

Faculty Perspective	Government Issues	University Compliance Concerns
<p>“Active researcher who teaches, consults, and works far beyond a 40-hour week can be a hard animal to track...” Nature</p>	<p>“Simply put, it’s against the law to apply resources from an existing grant towards a new project.” Science</p>	<p>“Compliance officer positions are probably the biggest growth industry in terms of administrative positions at major research universities.” Science</p>
<p>“Mid-career researchers winning their first RO1, 70% said they had used funds awarded for one project for other projects within the previous three years.” Nature</p>	<p>“Federal agencies are [now] less willing to treat universities differently than they would treat a defense contractor’ with regard to documenting costs and time spent on projects.” Science</p>	<p>“Two common stumbling blocks are 1. trying to separate time spent on patient care form time spent on a clinical trial, and 2. assigning existing federal grants effort devoted to gathering data for an unfunded project.” Science</p>
<p>“The federal government didn’t always press scientists to follow its rules to the letter. ...A-21 allows for some flexibility, and ‘since no one was enforcing it, people shaded more on the latitude of it”” Science</p>	<p>“But for auditors, a scientist’s productivity isn’t what matters.” Science</p>	<p>“In the halls of US academia, stories abound of brilliant researchers whose time-reporting for their several big grants would add up to well over 100% of their time.” Nature</p>
<p>“There’s a dynamic tension ‘ between accountability and intellectual freedom. ‘Where’s the creative energy that has been the hallmark of science?’” Science</p>	<p>“If the principal investigator is going to be very strongly involved in the intellectual leadership of the project, NIH wants to be assured that that person is spending sufficient time.” Science</p>	<p>“Harvard Medical school has self-reported ... and agreed to return \$3.3 M after a researcher at an affiliated hospital improperly reported and used training funds for research.” Nature</p>
<p>“Scientists and university administrators would like the government to focus on the accomplishments of the research project rather than the percentage of a researcher’s time devoted to it. “ Science</p>	<p>“A fundamental assumption ...is that it’s relatively easy for scientists to allocate their time among various projects.” Science</p>	<p>“Who should be held responsible is the big issue.” Nature</p>
<p>Dudley’s (sic) lab runs on grants from NIH, the VA, and the American Heart Association. Dudley also teaches, runs an NIH-funded clinical trial at Emory university, and sees patients at the VA Medical Center, where he ‘s chief of Cardiology.” Science</p>	<p>“Federal agencies require applicants to estimate how much time they will spend on a particular project, and if successful, notify the funder if their workload changes during the course of the project.” Science</p>	<p>“Either there are rules or there aren’t rules. The government getting into the business of just being helpful...is easily misinterpreted.”” Science</p>
<p>“‘I’ll just go home and work on my grant.’ ...That assumption is not correct....All effort matters and needs to be counted in the equation.” Science</p>	<p>The November, 2005, (sic) HHS guidance appears to stress “timekeeping” more heavily than does A-21.” Science</p>	<p>“One of the most common problems in a federal audit...is a university’s failure to properly document faculty time and effort.” Science</p>

