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Chair of the Assembly and the Academic Council
Faculty Representative to the Board of Regents
University of California
1111 Franklin Street, 12th Floor
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October 14, 2008

**VICE PRESIDENT STEVE BECKWITH
UNIVERSITY OF CALIFORNIA**

Re: Proposed Changes to UC Effort Reporting Policy

Dear Steve:

Thank you for asking for Academic Senate input on the recommendations of the UC Effort Reporting System Management Work Group regarding proposed changes in UC's effort reporting policy to strengthen enforcement. The UC Contract and Grant Manual and the UC Accounting Manual would be revised to address the consequences of failure to comply with effort reporting requirements.

At its meeting on September 24, 2008, Academic Council discussed the proposed changes. Faculty felt strongly that the underlying causes of non-compliance should be addressed prior to enacting punitive changes in policy. Council members noted that the recommendations do not describe the magnitude of the problem and wondered if a change in policy is necessary. If a significant problem with compliance does exist, it may be the result of difficulties with navigating the computerized reporting system rather than unwillingness to comply. A majority of Council members reported problems using the system because it is dependent on outmoded payroll system technology. For example, the system does not easily deal with the common situation in which a staff person expends less than 100% effort on a single project since they are funded by more than one source. Further, when faculty members encounter problems with the reporting system, it is difficult to obtain immediate technical help. One member suggested that a document offering technical guidance on best practices and frequently asked questions be created.

Council members also expressed concern that faculty are increasingly burdened with regulatory requirements. In recent years, the University has added mandatory reporting on a number of topics (e.g., ethics, sexual harassment). While Council recognizes that effort reporting is required for recipients of federal funding, members feel that the University's policies should strive to facilitate such reporting rather than penalize those who do not comply.

Council members also raised practical concerns with the policy as written. Specifically, members propose that responsibility for enforcement should be with the Extramural Fund Accounting office,

rather than with a department Chair or Dean. A process could be developed in which the EFA notifies the faculty member several times before involving administrators. It also is unclear whether department Chairs or Deans would be effective in such a role.

In summary, Council identified a number of concerns with the proposed policy, including the locus of enforcement, increasing regulatory burdens on faculty, a lack of technical support, and particularly poor design of the automated system.

Council intends that this letter open a dialogue between the faculty, the Effort Reporting System Management Work Group, the Office of Research and Graduate Studies, and the IT groups that could help resolve obstacles to compliance. Council requests that no changes to the policy be made prior to holding such discussions.

Please do not hesitate to contact me if you have any questions regarding Council's concerns.

Sincerely,

A handwritten signature in cursive script that reads "Mary Croughan".

Mary Croughan, Chair
Academic Council

Copy: Academic Council
Martha Winnacker, Senate Director
Vice President Anne Broome
Jorge Ohy, Financial Management, UCOP
AVC Susan Abeles, UCLA