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Financial Reporting  
Requirements

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Resources, Community, and  
Economic Development Division

B-245696

July 13, 1992

The Honorable John Glenn  
Chairman, Committee on  
Governmental Affairs  
United States Senate

Grant Management:  
Benefits and  
Burdens of  
Increasing NSF  
Financial Reporting  
Requirements

Dear Mr. Chairman:

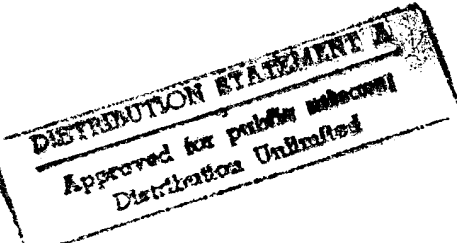
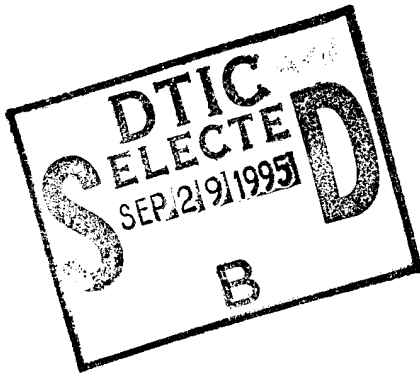
As you know, the National Science Foundation (NSF) is an independent agency of the federal government that was established in 1950 to promote and advance scientific progress in the United States. NSF supports science primarily through grants. In its current 1992 budget of \$2.6 billion, NSF is funding over 25,000 active research grants. Most of the grant funds go to universities.

Because of concerns about the ability of NSF to effectively administer its growing volume of grants, you held a hearing on September 24, 1991, to surface and discuss NSF oversight issues. At that hearing, we testified that NSF relies heavily on grantee institutions to ensure that funds are spent in accordance with applicable federal guidelines.<sup>1</sup> Concerned that NSF receives limited financial expenditure information from its grantees, you asked us to obtain additional information on NSF financial reporting requirements to help you assess whether this subject warrants further review. Specifically, you asked us to (1) document NSF financial reporting requirements, (2) identify the extent to which NSF grant funds have been shifted between budget categories and find out if large individual budget shifts were used appropriately under current NSF guidelines, and (3) obtain the views of NSF and university officials on increased financial reporting requirements. As agreed, we built on our work for the prior testimony by focusing on two of NSF's largest grantee institutions—the University of Chicago and the University of Michigan. We also agreed to provide an update on the efforts of the Department of Health and Human Services (HHS) to require additional financial reports from its grantees. HHS is the cognizant audit agency for most of NSF's grantees.

This briefing report serves to formalize the information we presented to your staff.

In summary:

<sup>1</sup>Grant Management: Improvements Needed in Federal Oversight of NSF Grants (GAO/T-RCED-91-92, Sept. 24, 1991).



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- NSF requires grantees to submit quarterly Federal Cash Transactions Reports, which provide information on the total amount of grant funds spent for each individual grant. In addition, NSF could require, under Office of Management and Budget (OMB) guidelines,<sup>2</sup> the submission of Financial Status Reports. These reports provide summary information for each grant concerning the status of items such as program income and indirect cost charges. In accordance with its philosophy of minimizing reporting requirements, NSF has elected not to require submission of the Financial Status Report for its grantees. NSF has also delegated to the grantees the authority to approve reprogramming of grant funds between budget categories, as long as such reprogramming follows federal guidelines. (See sec. 1 for further details.)
  - Under current NSF requirements, grantee institutions may approve most grant shifts between budget categories without reporting to the federal government. At the two universities we examined, the University of Chicago and the University of Michigan, we found that small amounts of funds are frequently shifted between budget categories, but less than 15 percent of the grants we examined had expenditures that differed from the NSF-approved budget by 20 percent or more. The reasons given by the researchers for these shifts included unanticipated personnel changes to the project team, fluctuations in the costs of supplies and equipment, and the need to pursue unanticipated scientific findings. Despite the shifts of funds between budget categories, NSF officials generally concluded that funds were appropriately used for the selected grants they reviewed at our request,<sup>3</sup> and satisfactory research results were achieved with the grant funds. (See sec. 2 for further details.)
  - NSF officials said that more detailed financial information on actual grant expenditures had potential benefits. However, officials from NSF and the two universities also pointed out that increasing the financial reporting requirements would impose additional burdens on both NSF and the grantees. Accordingly, such a requirement would be beneficial only to the extent that the information could improve NSF's grant management. Several NSF program officials we interviewed indicated that they might use grant expenditure information to evaluate subsequent grant requests or to determine whether budget proposals for similar research projects are realistic. NSF grant officials, however, pointed out that there is no evidence that such additional financial information is needed or that it would result in any significant improvement in NSF's grant administration.

