

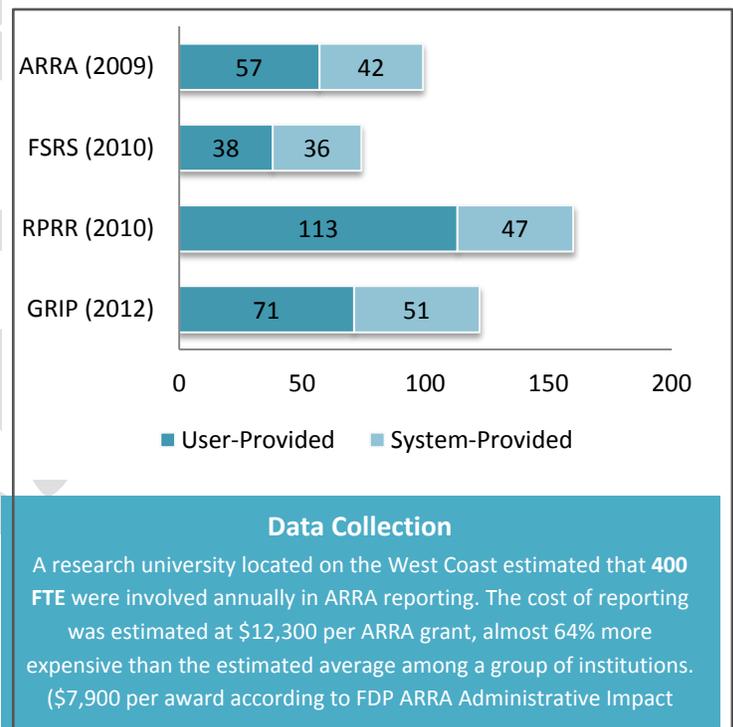
Preparing for the Digital Accountability and Transparency Act

DATA Act: Improving Data Quality, Standardizing Reporting, and Reducing Burden

- Implementation details are unclear as the OMB and Treasury begin preparing to establish common data elements.
- A 2 year pilot will follow to allow OMB/Treasury to test the effectiveness and burden of the new data standards.
- The new law requires the introduction of a system of universal unique identifiers for all federal grants.

DATA Act: Replacing FFATA and Learning From Previous Reporting Efforts

- [FFATA](#) (Federal Funding Accountability Act) passed in 2006. Since October 2010, prime recipients have to report the first tier of subrecipients in [FSRS](#) (FFATA Subaward Reporting System). Most of the elements are prepopulated, but 10 of them are filled in a process that is mostly manual. Recipients modify data elements every time that a new subrecipient invoice is generated.
- [FFR/SF-425](#) consolidated two different forms (SF-269/SF-269A & SF-272/SF-272A). It was introduced by OMB in July 2009. New data elements are requested (Total Recipient Share Required). Recipients report quarterly, semi-annually, and annually according to federal agency requirements.
- [ARRA](#) (American Recovery and Reimbursement Act), passed in 2009, established **quarterly** reporting on **99 data elements**. Recipients report on awards, subrecipients and vendors. Most of the data was provided by recipients not system-provided. **PIs** had to report on project status quarterly.
- [RPPR](#): (Research Performance Policy Report) is a uniform reporting format that replaces interim and progress reports. Proposed by the Research Business Models subcommittee of the NSF in 2010, RPPR requests info on 160 data elements, including free text entry. The RPPR has been implemented gradually across federal agencies, which specify the type of grants should submit RPPR (e.g. NIH Streamline Non Competing Award (SNAP), Fellowship, etc. See more [here](#)).
- [GRIP](#) (Grant Reporting Information Project), launched by the Recovery Board in 2012, GRIP was a pilot to evaluate the effort of reporting. It was comprised of 122 data elements, including ARRA and SF425 data elements. 75 data elements were provided by recipients.
- [SAM](#) (System for Award Management), set up in July 2012, attempts to incorporate nine different systems, including FSRS and CFDA. Most of the GRIP pre-populated data elements were provided by SAM.
- Distinct from ARRA reporting, [STAR Metrics](#), a partnership between FDP and universities established in May 2010, attempts to measure the impact of ARRA and science spending on job creation, knowledge generation, and health outcomes in grants funded by five federal sponsors. Recipients report on vendor information, job classes, and award amounts.
- [OMB Circular A-133](#) requested higher education institutions submit audits reports since 2007. Public universities



