

NSB Examines Regulatory Burden on PIs

The National Science Board (NSB), the National Science Foundation's (NSF) policy and advisory board, has issued a request for information (RFI) for principal investigators with Federally funded research activity to identify those Federal policies and institutional requirements that increase the investigator's administrative workload. The RFI, published in the *Federal Register* on March 29, 2013 (78FR19329) and available on the NSB website (at: <http://www.nsf.gov/nsb/>) requires comments no later than May 24, 2013.

This RFI is issued by the NSB's Taskforce on Administrative Burdens established in December 2012 to examine the administrative burden imposed on federally supported researchers and offer recommendations on relieving the administrative workload. The examination is in response, in part, to the various reports and surveys conducted over the past several years pointing to the drain on the research enterprise of burdensome regulations. These reports include the Federal Demonstration Partnerships surveys (2006 and on-going), the National Research Council's (NRC) Committee on Research Universities, *Research Universities and the Future of America: Ten Breakthrough Actions Vital to Our Nation's Prosperity and Security* (2012) and, notably, Executive Orders calling for *Improving Regulation and Regulatory Review* (EO 13563, January 2011) and *Identifying and Reducing Regulatory Burdens* (EO 13610, May 2012).

The NSB asks principal investigators (PIs) to identify specific tasks whether driven by Federal regulations or institutional policies that require the greatest amount of administrative work and if they receive administrative support from their institution. There are focused questions on interactions with the Institutional Review Board (IRB) and Institutional Animal Care and Use Committees (IACUC) and the development and submission of grant

proposals. There are questions exploring the redundancy of multiple agency requirements and how NSF-specific requirements could be reformed. The survey concludes with questions addressing the current Office of Management and Budget (OMB) proposed reforms of the cost and administrative Circulars.

We strongly encourage you to notify your investigators (not just NSF investigators – the NSB plays a role in advising the President and the Congress on policy matters related to science and engineering and education in science and engineering across the Federal government) of this opportunity to respond. The RFI begins with a slightly cloying acknowledgement that a response might increase the administrative burden on PIs but this is an important opportunity to voice their concerns. In addition to the RFI, the NSB Taskforce has organized a series of Roundtable Discussions that can include, in addition to PIs, the administrator's perspective on the question of regulatory burden. To attend any of the discussions identified below, please send an e-mail to Administrative-Reform-Inquiries@nsf.gov.

April 16th at Stanford University in Palo Alto, CA 4:00 PM
(Location TBD)

April 30th at Tufts University in Boston, MA 11:30 AM at the
Winthrop Street Function Hall

May 1st at Georgia Tech in Atlanta, GA 1:30 PM at the Georgia
Tech Global Learning Center

Recognizing that the NSB seeks the PIs' perspectives in the RFI responses, COGR will prepare a response that will attempt, in part, to describe how the Federal regulatory environment drives institutional policies and the need for a careful consideration of how redundant regulations contribute to the burden on investigators. We hope to offer a general context that describes the nexus of Federal regulations and institutional compliance obligations and the role that all participants – investigators,

institutions, Federal agencies, and auditors and inspectors – play in creating administrative burdens. As noted above, comments are due no later than May 24, 2013. In addition, COGR will consider the Roundtables as an additional opportunity to bring a broader perspective to the question of administrative burden.

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