

Summary of Preliminary Comments Received by Principal Investigators on Time & Effort Reporting at Texas A&M University

May 21, 2008

Proposed time and effort reporting as described in document T&E System Policy_ver1.4DRAFT.docx is an important issue for PIs at Texas A&M University. PIs recognize the importance of compliance with federally-mandated effort reporting and want to participate in the development of a reporting process that achieves the desired goals in a way that does not adversely alter the research environment and that ensures efficient use of PI time. A preliminary summary of PI initial concerns is listed below. PI concerns have been categorized into three broad areas: required reporting, periodicity of reporting, and streamlined reporting.

The issues raised in this proposed TAMU System mandate are complex and PIs have only had a very first look at proposed policy changes. For the reporting system to truly achieve its goals, and at the same time improve the research environment at TAMU, PIs need to be included in policy and reporting process development on an ongoing basis. Comments here are only an initial response.

- ***The policy should explicitly state what types of documentation will be required from each PI.***

Specific PI comments:

What happens within the university if the time and effort don't match up to that demanded by the sponsored grant? What counts as administrative effort? What counts as teaching? What types of activities are actually allowable to be counted as research?

Even if my time was consistently divided between the aspects of faculty work (research, teaching, service), multiple projects do not lead to clean categorization of multiple efforts. I have two grants, both external, but being a junior professor also use some of my startup funds to fund new lines of research. If I am teaching my graduate students to do a new technique in lab, which grant would that effort be recorded as? What if I'm working on a project that is applicable to two grants, but one grant is for 250,000 a year, and the other for 50,000? Do I record my effort equally (which over-emphasizes the smaller grant)? Or seminars and symposia, which benefit all projects? Or reading a paper, or doing library research, which do not apply to any "project" but certainly are necessary for my viability in getting new grants?

At my department we have all employees sign a monthly or biweekly time sheet certifying their efforts. Salaried employees indicate percent effort by project or university account. Wage employees provide actual hours worked on each project. These documents are signed by a supervisor. A payroll record is sent to the university and R[esearch] F[oundation] who cooperate to pay people in accord with these documents. The university should take care that any documents that they ask employees or supervisors to certify agree with these records.

It seems to me the rules/protocols described are exactly as things are being done currently. I'm not sure that only electronic reporting should be acceptable since the[re] can be problems with that mechanism also.

- ***Periodicity of reporting should recognize the idiosyncratic nature of research. Research requires commitment of sustained effort for durations of time that are often not divisible by hours of the day or days of the week. Effort reporting needs to take a longer-run view. Reporting requires careful and clear definitions. Often work on different projects is over lapping, assigning work to one project or another is difficult.***

According to "Time & Effort Reporting at Texas A&M University" (May 2008)

Time and Effort Reports describe the distribution and allocation of 100% of an individual's actual time and effort for the semester for all activities including time spent on sponsored projects, teaching, cost sharing on academic accounts, etc. The time worked is a percentage of the total activity for the individual regardless of whether the workweek was 40 hours or 80 hours. Time and Effort reports will be certified three times a year on a semester basis.

Specific PI comments:

[R]esearch is a creative process which is not anything you sit down for from 9 to 11 and then switch to administration or teaching. Ideas come or come not uncontrollably, even at times which are not considered working hours. Furthermore, ideas may develop unconsciously while performing other tasks. On the other hand, thinking hard about a problem during sponsored hours may have no effect at all.

I do not see that this Regulation "understands" the vagaries of how research is conducted. The paradigm seems to be that we have a steady pie-chart of effort, doled out to all of our projects, that we can easily reference. In truth, our effort is incredibly inconsistent. When I'm teaching, I can spend 80% of my time doing that, and ignoring my research. When not teaching as much (or as intense of a module during the course), I may spend all of my time on research. During breaks (including summer), the equation is even more lopsided, but even while I am on research funding (in the summer, when TAMU does not pay me), I spend considerable time on University business - teaching preparation, conferences, ...

The real concern comes from coordinating the 'time and effort' requirements with the way the university manages people. ... Fundamentally, when a grant 'buys' 3 months of your time, they have bought 25% of your effort. This includes all your effort, not 10 hours from a nominal 40 hour week. This is especially difficult for research scientists and research professors who are 100% soft money. They have no allowable time to write grant proposals, serve on committees, or otherwise do any university activity that cannot be justified as service to the grants and contracts they currently hold. Arguably, even the grant administration should be covered by the university and not the grant. This often conflicts with promotion policies as well, since to be promoted the scientist must write grants, help students, and do other activities that are not strictly grant related. The university thus has to pay for a certain level of effort for every faculty member and research scientist.

[I]t doesn't matter how many hours you work only % effort i.e. it doesn't make a difference whether you spend 1 or 10 hours on a project in a week only what % of your effort it was. So fools like me that work on things like books at night must then spend more hours on the project to keep the % effort correct!