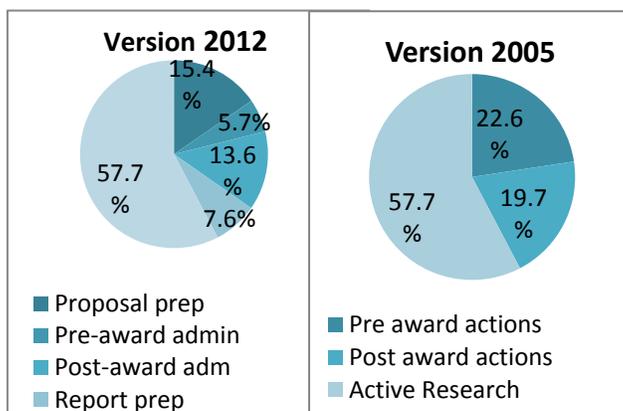
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report expenditures, including subawards and subcontracts, to their respective state to fill the Schedule of Expenditure Federal Awards ([SEFA](#)). Lack of unique identifiers limits cross-checking data.

- **OMB Uniform guidance:** (*external*) on Cost Principles, Audit and Administrative Requirements for Federal Awards will be implemented in December 2014. In preparation for meeting those guidelines, universities have developed working groups based on each of the subparts and appendices.
- **Research.gov, USAspending.gov** and **SEFA:** (*external*) are systems that track federal grants. However, they report on different metrics (e.g. expenditures versus awards). Agency and institution both contribute common data elements to support reporting from these repositories

