make it easy to have the data compiled and ready to go.***

CSU: First submission was about 45 hours to develop queries and design xml, 2nd xml submission less than 10 minutes, last submission done on web took about 20 minutes including time to search for data. If the xml reports could be 'streamed' with many reports uploaded per session (vs. one at a time), the time savings would be substantial. The Web interface would save about 10% vs. submitting as SF-425 PDF or Excel file. If the process requires input from the research investigator on an interim progress report, that would make this method almost impossible – rather, the report should include an abstract description of the work that would not change over the reporting cycles.

UNM: For this pre-pilot and considering the awards we reported on, it didn't take more then an hour. That said, these were not very complex awards. Both had a limited amount of expenses to report and small, if any, vendor data to include. Also, we used the web form which was simple; but wouldn't be practical if we had a large number of reports to submit given our staff size. While I believe it would be better to standardize reporting, I believe that we as an institution would need to review how minimize the burden by using new methods of collecting the data from our systems. Our ARRA reports and SF425 reports are completed by two separate groups…therefore a full pilot would show more the impact over a time period on workloads.

UWash: To compile the information and submit the reports into the GRIP platform, we re-used a previous process created under ARRA for some non-standard specific sources, combined with methods used for regular fiscal reporting to Agencies. Considering both processes, the total time required for staff (not systems), was just over 45 hours. The learning curve was more noticeable in the after the sources and fields had already been identified, however, it was only around a 10% improvement. Learning curve aside, each time a person was required to carry out a task needed to generate or derive the data necessary to complete the report, there wasn't a clear and repeatable way to accomplish it, and each solution was specific to the award being reported on. We could improve this through a greater degree of standardization, but would need to spawn a major process-change initiative at the organizational level because the manual process is less impacted by standardizing the data elements. So in our current state, between 4-8 hours per award per report would be required, and likely standardized data could move that to 3-6. We have several thousand federal awards a year, so the frequency of reporting would be a major factor as well. The major spike in effort is related to the 425 which we only complete at the close of a project, not on regular calendar intervals.

UWis: The process we followed here at UW—Madison was to use already prepared financial reports. The amount of time to prepare the financial reports is listed above in Question 2. Since this was a "proof-of-concept" we created the XML files manually. If this were a real, production requirement we would program an automated system to help generate the XML files. The analysis time done by the grant accountants would not necessarily be reduced. The learning curve and difficulties in this GRIP reporting were mainly due to inconsistent documentation and systems. For example, the documentation said dates should be in one format, yet the XML actually required a different format. We would expect these issues would be worked out if the project moves forward. It's possible that we may be able to streamline our processes if ALL federal agencies have ONE STANDARD reporting requirement. Having one format that all agencies require will eliminate the need to understand the various systems and allow our grant accountants to focus more fully on stewardship of federal funds.

2. Web Form Submission: How would you rate the ease of submitting a report via the outline web form?

CSU: **6**; But would need some QA work on error messages, edits etc.

UNM: **9**; Very easy…it would be just time consuming for a large number of reports for an institution our size.

UWash: **5**; Differences between the web and XML almost required both versions to figure out how to get the data right, but this was understandable for a pre-pilot.

UWis: **n/a**; Cannot comment. UW-Madison submitted XML

3. XML Submission: How would you rate the ease of submitting a report in XML format?

CSU: **8**; (would go to 9 or 10 if data could be streamed)

UNM: **n/a**; Have not attempted yet; however, this is the direction we would be pursuing if we had to report on such a large number of federal awards.

UWash: **5**; See above comment

UWis: **6**; UW—Madison would most likely use the XML submission method for a majority of our reports. For the proof-of-concept this worked well. There were some issues with inaccurate documentation, but overall XML is a submission method that must be offered.

4. Multi-Grant Submission: How would you rate the ease of submitting reports for multiple grants at the same time (via XML submission)?

CSU: **4**; (if a stream is allowed then 9)

UNM: **n/a**; Did not attempt.

UWash: **9**; *Didn't attempt, but would be a requirement moving forward.

UWis: **4**; One of the major headaches of the ARRA reporting was the requirement to upload each report separately. Multi-grant XML submission is an absolute requirement if this initiative moves forward. We need a method to submit one XML file that may contain hundreds of awards with all types of reporting periods (e.g., quarterly as well as annual)

5. Training & Assistance: How would you rate the training, assistance and guidance you received through the process?

CSU: **9**; (would be 10 once the documentation is corrected to match edits etc).

UNM: **7**; Overall considering that this was a pre-pilot I thought it went well.

UWash: **7**; Enough to get going, and fairly straight forward.

UWis: **8**; The GRIP team took this project and proof-of-concept very seriously and offered the necessary assistance. This assistance helped the GRIP team understand where some potential difficulties may lie if this project moves forward.

6. Value: To what degree would a centralized reporting tool like this be valuable to you in your grant reporting?

CSU: **9**

UNM: **9**; As long as what's being asked for is vetted in pilot tests to make sure it doesn't cause addition burden (i.e. costs) to institutions to complete. Really should focus primarily on financial data.

UWash: **5**; Centralized reporting is desirable but several process advancements will need to be made to successfully adopt a new process.

UWis: **8**; Continuing to standardize the required reporting helps UW—Madison achieve administrative efficiencies. Centralized reporting would work if OMB requires ALL federal agencies to participate and PROHIBITS additional reporting requirements. In addition, OMB must require that NO federal agency can have "agency-specific" reporting requirements.
An example of the challenges institutions face when federal agencies have "agency-specific" requirements can be seen in the Grants.gov application process. The 424 R&R was supposed to be the federal standard application. Too many federal agencies have added "agency-specific" forms and use fields on the R&R for different purposes. These types of changes to the fields and requirements would need prohibited for this reporting to streamline administrative burden.