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<sup>2</sup>OMB is responsible for setting guidelines that govern federal financial reporting requirements for grantees.

<sup>3</sup>Due to the technical nature of NSF grants, we asked NSF program officials, who have experience in scientific research, to assess the appropriateness of charges made to the grants.

NSF officials also pointed out that there is no evidence that any benefits would justify the additional burdens that would be imposed on NSF and its grantees. Specifically, NSF officials told us that the Foundation would need additional resources to review and track the financial reports, and officials from the two universities stated that preparing financial reports would require additional resources. In addition, both NSF and university officials expressed concerns that additional reporting requirements could reduce the time scientists have to spend on research and could allow some NSF officials to micromanage the research projects. (See sec. 3 for further details.)

- HHS, which is subject to the same OMB guidelines as NSF, has requested that OMB allow it to increase financial reporting requirements for its grantees. As reported in recent HHS Federal Managers' Financial Integrity Act reports, HHS believes that the limited financial information reported by its Public Health Service grantees constitutes a material weakness in the agency's ability to adequately monitor its grant programs. OMB has denied these requests because it believes projects could be adequately monitored through other mechanisms, such as audit reports. HHS is continuing to study the issue and plans to raise it again with OMB. (See sec. 4 for further details.)

## Scope and Methodology

We conducted our work at the National Science Foundation headquarters in Washington, D.C., and, as agreed with your office, at two of its largest grantee institutions—the University of Chicago and the University of Michigan.

To obtain information on current NSF financial reporting requirements, we reviewed pertinent federal and NSF guidelines and discussed them with appropriate officials in NSF's Division of Grants and Contracts and Office of Inspector General. To analyze the extent of shifts between budget categories, we examined the financial records of approximately 100 grants at each of the two universities. We examined the most recently closed grants after excluding special purpose grants, such as the Presidential Young Investigator Awards. At the University of Chicago, therefore, we examined the 93 grants closed during the four quarters that ended September 30, 1991, and at the University of Michigan we examined the 85 grants closed during the two quarters that ended September 30, 1991. For a judgmental sample of these grants, we also obtained an explanation of the reasons for the shifts from the researchers and discussed the

appropriateness of the shifts with NSF officials. To obtain information on the potential impact of increased financial reporting, we interviewed NSF officials in various administrative and program divisions, HHS officials, and administrative officials and researchers at the two universities. We performed this review between September 1991 and January 1992 in accordance with generally accepted government auditing standards.

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## Views of Agency and University Officials

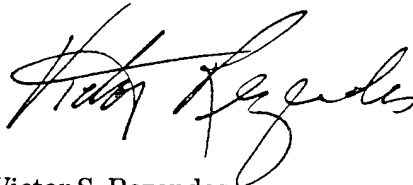
We discussed the facts in this briefing report with responsible agency officials, including the NSF Inspector General and the Director of Grants and Contracts, the Assistant Comptroller at the University of Chicago, the Assistant Director of Federal Financial Operations at the University of Michigan, and the Audit Manager at the HHS Office of the Inspector General. We have included their comments as appropriate. The officials generally agreed with the facts presented. As requested by your office, we did not obtain written agency comments on a draft of this briefing report.

