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## PRD Outcomes

*by Robert Hardy*

### Introduction

On December 29, 2000 former President Clinton signed Executive Order 13185, which established ten principles that will provide the basis for the development of future Federal policies, rules, and regulations for the scientific research partnership between the Federal government and U.S. universities. This was perhaps the most important outcome of Presidential Review Directive 4 (PRD-4), a government-wide review and evaluation of the government-university research partnership which the President directed the National Science and Technology Council (NSTC) to perform in September of 1996. A multi-agency task force was established under the auspices of the NSTC to conduct the review, which in turn established an interagency working group on which the author served since its inception in the spring of 1997. This article summarizes the PRD process and discusses the significance and implications of the outcomes.

The PRD review was motivated by growing concerns expressed to former President Clinton about the increasing stresses on U.S. universities resulting from erosion in R&D support and growing administrative and regulatory burdens. As its first task, the working group gathered information from universities, university associations, and other entities including the National Science Board and Federal Demonstration Partnership as to their views of current stresses in the government-university research partnership. The group received a wide variety of responses. Many of these tended to focus on accounting/auditing issues, particularly those arising from recent changes in OMB Circular A-21 cost principles, graduate student support, regulatory issues, and inconsistencies in proposal requirements and grant terms and conditions among Federal

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## One Step Ahead

*by Alice Tangredi-Hannon and Denise Clark*

The 43rd Annual Meeting preparations are well underway. The program committee, co-chaired by Denise Clark, Cornell University and Alice Tangredi-Hannon, Brown University met on January 28th to lay down the groundwork for what promises to be a fantastic program. Broken out by broad topic areas, the program guarantees sessions devoted to pre-award, post-award, compliance, costing, national policy and regulatory initiatives, intellectual property and technology transfer, professional growth, sponsor news and open forums. Within these broad topic areas, presentations will be geared to all aspects of research administration including central, departmental, financial, eRA and medical institutional perspectives.

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See Page 15 for  
information on the  
Financial Compliance  
Video Conference!

## ERA VI "Stop Talking... Start Doing"

*by Nancy Wray and Ron Splittgerber,  
Conference Co-Chairs*

And doing we are! Mark August 17th and 18th on your calendars and get ready to visit Portland Oregon! Our program committee has been very creative in designing an exciting program where you the participant will have the opportunity to work through your ERA issues. In keeping with the theme "Stop Talking... Start Doing!" the sixth conference on Electronic Research Administration will feature discussion and networking sessions on current topics devoting one entire day on implementing solutions. The conference is targeted to those who are involved with ERA activities and have attended prior ERA workshops or conferences. For those of you who are new to ERA there will be a Primer workshop the afternoon before the start of the conference and you will need to attend in order to get the most out of the conference.

And here are the hard working creative and dedicated members of our program committee... drum roll please...from the University of Wisconsin, Lois Brako; from Cornell University, Denise Clark; from MIT, Steve Dowdy; from the University of Arkansas-LR, Sue Keehn; from Rhode Island College, Dick Keogh; from Colorado State, Jon Peterson; from Columbia University, Candi Poolman; from Rice University, Danny Powell; and from University of Illinois, Sarah Wasserman. Ron and I can not thank them enough for all their work.

Now a little about the program. The committee began by conducting an electronic survey of NCURA members then designed the conference on feedback from the results of the survey as well as attendee evaluations from previous conferences. Each of the two days has been developed around a specific theme. The first day is centered on Standards, EDI, XML, mapping and other topics related to standards. The second day's theme is Solutions, which will include electronic preaward, compliance, and outsourcing. In addition, a panel discussion of PL106/107 and Federal Electronic updates will give us the latest in initiatives at the Federal level. And come to the concurrent sessions to hear about the latest "Toys" to help us with ERA. In direct response to the survey, hands-on computer labs have been expanded and will include topics on software integration, Web design tools, database reporting tools and electronic data interchange solutions.

*(continued on page 13)*

research agencies. Perhaps the most pronounced concerns in the responses received from higher education groups and organizations had to do with cost sharing.

### **Principles**

As the working group began to analyze and discuss these issues in more detail, it became clear that developing a statement of the basic principles underlying the government-university research partnership would greatly facilitate the analysis and development of recommendations. Surprisingly, no such statement appeared to exist. While a number of principles were suggested or could be inferred from sources such as OMB Circulars, the group could find no clear articulation of the principles underlying the government-university research enterprise in any government issuance. The group felt its most important task was the development of such principles.

After considerable discussion, the group developed four “Guiding Principles” and six “Operating Principles” that it believed were critical for the future of the partnership. There was a strong degree of consensus among the working group members as to these principles. These principles were included in a draft report developed by the Working Group, which also included a variety of other action items and recommendations which are further discussed below. After discussions with the NSTC task force and the required interagency clearance, the draft report including the Principles was released by the NSTC in April of 1999. At the same time, the President released a Presidential Memorandum directing the NSTC to implement the recommendations of the report. Recognizing the report reflected the Federal Government’s view of the partnership, the White House Office of Science and Technology Policy (OSTP) and the NSTC sought comments from the academic community on the Principles and action items. Five meetings, sponsored by universities and academic associations, were held around the country. Further, the chair of the Federal Demonstration Partnership (FDP) and the President of the National Academy of Sciences sent letters to the presidents of the 65 FDP institutions asking that they comment on the report. In addition, OSTP and the NSTC sought comments on the proposed Principles with their publication in the *Federal Register* on December 21, 1999.

As a result of the comments received in this process, the working group recommended, and the task force agreed, that the principle that addressed the importance of the integration of research and education be strengthened. As noted in the Executive Order, government-supported basic research at our nation’s universities represents a dual investment in the future of the nation, helping to assure the health, security, and quality of life of our citizens while also training our future scientific and technical workforce. All other Principles remained as originally stated by the group.

The Guiding Principles as set forth in the Executive Order (available on the OSTP website at [ostp.gov/html/011001\\_3.html](http://ostp.gov/html/011001_3.html)) that “shall govern interactions between the Federal Government and universities that perform research are:

- Research is an investment in the future;
- The integration of research and education is vital;
- Excellence is promoted when investments are guided by merit review;
- Research must be conducted with integrity.

The Operating Principles that shall assist agencies, universities, individual researchers, and auditing and regulatory bodies in implementing the Guiding Principles are:

- Agency cost sharing policies and practices must be transparent;
- Partners should respect the merit review process;
- Agencies and universities should manage research in a cost-efficient manner;
- Accountability and accounting are not the same;
- The benefits of simplicity in policies and practices should be weighed against the costs;
- Change should be justified by need and the process made transparent.”

### **Actions to Strengthen the Partnership**

The responses received by the group also led it to identify a number of areas where actions were needed to strengthen the government-university research partnership. Input to the group affirmed the importance of the link between research and education, and the group felt the report needed to include a strong statement as to the vital and dual roles of students, as both researchers who contribute to the national research enterprise, and as students, who gain research experience as part of their training as future scientists and engineers. This duality must be recognized and reflected in government policies and practices. In addition, the NSTC task force strongly reaffirmed to the group that developing a highly trained and motivated workforce for the 21st century requires that the best and brightest students from varying cultural, ethnic, and socioeconomic origins are prepared for and choose to pursue careers in science and technology.

All of these concepts were reflected in the final PRD-4 report, which was published by OSTP on January 10, 2001 (available at [ostp.gov/html/NSTC2001.pdf](http://ostp.gov/html/NSTC2001.pdf)). In addition to the Principles, the report sets forth a series of action items from the April, 1999 draft version, and discusses their implementation. It is important to view the PRD more as a work in process than as a series of defined outcomes resulting from a final product. In some cases, policies influenced by the PRD were developed and/or issued well in advance of the final report. For example, the National Science Foundation (NSF) issued a new policy on cost sharing in June of 1999, which was directly responsive to the cost sharing recommendations developed during the working group’s deliberations (and reflected in the draft report a couple of months earlier). Other specific outcomes discussed below (e.g. research misconduct) also preceded issuance of the final report. These outcomes also resulted from the deliberations of the working group, OSTP, NSTC and OMB during the PRD process, rather than as a result of the report itself. Indeed, the January 10 “final” report was not necessarily developed as a public document, and never edited to reflect the actual outcomes discussed in this article. The following discussion of the actions recommended in the report needs to be understood in this context.

The initial action item discussed in the report has to do with the integration of research and education. The 1999 draft report called for Federal agencies and universities to explore mechanisms and experiment with programs that catalyze the integration of research and education on campus and aid students in their transition to becoming members of the scientific and engineering workforce. It also indicated that the NSTC would review government policies and practices to ensure that agencies are able to support students in a manner consistent with their dual roles as researchers and students, and would recommend changes as necessary. The final report indicates that this review clarified that

the federal policy on support of graduate students participating in federally funded research projects is to provide a reasonable amount of support (such as tuition remission) on the basis of the individual's participation in the project. In recognition of the dual role of students, the report states that *this policy is not contingent on an employer-employee relationship between the institution and the graduate student*. It recommends a memorandum of clarification be issued to OMB Circular A-21 accordingly.

On the highly contentious issue of cost sharing, the report contains a number of recommended actions. First, it recommends that research agencies consider a variety of approaches to communicate information to universities more clearly and consistently about agency cost sharing policies, practices, and expectations, citing the NSF 1999 cost sharing policy change as an example. Second, building on an action item in the draft report, it recommends that OMB issue a memorandum clarifying OMB Circular A-21 to state that voluntary uncommitted effort by faculty should not be included in the organized research base for computing facilities and administrative (F&A) rates or to be reflected in any allocation of F&A costs. Third, the draft report had stated that the NSTC would assess the impact of provisions that limit reimbursement of research costs on otherwise allowable costs (such as indirect or F&A cost limitations). However, the final report merely recommends that OSTP and the NSTC participate in any future efforts to assess the impact of cost limitations on research.