DATA Act: Estimating the Cost

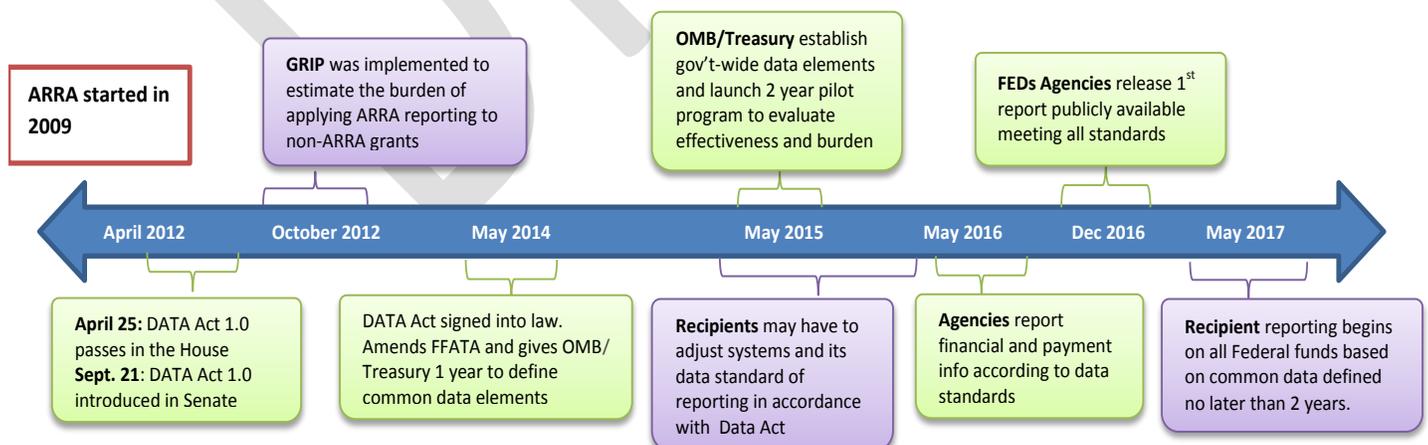
GRAPH 1: FACULTY WORKLOAD SURVEY



- **Reporting Cost:** According to the 2012 [FDP Faculty Workload Survey](#), in order to obtain, complete, and close out federally-funded projects, PIs from a wide group of research universities estimate spending 27% of their research time in research administration tasks and report preparation. It seems there has been no reduction in administrative burden since 2005 (*See graph*).

- With few details available, it is difficult to estimate the potential cost incurred by the DATA Act. However, if increased data quality and transparency are the goal, then we should prepare for requirements along the lines of previous efforts.

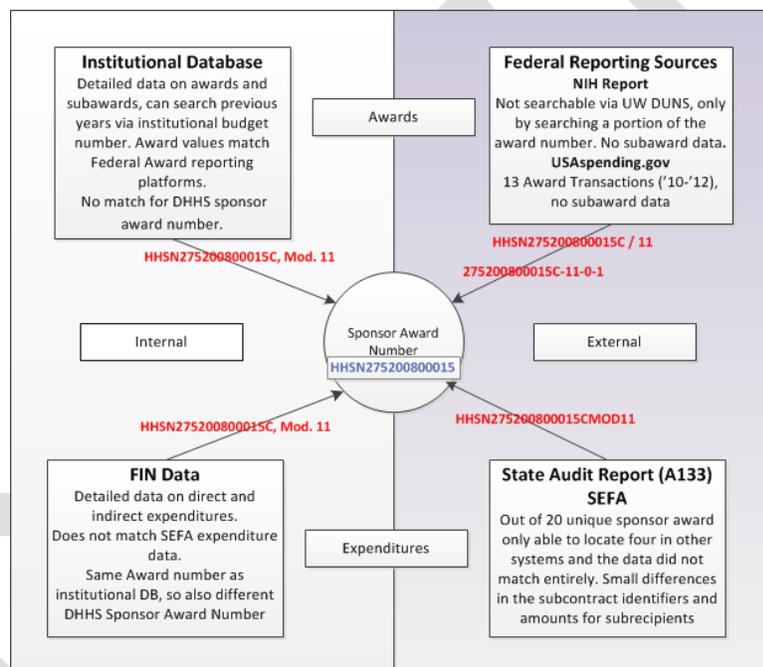
Timeline



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Challenges Ahead: Awards vs. Expenditures, Award Identifiers, DUNS

- There is a real need for agreement on common data elements to increase data quality and utility.
- Common names and definitions for data elements
 - Data elements regarding award, funding agency and subawards are common among FRS, ARRA and GRIP reports. However, a set of similar data elements have different names and definitions. (i.e. Agency Funding Name is called Awarding Agency Name as well as Federal Agency Name).
- Awards or Expenditures? Apples and Oranges
 - There is need for agreement on reporting award amounts or expenditures since the two are not comparable.
- Importance of Unique Identifiers
 - We are currently unable to reconcile internal and external award data due to a lack of common award numbers in different systems.
 - DUNS numbers are unique IDs for each physical location of a business who receives federal contracts or grants. DUNS aren't effective entity IDs and one entity can have multiple DUNS in one system.



Conclusions

- Duplicative reporting and data inconsistencies incur unnecessary burden on award recipients. Common data elements are needed in order to harmonize disparate agency systems and requirements to reduce burden.
- ARRA, GRIP, and STAR reporting demonstrated our ability to leverage data to answer questions about the impact of spending, but at the cost of compounding effort. It is important that DATA Act implementation replaces and does not just build upon current reporting burden.
- Universal unique identifiers are a key component of DATA Act implementation in order to improve data quality across systems.