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As arranged with your office, unless you announce its contents earlier, we plan no further distribution of this briefing report until 15 days after the date of this letter. At that time, we will send copies to the Director of the National Science Foundation and other interested parties, including officials at the Department of Health and Human Services, the University of Chicago, and the University of Michigan. We will make copies available to others on request.

If you have any further questions, please contact me at (202) 275-1441. Major contributors to this briefing report are listed in appendix I.

Sincerely yours,



Victor S. Rezendes  
Director, Energy and Science Issues



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**Abbreviations**

GAO	General Accounting Office
HHS	Department of Health and Human Services
NSF	National Science Foundation
OMB	Office of Management and Budget
PHS	Public Health Service

# NSF Financial Reporting Requirements

The National Science Foundation's (NSF) requirement that grantees report quarterly expenditures for each grant is consistent with federal guidelines for grantee reporting. Although federal agencies can require grantees to obtain prior approval for certain budget changes, NSF has delegated this authority to the grantee institutions. NSF officials also pointed out that they rely on other funding controls, such as (1) the federal cost principles which specify that grant charges must be allowable, reasonable, and allocable; and (2) federal audit requirements.

## NSF Requirements Comply With Federal Grantee Reporting Guidelines

NSF requires grantees to submit quarterly financial reports that provide information on quarterly and cumulative expenditures for each grant award. NSF financial reporting requirements comply with OMB's grant administration guidelines for the federal sponsoring agencies; the guidelines specify the maximum reporting requirements that the agencies can impose on nonprofit grant recipients. OMB Circular A-110 specifies that the sponsoring agencies can require nonprofit grantees to submit (1) Federal Cash Transactions Reports that provide information on total expenditures for each grant award and (2) Financial Status Reports that provide information for each grant on the status of items such as program income, unliquidated obligations, and indirect cost charges. NSF requires its grantees to submit the Federal Cash Transactions Reports. But consistent with its philosophy of minimizing reporting requirements, and as permitted by the circular, NSF has elected not to require the Financial Status Report.

## NSF Delegates Authority to the Grantees to Rebudget Funds Between Budget Categories

According to OMB guidance, federal agencies can require grantees who receive grants above \$100,000 to obtain prior approval for budget reprogrammings—transfers between budget categories—that exceed 5 percent of the grant amount. NSF has delegated the authority to approve these reprogrammings to the grantee institutions to reduce the paperwork burden and to give the researchers more latitude to pursue their scientific inquiries. At the two universities we examined, the University of Chicago and the University of Michigan, we found that most rebudgeting authority had been delegated to the principal investigator or researcher. For example, principal investigators at the University of Michigan may rebudget up to \$10,000 of their NSF grant funds to cover expenses for scientific equipment.

NSF officials pointed out that there are other controls over the grantees' use of grant funds. As with any use of grant funds, any reprogramming

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**Section 1**  
**NSF Financial Reporting Requirements**

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must be consistent with the applicable federal cost principles in terms of allowability, reasonableness, and allocability, as specified in the OMB circulars. Furthermore, the grantees are subject to federal and institutional audit requirements.

# Shifts in Grant Funds Between Budget Categories

Based on our examination of NSF grants at the University of Chicago and the University of Michigan, we found that funds were shifted between budget categories in almost all of the grants we examined. In most cases, however, the funds shifted were small in comparison with the total grant amount. For a small sample of these grants, we had the principal investigators explain the reasons for the budget shifts. NSF program officers generally were not concerned about the types of budget shifts in the grants selected for detail examination because (1) they found that the researcher appeared to have used the funds appropriately and (2) the program officers were satisfied with the research results.

## Shifts Between Budget Categories Were Frequent but Generally Small

As shown in table 2.1, we found that funds amounting to 5 percent or more of the total grant were shifted between budget categories in at least one-half of the grants. However, shifts of 20 percent or more of the grant amount occurred in only about 15 percent of the grants examined. To quantify the extent of the shifts between budget categories, we identified the category that showed the greatest difference between NSF-approved budget amounts and actual expenditures and calculated what percent the difference was of the total grant. The grants we examined ranged in size from \$3,300 to \$737,000 at the University of Michigan and from \$200 to \$1.2 million at the University of Chicago.

