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Sent: Monday, August 17, 2015 4:44 PM
To: cogr-l@mymaillists.usc.edu
Subject: [cogr-l] National Dialogue and DATA Act - Reducing Reporting Burden for Federal Contractors and Grantees

Dear COGR Members,

On August 3, representatives from AAU, COGR, APLU and FASEB met with OMB staff to discuss the [National Dialogue](#). Section 5 of the DATA Act stipulates that the OMB Director, in consultation with relevant Federal agencies, recipients of Federal awards, including State and local governments, and institutions of higher education, review the information required to be reported by recipients to identify common reporting elements across the Federal Government; unnecessary duplication in financial reporting; and unnecessarily burdensome reporting requirements. It requires the OMB Director to establish a pilot program to meet these goals.

The Dialogue is a means to facilitate communication with recipients of federal grants and contracts to identify and reduce duplication and burden. Among the ideas we put forth during our meeting with OMB staff, in response to a broad question on reporting burden, were reducing the number of federal payment management systems; reducing the frequency of financial reporting; piloting/implementing collaborative awards as an alternative to subrecipient monitoring; raising the micropurchase threshold from \$3,000 to \$10,000; and piloting aspects of the Uniform Guidance that have the potential to reduce administrative work associated with federal awards as part of the data collection activities included in the pilot. These include, awards of similar purpose or blended funding (200.430); fixed amount awards (200.45; 200.201); and outcome-based reporting (200.430).

In follow-up to our meeting OMB released a [blog post](#) by Howard Shelanski, Administrator of the Office of Information and Regulatory Affairs, OMB; David Mader, Acting Deputy Director for Management, OMB and Controller of the Office of Federal Financial Management; and, Anne Rung, Administrator, Office of Federal Procurement Policy, OMB. The blog post promotes the Federal Government's partnership with the Nation's colleges and universities in conducting federally funded research, noting that it is strong but perhaps not as efficient and beneficial to taxpayers as it could be. It invites institutions to share their ideas on how to reduce unnecessary duplication and burdensome reporting requirements as part of the administration's ongoing efforts to reduce burden on federal contractors and grant recipients. Following our meeting with OMB, new questions have been added to the Dialogue web page. Questions specific to recipients of [contracts](#), [grants](#), or [contracts and grants](#) are included. Current questions specific to grants include the following:

- **Question:** If you could change one thing that would ease your reporting burden associated with your grants or subgrants, what would it be (e.g., time, cost, resource burden)?
- **Question:** If you have reporting requirements to the Federal government, how are those met? (feel free to be specific about what is reported to whom and through what mechanism)
- **Question:** If you could create a central reporting portal into which you could submit all required reports, what capabilities/functions would you include?

OMB circular A-133:

- **Question:** If you could make a change to ease your reporting burden for audits under the Single Audit Act (i.e., audits required by OMB Circular A-133 which is being replaced by the Uniform Guidance 2 CFR 200 Subpart F), what one thing would you change about reporting by the auditee?
- **Question:** If you could make a change to ease your reporting burden for audits under the Single Audit Act (i.e., audits required by OMB Circular A-133 which is being replaced by the Uniform Guidance 2 CFR 200 Subpart F), what one thing would you change about reporting by the auditor?
- **Question:** If you could make a change to ease your reporting burden for audits under the Single Audit Act (i.e., audits required by OMB Circular A-133 which is being replaced by the Uniform Guidance 2 CFR 200 Subpart F), what one thing would you change about reporting to the Federal Audit Clearinghouse?

Uniform Guidance (2 CFR 200):

- **Question:** Are there requirements in the new 2 CFR 200 that need additional clarification for improved implementation with reduced administrative burden ?
- **Question:** What are the perceived burdens associated with the new standards such as the documentation of salaries & wages and time & effort (2 CFR 200.430), subrecipient monitoring (2 CFR 200.331), procurement standards (2 CFR 200.317- 2 CFR 200.324)?
- **Question:** How can the administrative burden associated with standards compliance be lowered?

Additional questions specific to contracts include:

- **Question:** Are there any reporting areas in the FAR that are similar in nature to those in Federal agency supplements?
- **Question:** What other compliance information are you providing to the Federal government outside of the procurement process that could be used in procurement reporting and reduce duplication?

OMB will seek comments over the next 4-6 weeks and review feedback in mid-October. AAU, COGR, APLU and FASEB will provide feedback via the [dialogue](#) and we will make additional information on this effort available to members over the next few days. **Institutions, and their administrative staff and PIs, are encouraged to respond to some or all of the questions posed and to comment on existing ideas, including those submitted by the associations (AAU, COGR, APLU and FASEB) and other stakeholders.**

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