The report also addresses research integrity as an action item. The draft report had indicated that the NSTC would complete the process initiated in 1996 to develop a government-wide definition of research misconduct and guidelines for handling cases of alleged research misconduct. The final report endorses the ongoing efforts to issue a final policy on research misconduct.

Grant administration is addressed at length in the report. The draft report had indicated that NSTC would establish an interagency group to develop terms and conditions that will reduce differences in grant administration policy and practice across Federal agencies, based on those developed by the FDP. It encouraged agencies to reduce agency-specific requirements and work together to coordinate a "common face" to the university community in the development of ERA systems. The final report recommends that the A-110 Interagency Working Group chaired by OMB and HHS develop terms and conditions for government-wide use, with reference to the FDP General Terms and Conditions. It also contains an extended discussion of a Common Face for Electronic Business Administration. The bottom line is the need to formally commit the federal government to adopt the "Federal Commons" concept developed by the FDP and the Interagency Electronic Grants Committee as a priority management objective, with assignment of needed authority and responsibility and identification and dedication of the necessary resources. Toward this end, the report recommends designating a Federal Commons project office, developing a detailed Federal Commons implementation plan, and requiring that agencies' participation in the Federal Commons be included in each agencies' implementation plans required under the Federal Financial Assistance Management Improvement Act (P.L. 106-107). Ultimately the aim is to create a uniform means for states, tribal and local governments, universities, and other nonprofit organizations to exchange information electronically with the federal agencies from which they receive grants and contracts for research and other programs.

The report contains a number of other recommendations dealing with merit review, federally-mandated changes in university business practices, regulation of research, and the promotion of excellent science and environmental stewardship. The draft report called for establishment by the NSTC of a standing interagency working group dedicated to continuing review and assessment of the government-

university partnership, as well as an outside advisory group for this purpose. It identified a number of areas requiring further review, including intellectual property rights in university-industry-government research collaborations; identification of best practices of individual universities or agencies, and Y2K activities. The final report recommended that the Executive Order that articulated the principles of the partnership also require OSTP and the NSTC to conduct periodic reviews.

## **Specific Outcomes**

There have been a great number of reports produced over the years by various groups bearing on issues in the government-university research relationship. For example, the Federal Coordinating Council for Science, Engineering and Technology (a predecessor of the NSTC) issued a report entitled *In the National Interest: The Federal Government and Research-Intensive Universities* in December of 1992. That Report, while more descriptive in nature, also contained recommendations pertaining to issues such as cost sharing, merit review, human resource development, more uniform Federal administrative requirements, and research cost accounting. As another example, some twenty years ago a report was issued by the National Commission on Research entitled *Accountability: Restoring the Quality of the Partnership*. That Report contains discussion of issues such as accounting for faculty effort on federally supported research that is remarkably similar to the PRD-4 Report. Why is there any grounds to believe the PRD-4 Report will accomplish anything more than adding to the weight of these other reports on many bookshelves (or filling more computer files)?

For one thing, none of these earlier reports was at the level of a Presidential Review Directive. PRD's are relatively unusual and tend to be decision-oriented. PRD-4 reflects both high level concerns about increased stresses in the relationship between the federal government and research universities, and an appreciation for the critical nature of this relationship in assuring our country's future health and economic well-being.

But perhaps even more importantly, as noted above PRD-4 already has resulted in some concrete outcomes. The Executive Order issued on December 29, 2000 to *Strengthen the Federal Government-University Research Partnership* already was discussed. There have been a number of other specific results. On December 6, 2000 OSTP issued a new, final government-wide policy addressing research misconduct, as called for in the PRD report. The policy defines research misconduct and establishes basic guidelines for the conduct of fair and timely investigations of alleged or suspected infractions. The policy applies to federally-funded research regardless of where the research is conducted or by whom. Agencies have one year to implement the policy. Once implemented, the policy will establish uniformity among the federal agencies' definition of research misconduct and consistency in their processes for responding to allegations of research misconduct. Additionally, the policy provides clear guidance to the research community about the government requirements needed to sustain public trust in our publicly-funded scientific and engineering enterprise.

Another very significant result was the issuance by OMB on January 5, 2001 of a *Memorandum of Clarification of OMB A-21 Treatment of Voluntary Uncommitted Cost Sharing and Tuition Remission Costs* (available at [www.whitehouse.gov/omb/memoranda/m01-06.html](http://www.whitehouse.gov/omb/memoranda/m01-06.html)). That memorandum clarifies the treatment of voluntary uncommitted cost sharing faculty effort in the computation of facilities and administrative costs rates. It states that such voluntary uncommitted cost sharing should be treated differently from committed effort and should not be included in the organized research base for computing the F&A rate or reflected in any allocation of F&A costs.

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Furthermore, such faculty effort is excluded from the A-21 effort reporting requirements. There are some qualifications in the memorandum: when an institution reduces a faculty member's level of activities dedicated to other institutional responsibilities in order to shift his/her activities to organized research activities, the institution must reflect this reduction in the payroll distribution system (as an increase to the research effort component) and in F&A proposals. Also, the memorandum indicates that most federally-funded research programs (with some exceptions) should have some level of committed faculty effort, paid or unpaid by the federal government, and that such effort shall not be excluded from the organized research base by declaring it to be voluntary uncommitted cost sharing. Otherwise an estimated amount must be computed by the university and included in the organized research base. The memorandum concludes by indicating that in the future, OMB and the research agencies will evaluate the impact on committed cost sharing of this clarification memorandum.

The actual effect of these qualifications remains to be seen. The future evaluation (which OMB plans to perform in approximately two years) may lead to other changes. However, this clarification should greatly reduce one of the major current stresses in the government-university partnership in the cost sharing area, and help eliminate what had become a disincentive for institutions to have their faculty donate additional effort beyond that formally committed to federally supported research.

Similar effects can be expected from the other subject addressed in the OMB clarification memorandum: tuition remission. The memorandum establishes that federal policy on support of graduate students participating in research projects is to provide a reasonable amount of support (tuition remission and other support) on the basis of the individual's participation in the project, citing the fact the students are fulfilling a vital role both as students and as researchers. The memorandum states, in furtherance of the NSTC final report, that "This policy is not contingent on there being an employer-employee relationship, for tax purposes, between the institution and the graduate student." In further discussion, the memorandum indicates "OMB in the Circular (A-21) did not intend to tie the allowability of tuition remission costs to how they are treated for tax purposes...In recognition of the dual role of students...engaged in research...tuition remission and other forms of reasonable support that are associated with student status ...are allowable provided that (1) the individual is conducting activities necessary to the sponsored agreement; (2) tuition remission and other support are provided in accordance with established educational institutional policy and consistently provided in a like manner to students in return for similar activities conducted in non-sponsored as well as sponsored activities, and (3) during the academic period, the student is enrolled in an advanced degree program at a grantee or affiliated institution and the activities of the student in relation to the federally-sponsored research project are related to the degree program. Accordingly, tuition remission and other forms of support that satisfy these criteria are allowable, regardless of whether the tuition remission or other form of support qualifies as wages for tax purposes."

This clarification is squarely in accordance with the final report recommendation. It provides a clear affirmation of the PRD principle that the integration of research and education is vital, and is an illustration of how the PRD principles may be applied in the development of federal policies.

### **Outlook**

The press release which accompanied the issuance of Executive Order 13185 noted that taken as a whole, the actions called for in the PRD report addressed three main recommendations for improvement in the government-university research partnership:

1. To establish a common set of principles, guiding and operating, that articulate the framework for the development of federal policies related to the partnership.
2. To reaffirm the importance of the integration of research and education (i.e. the dual role of students) and the principle of merit review in awarding research funds.
3. To streamline the administrative requirements for the conduct of research at universities.

Obviously, much remains to be done in improving and strengthening the partnership. A number of the action recommendations in the report have yet to result in specific implementations. Also, tradeoffs were made in the interagency discussions and deliberations of the draft recommendations. The final report backs off action recommendations in some areas that were extensively discussed by the working group, such as specific limitations on otherwise allowable research costs. Other areas have already been somewhat overtaken by events, for example, P.L. 106-107 on "common face" issues.

Still, the PRD process and outcomes to date should be viewed as a clear "win" for the research community. And the process is not necessarily over. Executive Order 13185 calls for a regular review by OSTP and the NSTC of the government-university research partnership, and for each research agency to regularly review its existing policies and procedures to ensure that they meet the spirit and intent of the guiding and operating principles. The hope is that the PRD will be a "living document," and provide leverage for OSTP and the federal research agencies when future government policy changes are considered that affect the government-university research partnership. With this framework in place, and despite the change in Administrations, hopefully PRD-4 will continue to contribute to our common goal of enabling the U.S. university research system to continue to be the finest in the world, and to assure the system of federal research funding functions optimally for this purpose.

*Robert Hardy is currently the Director, Division of Contracts, Policy & Oversight at the National Science Foundation. On April 2, 2001, Bob becomes an Associate Director for the Council on Governmental Relations (COGR).*

***See Financial  
Corner on  
Page 6 for  
related PRD  
information!***

# Reinvention Redux

We all remember former Vice-President Gore's main focus in the early days of the first Clinton presidency – reinventing government through the National Performance Review. And to his credit, an infrastructure was built within the executive branch that honestly attempted to effect change in the way the government operated to make it more efficient. The following passage from the 1993 Report of the National Performance Review (NPR) bears repeating, as it is the best description I have read of regulatory accretion and why it happens:

“In Washington’s highly politicized world, the greatest risk is not that programs will perform poorly, but that a scandal will erupt. Scandals are front page news, while routine failure is ignored. Hence control system after control system is piled up to minimize the risk of scandal. The budget system, the personnel rules, the procurement process, the inspectors general – all are designed to prevent the tiniest misstep. We assume we can’t trust employees to make decisions, so we spell out in precise detail how they must do virtually everything, and then audit them to ensure that they have obeyed every rule. The slightest deviation prompts new regulations and even more audits. Indeed the federal government spends billions of dollars paying people who control, check up on, or investigate others – supervisors, headquarters staff, budget officers, personnel officers, procurement officers, and staffs of the General Accounting Office and the inspectors general. Not all this money is wasted, of course. But the real waste is no doubt larger, because the endless regulations and layers of controls consume every employee’s time. Who pays? The taxpayer.”

