

# RESEARCH COMPLIANCE

News and Analysis for Colleges, Universities and Teaching Hospitals

## Research Organizations Launch ARRA Web Site

Help is on the way! For universities and others struggling to comply with the many “strings” attached to funds from the American Recovery and Reinvestment Act (ARRA), the Federal Demonstration Partnership (FDP) has launched a new Web site that provides handy links to sources of information, as well as documents created by compliance officials at universities.

FDP is working with the Council on Governmental Relations (COGR) to collect information for the site, and the two have created both a listserv for sharing information and a subcommittee to help address the many requirements, some of which are unprecedented (*RRC 2/09, p. 1*).

The funds from ARRA are now starting to flow to universities and others that have submitted successful grant applications to a variety of federal agencies, including the National Institutes of Health and the National Science Foundation.

While the data to be collected were established by the law itself, the Office of Management and Budget (OMB) has been issuing a series of memoranda with more details about what the precise requirements are and operational aspects of compliance, such as where to enter data elements. OMB issued new guidance on Aug. 18 (available at [www.recovery.gov](http://www.recovery.gov)), noting that entities may now register and begin inputting data on [www.federalreporting.gov](http://www.federalreporting.gov).

The FDP Web site contains links to the government’s missives, as well as to actual policies and procedures for compliance developed by universities. For example, the page has links to a “data matrix” created by Columbia University.

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“The FDP ARRA Web page was started because we wanted to consolidate various federal and nonfederal information sources for FDP members and the community at large,” said Lynette Arias, associate vice president for sponsored projects administration at Columbia University. “The page is still very new, but in the near future will evolve to include shared forms and materials, frequently asked questions, and more links to university and federal Web sites. The FAQs are quite extensive and have been written from a university perspective; it’s a joint activity of FDP and COGR.”

Although the federal government “has provided a fair amount of information about ARRA requirements, some of the regulations and guidance are not entirely clear ... we realize it will not be possible for the federal government to provide total clarity,” added Susan Ross, director of the Office for Sponsored Research on the Evanston campus of Northwestern University. “Having a forum to share information and ideas on how best to comply will be very helpful.”

FDP and COGR “can’t answer these questions definitively [but] we can initiate an extensive discussion on the topic so that universities can make an informed decision, and so that all available guidance on the key questions is readily available. We definitely plan to update the Web site, not only with information from federal sites, but also by including links to university resources,” Arias said.

### ARRA Is Something Different

Because of tight time lines, increased frequency of reporting, and new data elements, “ARRA compliance is a significant burden,” Ross said.

Universities also have a lack of experience with ARRA and aren’t sure what to expect. “With ARRA, we have new territory for the federal agencies and the prime recipients,” Ross said. “Further, we realize that ARRA awards will be considered ‘high risk,’ so auditors will be focusing more attention there.”

Among the issues universities are grappling with, said Pamela Webb, associate vice president for research at the University of Minnesota, is how to fund compliance activities. “Since universities are capped in what they can

recover for administrative costs and many institutions are already at the ceiling, the cost of complying with ARRA requirements — including designing and implementing systems to meet ARRA reporting obligations — must be picked up by the institutions themselves,” Webb said. “The ARRA requirements are on top of regular compliance obligations and at a time when many institutions are facing serious budget cuts.”

Another hurdle will be tracking jobs created. “Reporting on one project is easy, but coordinating this type of reporting across the board becomes a much more complex exercise,” Ross said.

But the biggest difficulty might be in simply understanding what is required and developing systems to aid compliance, Webb said.

“The most difficult challenges for universities may be in becoming fully acquainted with the ARRA regulations and then deciding how best to draw data from existing university systems,” Webb said. “Many universities already have a large number of ARRA awards, so the data mapping becomes a critical exercise in order to enable timely and accurate reporting. In some cases, such as jobs reporting, or identification of awards as being ARRA-funded, the data elements are new and must be quickly created in the university’s databases. Another challenging aspect will be coordinating subrecipient data gathering and reporting of both expenditures and jobs data in a timely manner.”

**Link:** <http://thefdp.org/ARRA%20Institutional%20Response.html>. ↵