

November 16, 2011

**MICHAEL ALLRED**

Associate Vice Chancellor  
Accounting and Financial Services

**Re: Draft Guide to Research Compliance**

The Davis Division of the Academic Senate forwarded your request for review to all of the standing committees of the Division as well as Faculty Executive Committees within each college/professional school. Detailed responses were received from the Committee on Research and Faculty Executive Committee from the School of Medicine. The Division supports their position.

Committee on Research Comments

"The Committee on Research discussed the draft guide to research compliance. Although the committee was not able to fully evaluate the revised document because the original version was not provided, the committee has the following comments:

**1. Expense Categories to Watch Section (page 12)**

Purchasing shared equipment using cost sharing has become very difficult on this campus. The requirement to have each percentage justified is unreasonable. The percentages cannot be accurately justified in most cases. UC Davis rules regarding shared equipment should be no more stringent than those of the sponsor. COR recommends removing the word "proportionately" from the 1st bullet point under "Important considerations before purchasing equipment on a sponsored project" under the Equipment heading.

**2. General Purpose Computers, Software and Computer Supplies (page 13)**

This section is basically stating that computers cannot be bought with grant funds. UCD is being more restrictive than the funding agencies. Who considers this as an indirect cost? This should be considered a direct cost. All faculty involved in research need a general use computer to conduct their research which includes word processing and producing spreadsheets. COR recommends that this entire paragraph be replaced with the following paragraph from UC Berkeley's policy about general use computers:

**Computers (inventorial and non-inventorial) used to accomplish the technical scope maybe charged directly to sponsored awards provided they can be specifically identified to and benefit the project, are included and justified in the budget and are not specifically disapproved by the sponsor. Computers used for administrative work would need to meet the tests of allow ability to be directly charged to a sponsored award. In this example, the computers used for general communication could be directly charged as they are required for the technical conduct of the sponsored agreement, provided they have been proposed and justified and not specifically disapproved by the sponsor, but would need to be justified along A-21 guidelines for major projects if an administrative cost. In either case, the cost should be distributed to all benefiting activities using a reasonable basis described by A-21 or in campus policy.**

<http://controller.berkeley.edu/efa/faq/costPrinciplesFAQ.htm#distribution>

**3. Biosafety (page 21)**

The wording of portions of the Biosafety section of the document is unintentionally or inappropriately expansive. For example, "A Biological Use Authorization (BUA) from the Institutional Biosafety Committee (IBC) is required for any research or other work that involves recombinant DNA or other biohazardous agents or materials" does not adequately take into account that, as indicated elsewhere in this document, exemption requests are appropriate and can be requested in many cases. Similarly, the sub-paragraph "Biohazardous agents include animals, plants, bacteria, viruses, Chlamydia, rickettsiae, parasitic/infectious protozoa, metazoan animal or human parasites, prions, certain toxins, all viral vectors, etc." would appear to identify all animals, plants, and bacteria as biohazardous, by not making clear the connection to the preceding paragraph that would limit this definition to pathogenic, infectious, etc. organisms. More broadly, is this document an appropriate place for such specifics, or would those points be better detailed on the EH&S and the Biosafety committee website?

4. In regards to the three bullets at the bottom of Page 18, COR recommends switching the order of the spaces and periods after the italic titles.
5. On the bottom of Page 23, COR recommends inserting a statement about protective eyewear in relation to lasers.

There was significant support for further review of the issues surrounding transition and implementation by forming a steering committee to ensure academic needs and administrative priorities are met.”

School of Medicine Faculty Executive Committee Comments

“Information in the brochure appears to be redundant given the level of expertise and experience invested in current department-based, managerial staff, many of whom are now Certified Research Administrators (CRAs). This appears to address an almost non-existent problem. Problems in the system do exist however. For instance, the scrutiny of proposals by the Office of Research is redundant when most grants are prepared by CRAs. Why train and certify these staff if not to save time in grant approval in the OR? This seems especially non-sensical when federal grant success rate is 10% or less, meaning that 90% of the time taken by central administrative review is spent on what will prove to be unsuccessful applications. It is effectively wasted on unsuccessful proposals which in most cases have been prepared appropriately already in departments by CRAs.”

In summary, the Davis Division finds merit in the goals that these changes attempt to address, but see no compelling reason why our internal policies should be more restrictive and time and resource-consuming than what is required or allowable by the agencies.

Sincerely,



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Davis Division of the Academic Senate  
Professor: Viticulture and Enology