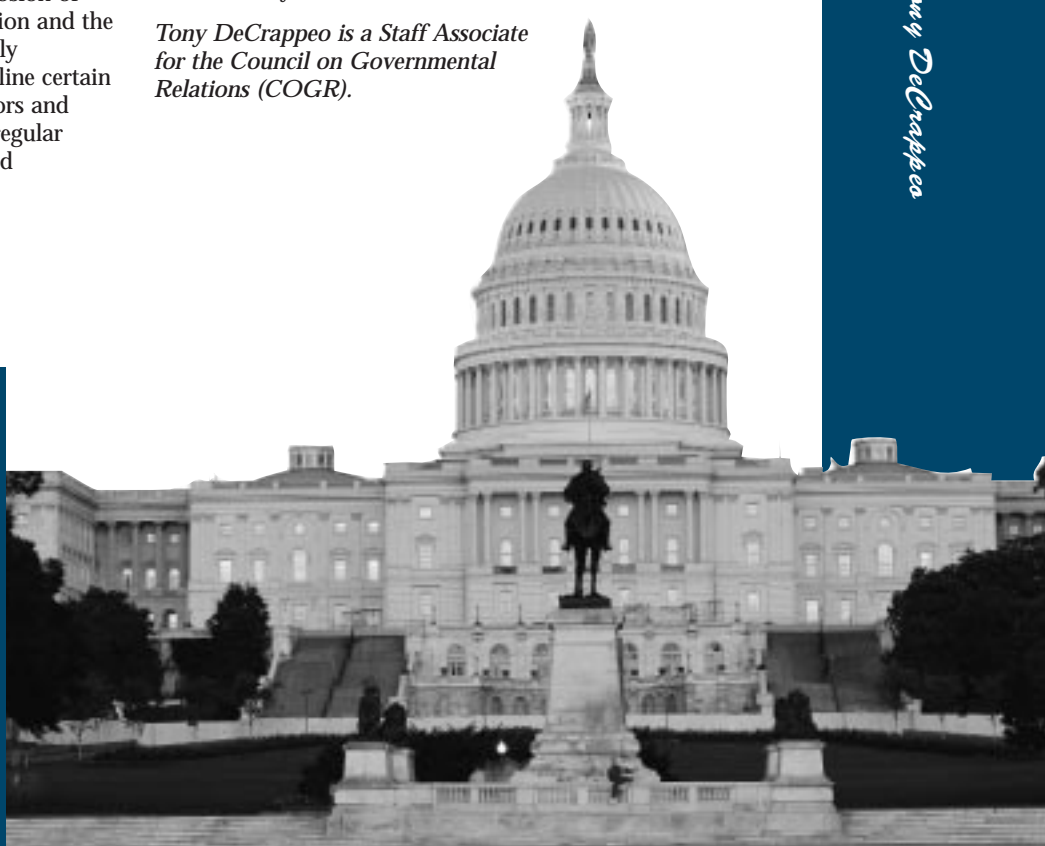
Sound familiar? So given this well-stated recognition of the problem, how successful was the reinvention effort? At best one would have to conclude it was a mixed bag. On a macro scale the total government work force has actually been reduced, so that would be considered by some a success by itself. Also, the NPR effort coincided with the explosion of the development and use of electronic communication and the Internet. These technologies were for enthusiastically embraced within some agencies as a way to streamline certain government operations and interactions with vendors and benefits recipients. Many agencies also conducted regular surveys of their “customers” and often implemented improved processes based on the results.

However, created as a quasi-independent unit appended to the vice president’s office, the campaign to reinvent the government operated with enormous autonomy and little accountability. Its directives were kept in virtual space at a web site ([www.npr.gov](http://www.npr.gov)), whose days were numbered when the new administration arrived. Convinced that statutory reform was either impossible or unnecessary, the vice-president’s team was left with a number of weak devices for spurring change. Reinventing was poorly linked to the employee performance appraisal process, and carried few, if any, budgetary or personnel consequences. It simply did not matter to the things that matter to agencies—money and headcounts. Federal employees could earn Hammer Awards for reinventing government, but not bigger budgets or a more forgiving congressional committee. This is not to argue that such awards are meaningless to those employees. But absent durable reforms, awards can sometimes serve to remind employees that they have achieved success more in spite of their organizations than because of them.

The question now is whether reinvention, in some form or other, will live on in the federal agencies and employees Mr. Gore worked so hard to change. This will be difficult, given the shift in political power in the White House and the accompanying change in Cabinet and sub-Cabinet appointees in all the federal agencies. Exacerbating the problem is the departure from the government of many of the senior career agency officials who were most directly engaged in reinvention activities – a concern voiced by the GAO in a special report to Congress on the federal workforce.

For those of us engaged in research administration, this means it will be more important than ever to work through associations like NCURA, COGR, FDP and others to establish professional relationships with key agency officials, and to participate in the education of not only university research administrators but also the new cohort of federal officials that will be stepping into the void. As the saying goes, “those who forget history are doomed to repeat it”. There are enough new battles to fight without, in General George S. Patton’s words, “spilling blood on ground we’ve already won”.

*Tony DeCrappeo is a Staff Associate for the Council on Governmental Relations (COGR).*



In Washington’s highly politicized world, the greatest risk is not that programs will perform poorly, but that a scandal will erupt. Scandals are front page news, while routine failure is ignored. Hence control system after control system is piled up to minimize the risk of scandal.



## OMB CLARIFICATION MEMORANDUM

### *on Voluntary Uncommitted Cost Sharing & Tuition Remission Costs:*

#### *A Clarification But Some Confusion Remains*

*by Jack Beaudoin, Carol H. Berdar, Frank Zuraf*

On January 5, 2001 the Office of Management and Budget (OMB) issued an important memorandum (M-01-06) clarifying the treatment of voluntary uncommitted cost sharing effort and tuition remission costs in accordance with OMB Circular A-21, "Cost Principles for Educational Institutions." The memorandum complies with the National Science and Technology Council's (NSTC) recommendation to improve the government-university research partnership.

Although the OMB memorandum clarifies to some extent the subject requirements, it also presents educational institutions with certain statements that may be subject to different interpretations – especially those related to cost sharing. Little has really changed: voluntary uncommitted cost sharing refers only to cost sharing that is not included in grant applications and/or related budgets; reporting requirements related to cost sharing situations in Section J.8. of Circular A-21 are still in effect, and application of tuition remission must be balanced with the Internal Revenue Service (IRS) regulations and OMB guidance. It appears that only those institutions that do not document (commit to) cost sharing in their grant applications and/or budgets will see a significant change to their practices.

This article provides a brief background, including the purpose, issue, and clarification, for each topic as defined in the OMB memorandum. It also highlights two of the confusing statements related to the cost sharing topic, along with an informal explanation from the DHHS Department of Cost Allocation (DCA).

## OMB CLARIFICATION MEMORANDUM

A brief background summary of each topic, as defined in the OMB clarification memorandum, is described below.

### **Voluntary Uncommitted Cost Sharing Effort:**

- addresses the treatment of voluntary uncommitted cost sharing effort in the computation of facilities and administrative (F&A) rates in accordance with Circular A-21 (Section C.4.), and defines voluntary uncommitted cost sharing effort as university faculty (including senior researchers) effort that is over and above that which is committed and budgeted for in a sponsored agreement.
- identifies the issue in connection with the Circular A-21 Cost Accounting Standards as interpreted by some federal government officials to require the assignment of a proportionate share of F&A costs to the voluntary uncommitted cost sharing effort by including an estimated amount in the organized research base, or by adjusting the allocation of facility costs related to the effort.
- clarifies that voluntary uncommitted cost sharing effort should be treated differently from committed effort, and need not be included in the organized research base for computing the F&A rate, or reflected in any allocation of F&A costs.
- notes the current Circular A-21 payroll distribution provisions (Section J.8.b.) require that the apportionment of salaries and wages must be supported by a payroll system that "will encompass both the sponsored and all other activities on an integrated basis."
- states that most federally funded research programs should have some level of committed faculty (or senior researchers) effort, paid or unpaid by the federal government. It is important to note that committed faculty effort must not be excluded from the organized research base by declaring it as voluntary uncommitted cost sharing.
- prospectively applies the clarification to future sponsored agreements and F&A proposal submissions, does not require adjustments to current sponsored agreements or negotiated F&A rate proposals, and will not affect the calculation of prior years' carry-forward amounts.

### **Tuition Remission Costs:**

- addresses tuition remission costs for graduate students charged to federal programs in accordance with Circular A-21 (Sections J.41 and A.2.c.)
- explains that the "bona fide employer-employee" relationship does not mean tuition remission costs are allowable only if the graduate student is treated as an employee for the purposes of the IRS code and regulations.
- states that the federal policy supporting graduate students participating in research projects provides for a reasonable level of support based on the individual's participation in the project. It is important to note that the policy is not contingent on an employer-employee relationship, for tax purposes, between the institution and the graduate student. Rather, the policy recognizes the reality that research activities are an essential component of the individual's educational activities.

*Be sure to check  
out the PRD  
Outcomes article  
on Page 1!*

- clarifies that OMB did not intend to tie the allowability of tuition remission costs to their treatment for tax purposes, and recognizes the dual role of students (as both students and researchers) engaged in research and the resulting benefits to sponsored agreements and the research enterprise.
- allows tuition remission and other forms of reasonable support associated with students participating in the necessary work of a sponsored agreement according to three specific conditions. It is important to note that tuition remission satisfying these conditions is allowable, regardless of whether or not the tuition remission or other forms of support qualify as wages for tax purposes.