**Table 2.1: Percent of Grants Where Funds Were Shifted Between Budget Categories at the Universities of Chicago and Michigan**

Percent of grant amount shifted to the budget category that showed the largest change	Percent of grants with budget shifts	
	University of Chicago	University of Michigan <sup>a</sup>
20 percent or more	15	14
10 to 19 percent	15	15
5 to 9 percent	25	22
less than 5 percent	45	48

<sup>a</sup>Percentages do not total 100 due to rounding.

## Fund Shifts Generally Caused by Unanticipated Events

Principal investigators at the two universities indicated that because of the unpredictable nature of scientific research, expenditures sometimes deviate from the NSF-approved budget. The explanations provided by the investigators for the budget shifts included, among others, the following:

- Unanticipated scientific findings or discoveries that have to be pursued.

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**Section 2**  
**Shifts in Grant Funds Between Budget**  
**Categories**

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- Additional funds from other sources, such as student fellowships or other agency awards.
- Unanticipated personnel changes, such as the premature departure of graduate student researchers or the addition of visiting scientists to the project.
- Fluctuation of costs for supplies and equipment.
- Fluctuation of the value of the U.S. dollar, which impacts foreign travel costs.
- Unexpected difficulties scheduling project experiments at other laboratories.
- Unanticipated maintenance costs for research equipment.

Several of the cases we examined in detail illustrate the type of budget shifts found and the explanations for these shifts.<sup>1</sup> For one NSF grant that totaled \$503,300, our comparison of actual expenditures with the budget approved by NSF when the grant was awarded showed that the grantee spent about \$43,000 more for salaries than originally planned. According to one of the principal investigators, salary costs were higher than originally planned because (1) the budget did not include the salary costs for a co-principal investigator who was added to the project team after the grant had been awarded, and (2) salaries had to be paid for a longer period when the term of the grant was extended.

For a second grant that totaled \$999,746, the grantee spent \$39,000 more for services, \$40,000 more for supplies, and \$71,000 less for personnel costs than planned in the budget approved by NSF. According to the principal investigator, since funds to cover salary costs were received from alternative sources, the NSF funds were used for additional services and supply needs.

For a grant totalling \$1,185,315, expenditures for equipment exceeded the budgeted amount by about \$92,000. However, expenditures were less than budgeted for the categories of personnel (\$45,000) and travel (\$19,000). According to the principal investigator, the original equipment cost estimate was inaccurate, and the research team had difficulties fabricating the equipment. The principal investigator also explained that personnel costs were lower because (1) fellowship funds were awarded to the student research assistants and (2) travel expenditures were lower than

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<sup>1</sup>We judgmentally selected a sample of seven grants for more detailed study from the 95 grants where budget shifts were more than 5 percent of the total grant amount and the amount of the shift was at least \$5,000. We limited our selection to this group of grants because an NSF official indicated that shifts of 5 percent or more might indicate a change in the project's scope and because A-110 allows the agencies to require the grantees to get approval for transfers of funds of that amount.

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planned because the project was completed earlier than expected and housing costs were lower than originally estimated.

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## NSF Officials Generally Found Budget Shifts in Our Sample to Be Appropriate

NSF program officers told us that such budget shifts are not unusual, and they found the principal investigators' explanations for the budget shifts to be reasonable. One program officer believes that grant expenditures are appropriate as long as the funds are spent within the principal investigator's area of research. Another program officer said that he did not feel that grant budget shifts necessarily indicated a change in the scope of the project, which would require NSF approval. The program officers expressed strong concerns about the expenditures for only one of the seven grants we examined. The cognizant program officer for the grant in the third example told us that he thought the principal investigator could have used the funds more effectively on costs such as student research salaries. Specifically, the program officer was concerned about the expenditures of about \$46,000 for secretarial assistance and the fact that budget funds for travel were not used for that purpose. The program officer, however, indicated that he would not have questioned grant expenditures such as these because (1) he was satisfied with the scientific results from the grant and (2) the principal investigator had a successful record of producing some of the country's finest researchers.