It seems that the system should be set up to recognize that 100% of 9 months is different than 100% of 2 months. Adding sponsored research during the summer does not reduce the effort toward the academic appointment. Basing all effort on a 12-month scale would more accurately reflect changes in effort.

Typically, research is sponsored by summer salaries. That would indicate that a faculty member does all research on a grant in the sponsored month while not doing any service to A&M like advising students or administrative duties. ... this is not true. We work on our research during the semesters, while on the other hand continue non-sponsored activities during the summer. [Putting] inflexible practices in place [may] prove harmful to the research ...

Another issue that seems difficult to incorporate into this is the total effort we spend. Although the Regulation draws a distinction between payroll hours and effort, the two are not easily disentangled. How do I report a 60-70 hour work week (for myself or my students)? Do I report percentage, which could short-sell projects (fractionally, I could spend 50% on a project, but have certainly put in enough hours, based on a 40-hour work week)? If a student is paid from one grant, but uses equipment purchased from a second, and consumable reagents from two others, how do I report effort?

A standard NSF grant pays one or two months summer salary to do research: Proposal reporting: The research will have to say that only research (100%) was done during summer I and II but won't have to report during the rest of the year because the grant was funded only during the summer. Reality: We work with our graduate students and some of our graduate students all year long, so at no time are we really 100% research. Furthermore, we work 20-40% on the grant research during the academic year.

An NSF infrastructure to run a summer program such as an REU. Proposal reporting: 100% on the summer program during the appropriate time, none outside of it. Reality: Much work is done during the year such as advertising, admissions work, and preparation, all of which will go unreported. During the program, there will be times during the day that students will be working by themselves or in small groups, so the professor will be working on other things then, such as working with graduate students or doing research, while still available to the program students.

A grant that doesn't provide money for the support of the PI such as a grant for travel for undergraduates to conferences. Proposal reporting: unclear Reality: It takes time and effort to recruit the students, teach them about how to attend conferences, etc., but these won't be reported because we are paid 100% by the University.

- ***Reporting should not be overly burdensome and should be transparent and easy for all parties to understand. The system should not impose the most stringent reporting requirements where they are not required, as this will impose considerable lost time for PIs.***

Specific comment-8.4.1 Regularly Scheduled Systematic Review

The internal review should ensure not only “the system’s effectiveness and compliance with the above standard” but also evaluate burden of reporting and strive to improve the reporting system for transparency and facility.

Specific PI comments:

Faculty will spend valuable time on this. For a reliable accounting, I would calculate at least one hour per week, which will be lost to A&M. Add that to the additional time needed to get back into a creative mood.

This looks like too much paperwork. Reports "no less frequently than" every six months for profs, every one month for others, (including grad students). All the record keeping ... detracts from research. How can we put forth 100% effort" towards research projects when we have to perform all this paperwork? Can't we have less frequent reporting? Whatever is done, I hope the time required of researchers will be minimized.

[T]he included guidelines from www.whitehouse.gov do not seem to mandate such a system. To the contrary, they acknowledge the differences between academic and other institutions by being quite vague on the details. In section 10(c), several acceptable models are presented. The current draft seems to be modeled after model (2) "After the fact Activity Records". On the other hand, the current distribution between university salary (9 months) and sponsored summer salary is reflected in model (1) "Plan Confirmation". I cannot see a reason in this document that would mandate such a change. ... The policy introduces micro-management that is harmful to the cause wherever applied. ... a policy based on the "Plan Confirmation" paradigm would keep bureaucracy at a much lower level and use existing result oriented methods instead of micro-management.

It is my understanding that most universities do NOT require such accounting except where it is mandated in the terms for a given contract or grant. Indeed, under terms of the Federal Demonstration Project (still in effect so far as I know) which governs most university grants from DOE and NSF, the institution and the PI is given broad latitude on such matters. ... [it is important not to] find the most onerous restriction imposed by ANY grant, and apply it to ALL grants. ... [with] that approach, we will head down instead of up in our research productivity.

The proposed reporting system is more restrictive than the accompanying federal regulation and won't reflect reality for most faculty who teach during the academic year. The truth is that we work on the grant during the teaching year when we are not paid off the grant and work on other things, such as tending to our graduate students, when we are on the grant.

[T]his Regulation ignores the difficulties and intricacies in reporting effort. This is a one-size-fits all Regulation, which is a ... misunderstanding of the differences between Engineering contracts, NSF and NIH grants, Library research, humanities research, teaching and the hundreds of other types of "effort" the University personnel is are involved with. ... my recommendation is to decrease the frequency of reporting as much as possible. At least by reporting these statistics yearly or biannually, we can smooth over some of the peaks and valleys of time. The finer the resolution, the more cumbersome ... this reporting system becomes. It would be wise to retain a far-sighted view: a wisdom that the federal regulation seems to understand.