## SOME CONFUSION REMAINS

Despite its success in clarifying most of the requirements related to cost sharing, the OMB memorandum contains several statements open to interpretation. Two thought-provoking illustrations related to the voluntary uncommitted cost sharing topic are provided for the reader to ponder, followed by an informal explanation from the DHHS DCA that attempts to further clarify the provisions in question.

- OMB says in the clarification that uncommitted voluntary cost sharing will no longer be included in the research base, then it goes on to say that: "As such when an institution reduces a faculty member's level of activities dedicated to other institutional responsibilities in order to shift his/her activities to organized research activities, the institution must reflect this reduction in the payroll distribution system (as an increase to the research effort component) and in the F&A proposals." (Clarification, 2nd paragraph)

DHHS DCA explained that the clarification reminds educational institutions that they are still responsible for accounting for the time and effort of individuals (Circular A-21, Section J.8.b.). In this

regard, if there is a material change in activity (e.g., more than 5%) for an individual, any shifting of time away from other institutional activities to research must be reflected in the effort reporting system and also in the F&A rate calculation.

- OMB states that uncommitted voluntary cost sharing will no longer be included in the organized research base. The clarification goes on to say that: "If a research sponsored agreement shows no faculty (or senior researchers) effort, paid or unpaid by the Federal Government, an estimated amount must be computed by the university and included in the organized research base." (Clarification, 3rd paragraph)

DHHS DCA explained that some level of effort (e.g., cost sharing) is required by the federal government and should be included in the research base. The federal government has concluded that if a grant requires performance by an individual(s), some effort should be reported whether it is paid or unpaid. This effort should not be considered uncommitted for F&A rate calculation purposes. The federal government remains silent regarding what is considered an acceptable minimum amount of committed effort.

## ADDITIONAL INFORMATION

For the complete text of the January 5, 2001 OMB memorandum (M-01-06) visit the OMB Web site, the Grants Management Page, and Current Policy Documents of Interest: <http://www.whitehouse.gov/omb/grants/index.html>

For any questions regarding the OMB memorandum contact Gilbert Tran, Office of Federal Financial Management: (p) 202-395-3052

*This article was written as a shared collaboration by Jack Beaudoin, Associate Director Cost Analysis, Carol H. Berdar, Compliance Specialist, and Frank Zuraf, Vice President Internal Audit, at The Research Foundation of State University of New York.*

## One Step Ahead (continued from the cover)

This year's program committee is certainly a dynamic group. Joining us on the committee are: Janice Anderson (Princeton University), Cindy Burroughs (University of Georgia - Athens), Milton Cole (Villanova University), Tony DeCrappeo (Council on Governmental Relations), Marti Dunne (New York University), Steve Erickson (Boston College), Steve Hansen (Southern Illinois University at Edwardsville), Jean Humphries, Workshop Coordinator (Arizona State University East), Gunta Lidars (University of Rochester), David Mayo (University of California - Santa Barbara), Julie Norris (Massachusetts Institute of Technology), Chuck Paoletti (Office of Naval Research), Andy Rudczynski (University of Pennsylvania), Ada Sue Selwitz (University of Kentucky), Barbara Siegel (Northwestern University), Cindy White (Washington University), Marianne Rinaldo Woods, Deputy Workshop Coordinator (University of Texas at Arlington), Jane Youngers (University of Texas Health Science Center at San Antonio), and Carol Zuiches (University of Washington).

On behalf of the entire program committee we look forward to your joining us in Washington from November 12 - 15, 2001 for the NCURA 43rd Annual Meeting.

Watch for our future articles as we unveil what new twists will be added to a program that is "One Step Ahead".

*Alice Tangredi-Hannon is the Director, Office of Research Administration at Brown University and Denise Clark is the Director, Office of Sponsored Programs at Cornell University.*



*Alice Tangredi-Hannon and Denise Clark working intently with their 43rd Annual Meeting Program Committee.*





## REGION I New England

It's the beginning of February and a quiet time here in Region I. The Region I Program Committee, Co-Chaired by Vivian Holmes and Louise Griffin are busy putting the final touches on the Spring program in Burlington, Vermont. NCURA Region I is also sponsoring the NSF Regional Grants Conference as part of our Spring meeting and we are working with Jean Feldman to get this ready, too. As many of you now know due to a conflict with another meeting we had to change the dates of our Spring meeting. The new dates are April 29 - May 2, 2001. This information was recently sent out on the Region I listserv, however, if you are not a member of the listserv you missed the notice.

The NSF conference will follow the NCURA Region I Spring meeting and begin Wednesday afternoon May 2 with FastLane workshops followed by the conference program Thursday, May 3 and continuing through noon on Friday, May 4. Look for upcoming announcements that the programs have been posted to the Region I website.

Our RADG meeting continue through the winter months which gives us all an opportunity to come out of hibernation and visit with each other. Beth Mora and her team at Harvard University presented its recently implemented Oracle financial system at our meeting in January. For our March 14th meeting, Marcia Smith, MGH, is putting together a panel to update us on FDP happenings. The registration form has been posted to the website. Our May 9th RADG meeting topic is still open so if anyone has any ideas give me a call or send me an email.

The Region I listserv has become a very useful communication tool and after a rocky start, we now know not to use the reply key to send email notices to others, it is now being used to keep us informed of happenings in Region I. We will be sending out announcements soon for the Region I Merit Award and Bernard McLane Travel

Awards. If you would like to nominate someone for the Merit Award please pass along their name to any member of the Advisory Committee.

Take care, Region I and remember sign up for the Region I listserv and Spring is coming!

*Bill Corbett is Chair of Region I and is the Director of Research Administration, Dana-Farber Cancer Institute*

## REGION II Mid-Atlantic

The Region II Spring Meeting plans are final. As this is written, the program is available on our web site at <http://www.osp.cornell.edu/RegionII2001/>. The meeting, "2001 - A Research Odyssey: Navigating in a Changing Federal Universe" will be held in Hershey Pennsylvania, April 29-May 1, 2001.

With several sessions devoted to the Responsible Conduct of Research, a presentation focused on Public Law 106-107 (Federal Financial Assistance Management Improvement Act of 1999), and other federal updates, the program committee has done a wonderful job bringing federal representatives to the table alongside NCURA volunteers. Other offerings include a "World Class Leadership" workshop, led by Dr. Wiley W. Souba, of Penn State, aimed at mid- to senior level individuals, and "Cost Sharing and Effort Reporting", a workshop led by Robert Killoren of Penn State, and Robert Hardy of COGR.

Denise Clark, Cornell University, and Charlie Kaars, SUNY Buffalo have worked hard to bring us a program featuring up-to-the-minute topics, involving many new volunteers in the effort. You will also have plenty of time for informal networking, including dining while being entertained at our Monday evening dinner event at the Hershey Hotel.

If you haven't yet visited the conference website, designed by Tammy Custer Ordway, you can go there to check out the program, register on-line, and get a glimpse of what the Hershey Resort has to offer. This year, we are offering day registration, in addition to full conference registration, for those of you who prefer this option. The regional meeting has traditionally been the place to help new members become involved in NCURA, and we look forward to greeting new folks and catching up with old

friends in a relaxed atmosphere. Make your reservations now!

*Betty Farbman is the Chair of Region II and serves as the Director, Office of Grants and Sponsored Research, St. John's University.*

## REGION III Southeastern

LAGO MAR RESORT in FT. LAUDERDALE, a favorite meeting place for Region III'ers, is the site for Region III's upcoming Spring Meeting. The Program Committee has put in a lot of hard work to make this an exciting program.

The committee includes: Chair Phil Myers, Western Kentucky University; Richard Moore, Coastal Carolina University; Rosemary Ruff, Auburn University; Rebecca Sharpe, Middle Tennessee State University; Bonnie Smith, Western Kentucky University; Sarah Smith, North Carolina State University; Mary Watson, Valdosta State University; Douglas Backman, University of Alabama; M. J. Carver, University of North Carolina at Wilmington.

Four workshops will be offered Sunday, May 6: "What Post-Award Needs to Know About Pre-Award" (Presenters: Julie Norris, Massachusetts Institute of Technology, and Jane Youngers, University of Texas Health Science Center at San Antonio); "Professional Development" (Presenters: Julie Cole, Wake Forest University, and Pam Whitlock, University of North Carolina at Wilmington); "Fundamentals of Compliance" (Presenter: Jerry Fife, Vanderbilt University); and "Planning Ahead-Electronic Tools that Aid in Achieving Compliance" (Presenter: Pamela Webb, Chicago Campus, Northwestern University).

Monday, May 7, the meeting will kick off with the keynote address by Ms. Ann B. Salamone, Chief Operating Officer at the Enterprise Development Corporation. Monday through Wednesday, fifteen concurrent sessions, including areas for pre and post award, compliance, electronic research administration and professional development will be offered, as well as, a split out session for round table discussions.

You don't want to miss this-so mark your calendars for May 5-9-go to the regional website to get registration and program information-make your arrangements to attend.

As I am writing this, Region III's election for Chair-Elect and the site for the 2003 spring meeting is in progress. A huge THANK YOU goes out to Tim Conlon, University of Virginia, and Tim Atkinson, University of Arkansas for Medical Sciences, for accepting the nomination and for their willingness to serve our region in such a demanding capacity.

I look forward to seeing you all in Ft. Lauderdale.

*Olivia Pope is Region III's Chair and serves as Director; Sponsored Research Services at Florida State University.*

## REGION IV Mid-America

Region IV is continuously striving to improve itself with the goal of meeting the needs of a new age in research administration. Region IV News—now electronic only—is one example. The winter issue highlights national NCURA initiatives as well as opportunities to volunteer and to be recognized. Region IV has focused its attention on:

**Trail Blazing.** Never mind that we have fax machines, pagers, voice mail, e-mail and express mail. The information age still offers daily challenges to effectively communicating with our constituents. Undaunted by this challenge, the national NCURA, under the leadership of Region IV's Pamela Webb, our national Secretary, is addressing this very real need—to provide information that is relevant and timely. Expect NCURA to pioneer communication methods that will serve as models for exchanging information at your institutions. You may want to be a part of this pioneering effort. See Communication: The Keys to NCURA in the Region IV newsletter (<http://www.udmercy.edu/ncura4/news06c.pdf>).