According to NSF officials, approved budgets are the basis for awarding, not expending, funds. The principal investigator must submit and justify his or her proposed budget by specified categories, such as equipment and travel. In pre-award budget negotiations, however, NSF is primarily concerned with the total grant award amount, not the amounts for individual budget categories. This approach was adopted due to the fact that NSF allows most post-award budget changes by the principal investigator or the grantee institution without NSF prior approval.

# NSF and University Officials' Views on Increased Financial Reporting

NSF and university officials pointed out that the benefits to be achieved from increased financial reporting have to be weighed against the burden imposed by such reporting. In general, the burden involved will depend on the specific type of reporting required. Although some NSF program officials identified ways they could use additional financial information, NSF grant officials said that there is no evidence that either such additional financial information is needed or that it would result in any significant improvement in NSF's grant management. The officials we interviewed agreed that increased financial reporting requirements would impose additional burdens on both the grantees and NSF.

## Impact of Additional Requirements Will Depend on the Timing and Format of Any Required Reports

Both the usefulness of the additional financial information and the additional burdens imposed will depend on the format of the reports and when they would have to be submitted.

According to discussions with NSF and university officials, the most likely timing for the reports would be either at the end of each year of the grant,<sup>2</sup> 6 months before the expiration of the grant (when applications for subsequent grants are generally submitted), and after the grant is financially closed. The burden imposed on the grantees would be greatest for the first approach and the smallest for the last approach. NSF officials pointed out that yearly reports would generate a lot of information of limited usefulness, since they would expect funding patterns to vary considerably over the life of the grant. The second approach would allow NSF to use the information in evaluating the next grant, but the grantees point out that they would have to estimate expenditures for the last 6 months of the grant to give the total picture. The third approach would provide statistical information but could not be used directly in administering a particular grant.

Similarly, NSF could accept the financial reports generated by the individual university accounting systems or require that reports be prepared in a standard format, such as the one currently used in NSF grant proposals. Accepting reports generated by the grantee's system would impose the least additional burden on the grantee. In contrast, a standard report format would make the information more useful to NSF but impose a larger burden on the grantee. We found that the two universities we examined generated monthly line-item expenditure reports for each grant; however, they categorized the expenditures in different ways. For example, the University of Michigan reports all salary expenditures in one

<sup>2</sup>Most NSF grants are for 3 years, with funding provided in yearly increments.

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**Section 3**  
**NSF and University Officials' Views on**  
**Increased Financial Reporting**

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category, while salaries at the University of Chicago could be reported in as many as five different categories. Requiring that expenditures be reported in the same categories as the ones used for the budget submitted with the grant applications would facilitate comparison of planned and actual expenditures, according to NSF officials.

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**NSF Officials Believe**  
**Additional Financial**  
**Data May Not**  
**Significantly Improve**  
**Grant Administration**

The NSF program officers we interviewed indicated that in some programs additional financial reports might provide useful information. For example, NSF program officers could use such information in determining whether budget proposals for similar research projects are realistic or in evaluating future budget proposals from the same principal investigator. The NSF official for a program that primarily funds archeological field trips, however, pointed out that such comparisons would be useless for his projects because political and economic conditions, and costs for items used in field research, vary so much from country to country. NSF could also develop statistical information on actual grant expenditures for each line-item category. However, NSF officials pointed out that there is no evidence that such additional financial information is needed or that it would result in any significant improvement in NSF's grant management. Furthermore, the NSF officials said that there is no evidence that any benefits obtained would justify the resulting burdens.

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**Additional Reporting**  
**Requirements Would**  
**Increase**  
**Administrative**  
**Burden on NSF and**  
**Grantees**

According to NSF and university officials, increased financial reporting requirements would create more administrative burdens on both NSF and the grantees. The grantees would need additional resources to prepare the reports, and NSF would need additional resources to review and track the reports. These officials also expressed concern that reporting requirements could require the researchers to spend additional time on administrative requirements and could allow the NSF program officials to micromanage the project to the detriment of the research activity.