7. Efficiency: To what degree did you find the proof-of-concept system more or less efficient than the normal process?

CSU: **8**

UNM: **6**; Hard to determine until a real pilot is ran to see how efficient it will be.

UWash: **Unknown**; Can't say, the normal process is distributed over several experts in various department. Those experts were not available for the "pre-pilot" to provide that kind of comparative feedback. Given the timeframe, we approached it from a "can it be done", and didn't collect information on comparing the "how".

UWis: **5**; Since this was a proof-of-concept, UW—Madison did not expect to see increased efficiencies. If this were moved into production, efficiencies would be realized in the standardization of the reporting process and the ability to submit many reports at once.

PART III: GENERAL COMMENTS

1. Please share any other comments regarding your experience with the GRIP Proof-of-Concept.

CSU: Documentation should be enhanced. Adopting an Excel spreadsheet to contain 1) columns from Word data model 2) actual xml label on each row and 3) an example of

the data would be ideal. Repeating groups should be noted & color-code the rows that require end-user data vs. derived or static data. As each reporting recipient develops a method of automated reporting, it is important that the data descriptors be easily ingested into a database from an Excel file, or xml xsd source. If this pre-pilot moves forward to a full pilot involving other recipients and agency participation, we strongly recommend that the FDP be involved in an initiative parallel to the FDP-JAD team where agency reps, OMB, RATB, and recipients sit across the table from each other to openly discuss the needs of the agency and the capabilities of the recipient as well as the portal that acts as an interface between the groups. Here is a link to the JAD resource: https://sites.google.com/site/fdpera/home/jad-team as an example

UNM: Over all we are in favor of this centralized reporting method as long as it can be standardized and not require any additional items specific to agencies. The learning experience from Grants.gov is that agencies adding additional requirements really complicate and burden this process. Also, the reporting should focus more on gathering system data and less on providing narratives since it tends to be the most time consuming part of reporting.

UWash: Centralized reporting is desirable and the pre-pilot was a good start to understanding what would be required to collect data from disparate systems while applying the required expertise to submit quality data. This experience will help determine the direction of future data solutions. Presently however, several challenges exist. Multiple systems, human intervention and business process changes will all require continued improvements before enough efficiencies are in place to make the solution viable. Given our base of several thousand grants per year, any time human interaction is required this reporting scheme will be essentially unfeasible.

UWis: The goal of GRIP should be to standardize and reduce administrative burden on financial reporting. GRIP must not become an ADDITIONAL reporting requirement; it must replace other reporting requirments. Lessons learned from the ARRA reporting process should be taken into consideration if the GRIP project moves forward. For example, the Federal Demonstration Partnership (FDP) produced a report on the administrative burden of ARRA reporting: http://sites.nationalacademies.org/xpedio/groups/pgasite/documents/webpage/PGA_064718.pdf
In addition, the FDP surveyed faculty and PIs across the US. The Faculty Burden Survey highlights the increasing administrative burden being place on US researchers preventing them from spending time on the actual research projects: http://sites.nationalacademies.org/xpedio/groups/pgasite/documents/webpage/PGA_054586.pdf GRIP should take these reports seriously and continue to work with OMB and ALL federal agencies to streamline and standardize financial reporting. Generally, most institutions do not use USASpending.gov at all. Tying reporting to that system does not make sense for award recipients. In addition, it is difficult to report on information that institutions do not have on the notice of grant award (NOGA) or in their financial systems. For example, most institutions enter the grant award numbers directly off the NOGA. Apparently, the award numbers in USASpending are often in a format different than the NOGA; we have no way of knowing that. The Universal Unique

Award ID is a great idea. However, OMB must require that ALL federal agencies provide recipients that number. Recipients of federal funds must also have sufficient time to adapt their internal systems to utilize that UUID.

Specifically, there are several data elements that are challenging, time consuming to obtain, and appear to add little to no value in the financial reports:

Award Description – Should be eliminated: this narrative is not a requirement of current financial reports. Although this information is already publicly available, it adds little value to a financial report. In cases where this information is not already available in a federal website, the amount of time to obtain this from researchers can be considerable.

Project Description for Prime and Sub-recipients (Quarterly Activities) – Should be eliminated: Quarterly Activities is not a requirement of current financial reports. Obtaining this information from researchers adds substantial administrative burden and adds no value to a financial report.

Project Status –Should be eliminated: The focus of GRIP should be on financial reporting. Narrative progress reports are supplied to grant officers at the federal agencies. It is their responsibility to assess scientific progress.

Activity Code (NTEE-NPC) – Should be eliminated: It is unclear what the purpose of this coding is in a financial report. Additionally, the coding schema is too complex and it is doubtful that truly accurate data results from this data element.

Total Number of Sub-awards to individuals & Total Amount of Sub-awards to individuals – Should be eliminated: This level of specificity is not required in current financial reports.

Sub Recipient Data Total Subaward Funds Disbursed – Should be eliminated: This data element may not be as useful as the Amount of Subaward

Vendor Data Elements – Should be eliminated: This level of specificity is not required in current financial reports. There are two sections of vendor data. One within the main report that is the number of vendor payments and dollar amount under $25,000; and a separate section of specific vendor payments over $25,000. It is unclear what the value of this information is. During the instructional overview of the GRIP web reporting system, it was noted that the vendor info was optional. However, in the XML schema, vendor payments under $25,000 were required. These should be eliminated.