**Identifying the Best of the Best.** We know our volunteers are bright, talented, and determined to make a difference. And we want to recognize them for their often unsung efforts. Do you know a Region IV member who has demonstrated excellence in innovation or service in ways that bring special credit to his/her institution or NCURA? It might have been a single achievement, or an activity or contributions completed over a period of time. Whatever the case, through Region IV's award programs, individuals can earn our applause and our gratitude. I encourage you to nominate someone for the 2001 awards. Questions? Read Joanne Altieri's article, "Your Nominations Needed for Regional Awards," or contact Joanne directly. Oh, and celebrate with our 2000 award winners featured in "Region IV Honors Awardees."

You can find both articles under Newsletters, Winter issue at the Region IV Web site (<http://www.udmercy.edu/ncura4>).

Our Spring Annual Meeting, scheduled for April 28–May 1, 2001 in Minneapolis, is another example of meeting our members' needs. Join us in our efforts to train new and to support experienced research administrators.

*Kathleen Diaz Taggart is Region IV's Chair and serves as Director, Grants Administration, Creighton University.*

## REGION V Southwestern

Region V's amended By-Laws have passed! As a result, we are now in the process of constituting a number of Regional committees, as stipulated by the new By-Laws: Nominating, Membership and Hospitality, Awards, Travel Scholarship, Publications and Communications, and Finance. Committee membership will be posted on the Region V website (compliments of David Wright and the Web Committee), which is accessible from the NCURA national website ([www.ncura.edu](http://www.ncura.edu)) or by accessing it directly, <http://research.utmb.edu/ncura/>

Soon, you will receive a call for nominations from the Nominating Committee (Greg Foxworth, chair) for the following Region V positions:

- Vice Chair
- Secretary
- Region V Member of the Board of Directors
- Three Region V Executive Committee members (1 year term)

The Nominating Committee will greatly appreciate your help in nominating Region V members who would make good leaders for our organization.

You will also soon be receiving call for nominations for:

- Travel Scholarship
- Distinguished Region V Service Award

As Immediate Past Chair, Laura Wade is chairing both the Travel Scholarship Committee and the Awards Committee. She and her committees will appreciate receiving your nominations for these commendations. Since this is the first year we will have a Distinguished Region V Service Award, it is a particularly special event. The Award will be presented at the Spring meeting Awards Banquet.

And, speaking of the Spring meeting... Sondra Ferstl, Vice Chair of Region V, is

busy planning the Spring 2001 meeting which will be held at the Westin Hotel, located in the heart of downtown Oklahoma City from Sunday, April 29 through Wednesday, May 2. The Hotel is in walking distance to the Myriad Botanical Gardens, the historic Bricktown entertainment district and the Southwestern Bell Bricktown Ballpark. Conference registration fees will cover an outing to see the Oklahoma Redhawks play another AAA baseball rival on Sunday afternoon. Sondra and her Program Committee have worked hard to develop a program that will appeal to all members—those new to the field and those with many years of experience. We hope to see you there!

*Susan Krause is Chair of Region V and Director, Program Development, Texas Children's Cancer Center and Hematology Service/Baylor College of Medicine.*

## REGION VI Western

Lots of activity has occurred in our region since the last issue of the NCURA Newsletter. We concluded our first election under our new by-laws. Dan Nordquist, Washington State University was selected as Chair-elect; Cece Manoochehri, California Institute of Technology was selected as Secretary-Treasurer-elect; Barry Dorfman, California State Polytechnic University-Pomona is a new member of the Regional Advisory Committee (RAC); and Paula Burkhart is the region's representative on the National Board. Gary Chaffins, University of Oregon, is a newly appointed member of the RAC.

Since Hal Gollos has left our region, Dan immediately moved up from Chair-elect to Chair. We are currently balloting to fill the position of Chair-elect. Our Secretary-Treasurer, Terry Manns, is coordinating this effort.

Travel award nomination information for the joint region VI-VII spring meeting in Santa Fe (April 16-18) has been sent to all our members. Lucy Molina, California Institute of Technology is chairing that committee.

Plans are nearly complete for the Santa Fe meeting. Region VII is handling the site arrangements and our region is developing the program. Thanks to Region VII, we will be meeting in the foothills on the magnificent Sangre de Cristo Mountains in New Mexico's highlands. Our meeting site is the Eldorado Hotel, located in heart of downtown Santa Fe.

*(continued on page 19)*

# 2001 NCURA Board...The People and the Mission

by Regina White



Regina White

As I write this, I am preparing for the first meeting of the 2001 NCURA Board of Directors. Our professional organization is extremely fortunate to have such highly talented, richly experienced individuals who are willing to devote their time and energy to furthering NCURA's mission.

Newly elected Board members will join continuing members from the 2000 Board in updating the Strategic Plan, overseeing a wealth of professional development offerings, and in the ongoing effort to settle NCURA into its restructured governance - we made great progress in the past year but there are still a few kinks that need to be worked out! More on that shortly...

First, let me introduce the members of the 2001 Board. This year Region II has elected Jan Anderson, Princeton University, Region III Barbara Gray, College of Charleston, Region VI Paula Burkhart, University of Oregon, and Region VII Brian Farmer, University of Idaho; elected by the national membership this year were Peggy Lowry, Oregon State University and Joyce Freedman, University of California-Berkeley. We have a new Officer this year in Bonny Boice, Research Foundation of SUNY, our Treasurer, and the Board has appointed three members recommended by this President: Ann Hammersla, Massachusetts Institute of Technology, Merrily Sterns, American Museum of Natural History and Tom Wilson, Baylor College of Medicine. These new members of the NCURA Board will join those who are continuing their terms: Bill Corbett, Dana-Farber Cancer Institute, elected from Region I, Jamie Caldwell, Loyola University of Chicago, from Region IV, and Kathleen Harris, Texas Tech University, from Region V; and nationally elected Dick Keogh, Rhode Island College and Tommy Coggins; University of South Carolina, Nancy Wilkinson, making the transition from President to Immediate Past President, Pamela Webb, Northwestern University, in the second year of her term as Secretary and John Case, University of North Carolina, trading in his Treasurer's calculator for the Vice President's chair. A critical element of

continuity, and a personal commitment to NCURA's mission, is provided during each Board year by Kathleen Larmett, our Executive Director.

The interesting thing that will happen when this Board comes together from all over the country and from a variety of institutions, professional interests and expertise, is that each member will be working for, and representing the interests of, the whole of NCURA.

The content and effective delivery of NCURA's professional development offerings will be our primary focus this year, starting with a comprehensive evaluation of what we are presenting, and how well we are meeting the needs of NCURA members and of the research administration profession. We will also review association best practices for Boards, and learn how we can best serve our membership.

Oh, and about those kinks.....there are still a few rough spots in the transition of outgoing/incoming Officers, Board and Committees, as is to be expected in the kind of reorganization we have just accomplished. The 2001 Board will be taking a look at how to ensure a smooth transition each year, so the work of the Board and the Committees can continue without interruption. It is imperative that projects begun in one year can transition to the next in a relatively seamless fashion.

I am looking forward to seeing many of you as I travel to our regional meetings this spring, and hope to hear about what parts of NCURA "work" for you and what new programs you'd like to see. The Board is working for *you* and we need your input to continue making NCURA your primary source of information and professional development.

*Regina H. White is the President of NCURA and serves as the Director, Office of Sponsored Programs for the University of Vermont.*

## NCURA's Professional Development Committee: Planning for the Future

By F. John Case, John Carfora, Marc Schiffman

The Professional Development Committee (PDC) helps set the agenda for professional development programming and publications for NCURA. This includes recommending new topical conferences, managing the evaluation process for ongoing programming, recommending faculty for the "Fundamentals" workshops, overseeing NCURA's publications and evaluating new educational tools and methods for delivering professional programs that will benefit NCURA members.

As the Committee looks forward, the PDC will continue to look at the quality of NCURA programs, evaluation methodologies, and assessment of professional development programming that the membership finds timely, useful and of the highest professional quality. PDC will continue to review the concept of a *Library Bibliography*, which is a comprehensive index of articles and other publications related to research administration that will be available on-line to read or download. PDC is considering additional sessions of Fundamentals, and will continue to recommend Fundamentals faculty, as well as suggest topics and faculty for future videoconferences. Likewise, PDC is assessing the demand for on-line courses and education/training modules for NCURA members.

Last year some of the Committee's accomplishments included establishing a sub-committee to look at the evaluations of NCURA

programs and recommending an "Author's Recognition Program" for members who write publications for NCURA. In addition to many other issues, the Committee also put forward to the then Vice President/President-Elect, Regina White, possible topics for the 2002 videoconferences (in accordance with new governance changes, the PDC is chaired by the NCURA Vice President).

This year PDC used NCURA's new "Call for Volunteers" program for soliciting new members. The process was a big success, with the four new members on the Committee selected from the pool of candidates who put their names forward. The 2001 PDC members include: F. John Case, NCURA Vice President/President Elect (Chair), University of North Carolina at Chapel Hill; John Carfora (Vice-Chair), Dartmouth College; Brenda Sanders Dede, Clarion University of Pennsylvania; Celia Gravely, University of Florida; Bob Killoren (Ex-Officio), Penn State University; Kris Rhodes, University of Kentucky; Myrta Stager, University of Texas Medical Branch at Galveston; Pam Whitlock, University of North Carolina at Wilmington and Marc Schiffman, NCURA National Office.

If any NCURA member would like to provide the committee with ideas or thoughts on professional development, please feel free to contact one of the committee members above. We are looking forward to a very successful year.

