



Office of the Chair
Telephone: (510) 987-9303
Fax: (510) 763-0309
Email: clifford.brunk@ucop.edu

Assembly of the Academic Senate, Academic Council
University of California
1111 Franklin Street, 12th Floor
Oakland, California 94607-5200

January 12, 2006

LARRY COLEMAN
VICE PROVOST - RESEARCH

Re: Proposed Policy Changes Related to UC Effort Reporting

Dear Larry:

Several Senate divisions and two Systemwide Senate committees have reviewed the recommended policy changes related to effort reporting that were developed by the UC Effort Reporting System Management Work Group, along with the accompanying proposed language changes to the UC Contract and Grant Manual and the UC Accounting Manual. Responses were received from the Berkeley, Davis, Los Angeles, and Santa Cruz divisions, and from the University Committees on Planning and Budget and on Research Policy. All agree that, in general, the proposed changes set reasonable expectations for how faculty should report the time they spend on federally funded research projects. Specific comments touched on these points:

Personal certification of effort – The proposed change to make Principal Investigators personally responsible for verifying their own effort on federally required documents is sensible and relieves others – e.g., department chairs or PIs of large grants -- from the untenable position of having to certify information about which they may have little actual knowledge. It is hoped this can be done without an undue extra demand on the time of researchers (see faculty productivity comment below). This requirement, however, should be better defined and the consequences of non-compliance (either intentional or unintentional) should be effectively conveyed to faculty.

Faculty productivity and compliance with the reporting system – As the Santa Cruz division response suggests, a primary goal of the policy change should be minimizing the task of effort reporting and its impact on faculty time and productivity and at the same time enhancing compliance. It is assumed that, to help meet that goal, an online tool could be found that allows reports to be filled out and sent electronically, monitors percentages, and sends out email reminders when reports are due.

Effort percentages -- Who on each campus will determine the “allowable” amount of grant-supported effort? Also, it is unclear how additional teaching obligations are to be recognized and added into a 100% formula.

Revisions of reports – The language in this section needs to be clearer as to whether the “facts and circumstance” review now differs from before and as to what such a review actually entails.

Accuracy – It should be explained how the +/- 5% margin will be verified, and (as above) what the consequences of non-compliance are. In addition, the following change is suggested for greater clarity in the language of III.A.1, Preciseness of Certifications:

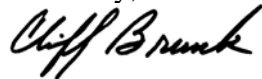
“OMB Circular A-21 provides for “a degree of tolerance” in the preciseness of effort reporting. ~~Effort reports at UC may be completed with a preciseness tolerance of +/- 5%; that is, a~~An individual at UC may thus certify a level of effort for an award or activity that is within five percentage points of their best estimate of the actual effort expended during the reporting period.”

Timeliness – The 30-day certification time line may be too short, given that faculty members may be away from campus for 30 days (or longer) at a time.

Consultation with faculty – Some concern was expressed that the proposed changes were devised without sufficient input from faculty researchers themselves, and we advise that, if possible, more discussion take place at the department level before implementation.

Please forward this letter and the enclosed individual responses to the Effort Reporting System Management Group for their consideration. I understand they are now finalizing proposed policy language, and I hope the Senate’s comments will prove helpful in that process.

Sincerely,



Clifford Brunk,
Academic Council Chair

Copy: Academic Council
Maria Bertero-Barcelo, Academic Senate Executive Director
Ellen Auriti, Executive Director, Research Policy and Legislation
Jorge Ohy, Manager, Costing Policy and Analysis

CB/bgf