*F. John Case is NCURA's Vice President/President-elect, and serves as the Executive Director Office of Contracts and Grants, University of North Carolina at Chapel Hill; John Carfora is the Associate Director, Office of Grants & Contracts, Dartmouth College and Marc Schiffman is the Meetings Manager for NCURA.*



# Letter FROM THE EDITORS

*Your Evolving Interactive Newsletter:  
Feedback Required*

*by Gunta Lidars and Richard Keogh*

As we enter the second half of our terms of duty as your Newsletter co-editors, it seems wise to pause a moment to take stock of the NCURA Newsletter's recent past and ponder its immediate future. One of our goals over the past few months has been creation of a truly interactive newsletter - one more open to your comments, suggestions, and reactions. A few members have taken us up on this invitation. Recent issues have featured commentary and articles that fit the "Letters to the Editor" and "Op Ed" columns adopted by the news media generally. Among these are thoughtful pieces written by Tim Atkinson (<http://www.ncura.edu/orginfo/newssept927.pdf>), Tony Merritt (<http://www.ncura.edu/newsroom/newsjan8.pdf>), and Janet Carr (<http://www.ncura.edu/orginfo/newletters/newsjuly.pdf>). This issue contains a pointed and, we think, most entertaining "Op Ed" article from Steve Smartt of Vanderbilt.

We want to encourage more of these submissions by initiating a formal Letters to the Editor column to accompany our already established "Op Ed" addition. So, if you have a reaction to anything reported here or, for that matter, anywhere else of potential interest to your colleagues, please tap away on your keyboard and forward your thoughts - extensive or brief - to [editors@NCURA.edu](mailto:editors@NCURA.edu).

In a further attempt to promote a more interactive Newsletter, we inaugurate "Milestones" in this issue - a new column featuring news about the professional "happenings" of you and your colleagues within the broad context of research administration. As our numbers grow, it becomes increasingly difficult to keep track of employment changes, promotions, retirements, honors, and other noteworthy events affecting our membership. Our inaugural Milestones column notes the pending retirements of two highly memorable NCURA Past Presidents. We think you want to know about such milestones and urge you to drop us a line informing us of any noteworthy "happenings" of a professional nature affecting either yourself or a colleague. We think others will want to know too. Again, simply "click" off an e-mail to [editors@NCURA.edu](mailto:editors@NCURA.edu).

The past year has brought other changes to the Newsletter, most notably its publication in both electronic and traditional hard copy formats. Electronic publication offers advantages and disadvantages

simultaneously. Foremost among the former is its lower cost. Last year's cost of producing and mailing hard copy of the newsletter was approximately \$7,000 per copy, or about \$45,000 overall. Projected costs of publishing and transmitting the Newsletter exclusively in electronic format are only a few hundred dollars, given that most of the underlying electronic support costs also are required for many other NCURA functions. Some argue such savings could help counteract forces contributing to rising organizational operating costs. Lower costs of electronic publishing also permit production of an expanded number of news articles within the Newsletter - a significant advantage to an organization whose member interests are becoming increasingly specialized and diverse. This expansion potential is augmented further by the comparative ease in which other articles, indeed whole web sites, can be incorporated into electronic text through hyperlinking. Over the past year, we have encouraged inclusion of hyperlinks in Newsletter articles and almost all authors have responded enthusiastically. Electronic publishing also makes possible customization of Newsletters. Eventually you may be able to visit the virtual NCURA Newsroom and create a profile specifying the kinds of articles you want delivered to your electronic mailbox on a programmed schedule.

Nevertheless, current electronic publishing is not without disadvantages. Among those most frequently mentioned is the reduced readability that stems from the need to scroll text through the restricted window of a limited viewing screen. It admittedly also is difficult to take your Newsletter to lunch, a favorite habit of many of our dedicated readers. Hard copy is far preferable for this practice! Yet it is possible to print the entire Newsletter on a suitable printer, which many of us have in our offices. In fact, if you have not tried to produce an office printed copy, try it now by generating a PDF version of the current issue here (<http://www.ncura.edu/newsroom/newsmarch2001.pdf>) and transmitting it to your printer. Is the copy good enough to satisfy your needs? Is the lower cost of producing a greater diversity of articles sufficient for you to endorse the concept of abandoning mailing hard copy of the Newsletter from the National Office? Would you be as likely to read articles if they were transmitted exclusively in electronic format?

Because your opinion on these and other related questions is vital to the publishing decisions of your organization, we will poll members' views on these and other related questions this spring. When the polling document arrives in your electronic mailbox, please take a few minutes to read the questions and let us know how you feel. Your feedback can help NCURA use evolving technology wisely to continue to provide relevant news when, where, and how you want it.

*Gunta Lidars is the Director, Office of Research and Project Administration at the University of Rochester and Dick Keogh is the Director, Office of Research and Grants Administration at Rhode Island College.*

## MILESTONES

**Allen J. Sinisgalli**, Princeton University, will retire as Director of the Office of Research and Project Administration effective June 30, 2001. Al will remain as Associate Provost for an undetermined timeperiod to complete special projects. Al has been the director of ORPA since 1975 and has been extremely active in NCURA for more than 27 years, serving in numerous capacities, including Vice-President, and President from 1986-87. All of his friends and colleagues wish him the best, and offer their sincere gratitude for his many years of service to NCURA and the research administration profession.

**Mary Husemoller**, University of Nevada - Reno, will retire as Director of Sponsored Projects Administration effective April 30, 2001. Mary has been the Director since 1993. Prior to this, Mary was the Director of the Office of Grants and Contracts at New Mexico State University. Mary has been very involved in NCURA for over 20 years, and also served as Vice-President, and President from 1997-1998. Mary and her husband will enjoy their retirement in their new home in Durango, CO where Mary plans to spend her time on numerous hobbies, including gourmet cooking. Mary's dedication to NCURA is very much appreciated. We will miss her friendly smile and her gracious manner. But we will be out to visit!!!

*farewell*

# Human Subjects in Research - Recent Events

by Suzanne Palmer

Whether your holiday reading included, John Le Carre's the *Constant Gardener*, Patrick Tierney's *Darkness in El Dorado* or the latest news story on the AIDS epidemic in the underdeveloped world, the current furor surrounding human subjects in research was hard to escape. The widespread public interest was brought home to me when a cab driver in Salt Lake City on hearing that I was involved in research administration engaged me a conversation on the ethics of gene therapy. As research administrators we are often called upon by friends and family to comment on and explain the background of the news stories. Yet keeping up with this fast moving area is a challenge, even for those who have this as their primary responsibility. This article is therefore intended to provide not only information current at the time I am writing it, but also to provide you with some web resources to assist you in following events.

## OHRP

The newly established Office of Human Research Protections (OHRP) came into existence as a result of public concern about the current state of the system for protecting human volunteers in research studies. These concerns were raised in several reports by the Department of Health and Human Services Inspector General to Congress, (<http://www.hhs.gov/progorg/oei/reportindex.html>) as well as in the reports of the National Bioethics Advisory Commission ([http://bioethics.gov/cgi-bin/bioeth\\_counter.pl](http://bioethics.gov/cgi-bin/bioeth_counter.pl)). In addition, press coverage surrounding the closure of research programs at several major research universities by OPRR made sensational news across the nation. While the press most often focused on drug and device trials, the federal reports touched on every aspect of the human subject protection system, from adequacy of the current institutional committee structure, including workload and institutional support of the committees, to the involvement of the pharmaceutical industry in clinical trials and the testing of new drugs in underdeveloped countries. Dr. Greg Koski, the director of OHRP, in testimony before the VA subcommittee described specific initiatives which he intended to pursue. These included: 1) simplifying the assurance process, 2) establishing independent accreditation of programs and certification of IRB professionals and 3) developing objective criteria for measuring the effectiveness of the system for protection of human subjects in research. He has moved swiftly toward implementing these goals.

## Communications

Prominently displayed on the OHRP web site is the motto "Doing it right together" (<http://ohrp.osophs.dhhs.gov/index.htm>). In support of this notion and understanding that communication is an important part of "doing...it together," OHRP has established a listserv; instructions on how to sign up can be found on the OHRP web site. The list is not restricted to IRB personnel.

## New Assurance Process

OHRP has instituted a new assurance process replacing Multiple and Single Project Assurances with a Federal Wide Assurance (FWA) (<http://ohrp.osophs.dhhs.gov/irbasur.htm>). The process is designed to eliminate some of the lengthy and contentious negotiations that were routine in the assurance process in the past. Two changes you should be especially aware of are the requirement for *all institutions*, even those who use the Institutional Review Board (IRB) of another institution, to have their own assurance and the educational requirements for institutional officials. IRB chairs, administrators, and institutional officials must sign on to the OHRP education website and take the tutorial available there. FWAs will not be provided unless this educational requirement has been satisfied.

## Evaluation of the System – IOM Study

In an effort to assess the entire system for the Protection of Human Research Subjects as well as to introduce "greater uniformity and public accountability in the review and approval process" OHRP, DHHS and the Greenwall Foundation are sponsoring a study by the Institute of Medicine (IOM) of the National Academy of Sciences (<http://www.iom.edu/IOM/IOMHome.nsf/Pages/human+research+protections>). This study will address three interrelated topics:

- 1) Accreditation Standards for IRBs,
- 2) the overall structure and functioning of human subject protection activities, including but not restricted to IRBs and
- 3) criteria for evaluating the performance of human subject protection activities.

Phase one is a 6 month fast-track study on accreditation standards for IRBs. The IOM held a public meeting on Jan 22 to hear comments on voluntary accreditation as a mechanism to improve the protection of human research subjects in general and specifically on the draft standards published by Public Responsibility In Medicine and Research (PRIM&R). PRIM&R is a non-

profit organization focused on advancing ethical precepts in medicine and research; it has a web site at [www.primr.org](http://www.primr.org). It is important to note here that these are not the only standards being developed. The National Committee for Quality Assurance (NCQA; [www.NCQA.org](http://www.NCQA.org)), a private non-profit organization which evaluates and reports on the quality of managed care organizations, and Medical Care Management Corporation (MCMC), an organization which provides panels of clinical researchers to evaluate the appropriateness of experimental treatments and to review research protocols, in collaboration with the Veterans Administration are developing accreditation standards for human investigation at VA hospitals and research centers. While not yet published in draft form, their slide presentation is available on the IOM website.

A wide range of opinions were expressed at the meeting. Accreditation is viewed by some as the best means of assuring the public of some minimal standard of quality in the review and conduct of clinical research. Others were concerned that the accreditation process itself would divert scarce resources better used on the actual functioning of the IRB. It was pointed out that the draft PRIM&R standards focus almost entirely on clinical research and would require modification in order to make sense in the context of institutions primarily reviewing behavioral and social science research. Speakers also suggested that while accreditation may be the best route to reassure the public of the integrity of this process, the development of a set of evaluation criteria and best practices should be completed before standards are set. A report on this first phase of the project is expected in April 2001.

## ADVISORY COMMITTEE:

In addition to creating the OHRP, Secretary Shalala also established an outside advisory panel for the office. The committee, the National Human Research Protections Advisory Committee (NHRPAC), composed of a group of 17 non-governmental scientists, ethicists and patient advocates, held its first meeting on December 20 and 21, 2000. Transcripts of the meetings as well as other documents of interest are posted on the committee's website. (<http://ohrp.osophs.dhhs.gov/nhrpac/nhrpac.htm>). The membership of the committee aroused considerable criticism from social and behavioral scientists as well as from IRB members who review social and

behavioral projects, due to what was viewed as lack of sufficient representation from these fields. Perhaps because of this criticism, the very first item of business at the first meeting of the advisory committee was a presentation dealing with the concerns of this group of researchers (a copy is available at <http://www.aaup.org/IRBdoc.htm>). The NHRPAC asked for additional information before making recommendations in this area.

### CONFLICT OF INTEREST

Last August, HHS sponsored a two day meeting at which concerns of the various communities involved in clinical trials, (i.e., investigators, patients, institutions, and pharmaceutical companies were presented). The document resulting from that meeting *Financial Relationships in Clinical Research* <http://ohrp.osophs.dhhs.gov/nhrpac/mtg12-00/finguid.htm> was presented to the NHRPC for discussion and approval. Of note in the document is the call for disclosure and review during the IRB process, not only of the investigators financial interests, but also of institutional financial arrangements with the sponsor (e.g., holding of an equity interest, or holding patent rights in the product to be tested). The document calls for consideration of disclosure to subjects of any conflicts, even those which the institutional conflict of interest committee and the IRB consider managed.

### SOCIAL SCIENCE AND THE PROTECTION OF HUMAN SUBJECTS

Dissatisfaction on the part of social and behavioral scientists with the application of the federal regulations on protection of human subjects (45 CFR 46) to their research is not new. Indeed IRBs have long struggled to fit the square peg of social science research into the round hole of these regulations, sometimes called "the common rule". Social scientists point out that rules developed for risky drug and device trials don't make sense in the context of their work. In the past IRBs were comfortable exercising some discretion in interpreting the rules when reviewing this research. However, the actions of OPRR/OHRP in the last two years have forced committees to abide strictly by the letter of the law rather than its spirit. For example OPRR/OHRP has ruled, in at least one case, that before a participant may be asked to provide information about other family members the investigator must get informed consent from the other family members. They note that a physician engaged in research would not be required to obtain such consent to ask about family members' medical conditions. Indeed, a physician who did not request such information might be seen as negligent. Anthropologists frequently cite the requirement for individually signed informed consent in ethnology research as culturally insensitive. Social and behavioral scientists, in general, agree that some of their research is covered by the common rule, but they point to the need for flexibility in the review. New initiatives in international clinical research are likely to exacerbate these problems.

### INTERNATIONAL RESEARCH

Recent articles in the Washington Post and the New York Times have called attention to ethical problems surrounding the conduct of clinical trials in the underdeveloped world by scientists from first world institutions and companies. In addition, in January the National Bioethics Advisory Commission held a meeting on their report on international clinical research. Concerns center on the use of patients who have no other source of medicine, or medical care, the use of placebos, as well as the need for continued access to proven new therapies in host countries. Similar concerns led to a recent amendment of the Declaration of Helsinki ([http://www.wma.net/e/policy/17-c\\_e.html](http://www.wma.net/e/policy/17-c_e.html) [or see the NHRPAC website for a side by side comparison of the 1996 and the 2000 policies]). The Director of OHRP is said to be interested in setting up an Office of International Activities, which will focus on clinical studies.

There is no doubt that a lack of public confidence in the system for protection of human subjects in research cannot be ignored by the regulatory agencies in the US and abroad. Given the current level of public criticism, an increase in regulatory activity is not unlikely. I urge you to keep up with developments in this field and carefully review and thoughtfully comment on new proposals.

*Suzanne Polmer is the Director, Grant & Contract Administration at Yale University.*

### ERA VI "Stop Talking... Start Doing" (continued from cover)

We are excited about the new format for ERA VI and want to share these topics with you! So watch for the preliminary program which will be out shortly and we will see you in Portland!

*Nancy Wray is as the Senior Associate Director, Office of Grants and Contracts at Dartmouth College, and Ron Splittgerber is the Director, Research Services at Colorado State University*

### Use of Vendor/Institutional Developed Software to be Highlighted at ERA VI

The ERA VI program promises substantial opportunities for attendees to interact meaningfully with users of vendor or institutionally produced ERA software "solutions". The Program Committee currently is drafting a letter to these producers requesting identification of institutional users who are making productive use of their software applications. The Committee also extends an open invitation to institutional users of ERA products to demonstrate or discuss how the products currently are being used to improve productivity in their home institutions. Institutional users also will be free to discuss their plans for future use of one or more ERA software applications. Presenters must be users of ERA software within their home institutions and cannot be representatives of vendor/institution ERA software developers.

Use of vendor/institutional developed software will be presented through one of two venues at ERA VI. Some presenters may opt to create a poster display, which will be available for viewing throughout the conference. Creators of poster displays will be asked to be in attendance at their displays and one or more specified times during the conference to talk with interested attendees. The schedule of times representatives will be available at their displays will be listed in attendee registration packets.

The Program Committee also expects to ask some institutional users to participate in roundtable discussions, which likely will be grouped by application process (e.g., compliance, postaward accounting, proposal tracking, routing and approval systems, intellectual property, etc.). These moderated discussion sessions will be open to all attendees who will be able to inquire about how specific vendor or institutionally developed software applications are being used in different institutional settings. Individuals interested in presenting a poster display or participating as an institutional software user at a roundtable discussion are cordially invited to contact either Ron Splittgerber at Colorado State University ([ron.splittgerber@research.colostate.edu](mailto:ron.splittgerber@research.colostate.edu)) or Dick Keogh at Rhode Island College ([rkeogh@ric.edu](mailto:rkeogh@ric.edu)).

# Standards, Standards, Standards

by Stephen D. Dowdy

I can't say it enough times. Standards, standards, standards. The wheels are in motion. Your life as research administrators will be (or already is) changing rapidly in the face of technology. Many of you are looking for that perfect eRA solution for your institution. These solutions will be guided by standards. Luckily, there are many committees working on the development of standards.

The Inter-Agency Electronic Grants Committee (IAEGC) works with the federal agencies to develop electronic grants systems and standardize electronic commerce throughout the federal government. The IAEGC is working closely with the Grants Management Committee to achieve the mandates of Public Law 106-107, the "Federal Financial Assistance Management Improvement Act of 1999", which was enacted on November 20, 1999. Its mission includes:

- the electronic exchange of federal grants information,
- developing, promoting, coordinating, and maintaining the use of standard data through a coordinated effort with other federal agencies, federal inter-agency organizations, and federal grant recipients, and
- conducting outreach to the trading partner community to encourage its participation in electronic grants.

The trading partner community referred to above is you, the university community.

The IAEGC works with the participating agencies, with various inter-agency groups (such as the FDP, the CFO council, and the CIO council,) and with the entire grant recipient community. The IAEGC meets on a quarterly basis and members of the eRA committee of the FDP routinely attend this meeting. Because of the complexities associated with federal financial assistance programs (remember, assistance awards include Medicare, block grants to States, student financial aide, road construction projects, etc.), two focused subcommittees were formed: State and Local Governments, Non-Profit, and Other (S&L/NP&O); and the Research and Related (R&R). The university's voice is heard through the R&R subcommittee of the IAEGC.

The R&R subcommittee meets more regularly, approximately once a month, than the full IAEGC committee. Again, members of the eRA committee regularly attend this meeting. It should be noted here, however, that the university community does not have formal membership in any of these groups. But, since the major grant making agencies are members of the FDP, the university's voice is heard through the attendance of the eRA

committee of the FDP. The R&R subcommittee has an open door policy to the FDP membership and encourages us to use the R&R subcommittee to express the concerns of the universities.

One of the most notable outcomes of the R&R committee was the creation and subsequent adoption of the Electronic Data Interchange (EDI) transaction set 194. This transaction set is the standard for transmitting proposal information to the recipient agency. Additionally, the R&R has developed an implementation convention (IC) to use the existing EDI transaction set 850 to transmit award information back to the university. Both the 194 and the 850 transaction sets are approved by the American National Standards Institute (ANSI). They are the standard.

In the past, the university community, in conjunction with the R&R subcommittee and the Logistics Management Institute (LMI), has had to piggy-back its requests for standards with other organizations. The university community has recently been recognized as its own industry. With this recognition, the Federal Grants Functional Working Group (FGFWG) has been formed to give the research community the same level of authority to control its own destiny as has been given to the logistic and procurement communities in the past.

Previously, the efforts of the R&R subcommittee have had to be funneled through other groups. When we wanted to change a data element within the 194 transaction set, we had to submit our request through one of the other functional working groups. We now can use the R&R committee to work out the details on modifications to the standards and submit the request to the FGFWG. As currently envisioned, many of the FGFWG members are part of the R&R subcommittee. Therefore, approval of proposed changes should be able to move into the acceptance stage without a long period of comment and review.

Interestingly, NSF is the only agency that is able to accept the 194 transaction set. In case you haven't noticed it, look on the NSF Fastlane page and you will see an option for EDI submission. This really works! However, in NSF's current implementation, several budget categories require hard-coded descriptors for NSF to interpret the data being transmitted correctly. For example, as currently defined, the 194 transaction set has only one budget category to define personnel costs, namely Labor. NSF, on the other hand, requires a finer level of detail for transmitting labor costs: senior personal, post-docs, graduate students, other professional, etc. Hence, NSF was forced to require hard-coded descriptors within the budget segment of the 194 transaction set to get the data they require. The problem



with this is that it is NSF specific and would not work for a different agency. A different program would be required to transmit the same proposal to another federal agency. This is not one-face to the government. While we may have a standard, it will do us no good if every agency interprets the standard differently and requires hard-coded descriptions to obtain the data they desire.

Therefore at a recent R&R subcommittee meeting, I recommended adding additional coded descriptors to the budget categories of the 194 transaction set to satisfy NSF's needs. For other federal agencies that don't require this level of detail, they can simply add the categories together. For the university community, we would have one set of codes for transmitting the labor portion of a proposal budget. This helps us achieve the one-face to the government, which continues to allude us.

There are other projects underway and/or near completion and implementation. These include:

1. Electronic Notification of Awards - Design a standard electronic data set to transmit award information.
2. Professional Profiles - Design an electronic data set for static professional data.
3. Institutional Profiles - Design an electronic data set for static institutional information.
4. Electronic Routing and Approval Systems - Investigate, design, test and distribute alternative solutions for routing and approval systems.
5. Integrated Performance Standards - Identify opportunities to standardize and simplify business rules and performance standards associated with Federal Research Assistance.

These data sets are then sent for subsequent ratification and approval via the committee structures described in this article. Now that we are in control of our own destiny, we can develop and modify our standards. I encourage you to begin to familiarize yourself with these emerging standards and take the opportunity to comment on them.

Your institution will likely embark on eRA at some point in time. Whether you choose EDI, HTML, XML or another technology, eRA can not exist without standards. Our voice can and is being heard. Is yours?

*Steve Dowdy is the Assistant Director for Network & Information Services at the Massachusetts Institute of Technology.*

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# 2000-2001

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Is your university developing a comprehensive compliance program and you need a "kick start" to get organized? Would you like to learn more about the elements of financial compliance? Are you involved in developing a roles and responsibility document for your area or institution? Perhaps you would like to know more information about the special compliance programs required by the Department of Justice and agency Inspector Generals subsequent to civil fraud cases or the NIH proactive site visits.

If these areas are of interest, please join NCURA for this teleconference on May 15, 2001 11:30 am to 3:30 pm. If you haven't already registered you can do so online at the NCURA website or you can call the NCURA office at 202-466-3894.

Jerry Fife, Director of Grant and Contract Accounting at Vanderbilt University will moderate a panel that includes, Elizabeth Mora, Director of Sponsored Research Operations at Harvard University; Frank Zuraf, Vice President, Internal Audit at the Research Foundation of SUNY and Barbara Walsh, Manager, PricewaterhouseCoopers.

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# NCURA 2001 Calendar of Education and Events

## March 21, 2001

Live Video Satellite Conference, Part III of the 2000-2001 Subscription Series Divergent Views and Issues When Contracting with Industry

## April 2-4, 2001

Fundamentals of Sponsored Project Administration Workshop  
Boston, MA

## April 16-18, 2001

Regions VI & VII Joint Spring Meeting  
Santa Fe, NM

## April 28-May 1, 2001

Region IV Spring Meeting  
Minneapolis, MN

## April 29-May 1, 2001

Region II Spring Meeting  
Hershey, PA

## April 29-May 1, 2001

Region I Spring Meeting  
Burlington, VT

## April 29-May 2, 2001

Region V Spring Meeting  
Oklahoma City, Oklahoma

## May 5-9, 2001

Region III Spring Meeting  
Ft. Lauderdale, FL

## May 15, 2001

Live Video Satellite Conference, Part IV of the 2000-2001 Subscription Series Compliance Issues Impacting Financial Research Administration

## June 18-20, 2001

Fundamentals of Sponsored Project Administration Workshop  
St. Louis, MO

## August 16-18, 2001

ERA VI Conference  
Portland, OR

## August 22-24

Fundamentals of Sponsored Project Administration Workshop  
Portland, OR

## November 11, 2001

Workshop 2001  
Washington, DC

## November 12-14, 2001

43rd Annual Meeting  
Washington, DC

### NEWSLETTER DEADLINES

#### April/May 2001 Issue

Submission of Articles: April 6, 2001

Space Reservation for Ads: April 6, 2001

Submission of Display Ads: April 13, 2001

## Regional Corner (continued from page 9)

The program developed by our planning committee has six workshops, as well as two dozen concurrent sessions and special focus topics. We have planned the program to include sessions of interest to everyone in research administration. There will be sessions on pre- and post-award issues; compliance; financial management; departmental administration; professional development; intellectual property and ERA.

Both the site and the program are not to be missed. Mark your calendar and plan to attend!

*Terry Manns is Region VI Secretary-Treasurer and Director, Research and Sponsored Projects, California State University, Sacramento.*

## REGION VII Rocky Mountain

While vote-counting jokes abound across the nation, our recent election was without glitches and the long-awaited results are in: On behalf of the region, let me congratulate our new chair, Judy Fredenberg, University of Montana; member-at-large Winnie Ennenga, Northern Arizona University and; regional

representative, Brian Farmer, University of Idaho. With treasurer, Josie Jimenez, New Mexico State, and second member-at-large, Denise Wallen, University of New Mexico, these individuals comprise the region's executive committee and will serve us well in the year ahead. Congratulations to our new officers!

Make plans now to attend the Region VI/VII combined spring meeting April 16-18, 2001, in beautiful Santa Fe, New Mexico. The program committee has been working tirelessly and is now tweaking the final program which is linked from both regional web pages ([http://www.ogrd.wsu.edu/r6ncura/region\\_meetings.html](http://www.ogrd.wsu.edu/r6ncura/region_meetings.html)). There will be several half-day workshops and a full slate of concurrent sessions, all geared to meet the professional development needs of a wide variety of research administrators from new-comers to old-timers (self-categorization required!).

Sessions include: An Analysis of Industrial Relationships: The Good, the Bad, and the Ugly; Career Moves: Changing Positions, Changing Institutions, Even Changing Coasts; and, Leadership in a Time of Change.

We look forward to seeing you in sunny Santa Fe!

*Carey Conover is the Associate Director for Special Projects Office of the Vice Provost for Research & Graduate Studies at Northern Arizona University.*

The National Council of University Research Administrators (NCURA), founded in 1959, is an organization of individuals with professional interest in problems and policies relating to the administration of research, education and training activities at colleges and universities.

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# *p Ed* (Leap of) Faith-Based Organizations

by Steven Smartt

I was skeptical, at least initially, upon hearing that President Bush wants to channel federal dollars to faith-based organizations (FBOs) to address social ills. Beyond the thorny constitutional issues lie practical questions of whether the FBOs can comply with government management standards. Partnering with the federal government is much more than simply accepting dollars. It usually involves accepting a high degree of federal oversight, as well.

In my professional career as a university research officer, I help my campus compete for federal funding, as well as comply with regulations that accompany those funds. I have gained a keen respect for the stewardship and public trust associated with use of taxpayers' dollars. But this trust is not based on a handshake and a promise to be well behaved. The government, understandably, has a myriad of rules and regulations that must be carefully and consistently obeyed to demonstrate accountability.

Stewardship means one thing to most ministers and the average member of a congregation. It has an entirely different meaning to Uncle Sam.

As one type of non-profit organization, colleges and universities have a long and distinguished partnership with the federal government. Since the mid-1940s, when university scientists helped develop atomic energy for military and civilian applications,

the government has supported university-based researchers in many fields of science and engineering.

It's been a productive partnership and a good investment. The social and economic benefits have far exceeded the cost.

As part of this deal, however, the oversight and accountability measures have reached far into the academic infrastructure. Not just into accounting practices and monitoring of labor hours, but also oversight of matching funds, purchasing systems, property inventories, facilities use, and access to data.

The unfortunate byproduct of this kind of oversight is that it tends to pay too much attention to accounting and too little to outcomes.

It's only natural for the government to focus on business transactions rather than on programmatic performance. It's also a longstanding tradition. When Lewis and Clark returned from their historic trek to open the western frontier of our growing nation, a persistent auditor at the War Department questioned the lack of a receipt for some articles that were traded with the Native American tribal chiefs whom Lewis and Clark encountered along the way. I think the results of their expedition far outweighed any lost receipts.

FBOs should not be so willing to tap into public funds without first weighing the loss

of independence that may result. A swat team of auditors swarming around a church office looking for a shoe box of records would not be a pretty sight.

I'll defer to others to wrestle with the constitutional issues of church and state separation, and I recognize that policy makers and bureaucrats are working to find a way to make this new hybrid work. In fact, I hope they explore a different kind of frontier and produce an entirely fresh model for government oversight.

I believe that results and outcomes, and honest efforts for trying, should count for something. Perhaps even more than bookkeeping. Public funding of FBOs may give us our best chance to test the idea that accountability can be proved by looking at performance and outcomes - such as sheltering the homeless, rehabilitating inmates, and mending broken lives - instead of looking at business practices. For that, I would be willing for the Bush Administration to take a flying leap of faith.

*Steven Smartt is a Past President of NCURA and the Director of Sponsored Research at Vanderbilt University.*

*Note: The information contained in the editorial section reflects the opinions of the contributor and not necessarily that of the editors or NCURA.*

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