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**Potential Impact on**  
**Grantees**

Administration officials from both universities said that the required submission of an additional NSF report would require additional resources. For instance, a University of Michigan official estimated that one additional accountant would be needed to prepare these reports if a standardized format were required.

As mentioned earlier, the resources needed will depend mainly on the timing and format of the reporting. Other factors that could also affect the

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**Section 3**  
**NSF and University Officials' Views on**  
**Increased Financial Reporting**

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resources needed are how the information is to be transmitted to NSF (electronically, mail, or facsimile), whether the information is sent to a central receiving point or directly to the cognizant program officers, and who at the university must certify that the information is correct. Because of the burden imposed by variations in requirements between federal agencies, officials at both universities emphasized that any reporting requirement should be uniform for all federal agencies.

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**Potential Impact on NSF**

To illustrate the impact on NSF, one official estimated that NSF would receive 25,000 additional reports each year if the grantees were required to submit detailed financial reports annually and at the end of each grant. Administratively, NSF would have to ensure that the reports are submitted, reviewed, and filed. The NSF official believed a new system may have to be implemented to track these functions. NSF officials also expressed concern about the additional burden such financial reports would impose on the program officers. Those interviewed believe that the current workload for NSF program officers is high. NSF program officers are responsible for reviewing new grant proposals, making recommendations on new grant awards, monitoring the scientific progress of active grants, providing supplementary funds for active grants, and keeping in contact with principal investigators. One NSF program officer said that he annually reviews approximately 150 to 160 grant proposals and monitors about 60 new grants.

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**Potential Impact on**  
**Research**

NSF and university officials we interviewed expressed concern that the additional financial reporting requirements could result in the principal investigator having to give up research time in order to complete additional administrative forms. For example, the principal investigator would have to be involved if reports were prepared that included estimated expenditures for the final 6 months of the grant.

The NSF and university officials were also concerned that some NSF program officers may use the increased financial information to micromanage the research projects. NSF officials indicated that detailed line-item expenditure information could allow the NSF program officer to micromanage the grants by challenging expenditures that vary from the award budget, even though NSF has delegated such reprogramming authority to the grantees. Most officials we interviewed believe that micromanagement would hurt research productivity and interfere with the researcher's ability to achieve his or her scientific objectives.

# Federal Actions Regarding Grantee Financial Reporting Requirements

The Department of Health and Human Services (HHS), which is subject to the same OMB guidelines as NSF, has proposed increased federal financial reporting requirements for its grantees. In order to require additional financial information on an agencywide basis, however, a federal agency must demonstrate to OMB that the additional reporting (1) is the least burdensome necessary for the agency to carry out its program objectives, (2) does not duplicate already obtainable information, and (3) has practical utility. Thus far, OMB has not allowed HHS to require more than the maximum reporting requirements specified in OMB Circular A-110.

## HHS Is Trying to Increase Reporting Requirements for Its Grantees

HHS believes more detailed expenditure reporting from its grant recipients is needed. Since 1989, the HHS Federal Managers' Financial Integrity Act Reports have concluded that the limited financial information reported by Public Health Service (PHS) grantees constituted a material weakness to the agency's ability to adequately monitor its grant programs. HHS has asked OMB to waive the A-110 provision several times.

In turning down HHS' first request, OMB noted that projects could be adequately monitored through other mechanisms, such as audit reports, site visits, requests for prior approval actions (such as rebudgeting changes), and technical program reports. In February 1991, HHS again requested that OMB waive the A-110 provisions because its ability to adequately monitor its grant programs had been greatly reduced. HHS disagreed that the other mechanisms cited by OMB were adequate; it noted that organization-wide audits are not performed frequently enough for monitoring individual grants; the number of site visits has been reduced by federal budget cuts in travel funds; and the prior approval authority for budget shift changes has been delegated to grantees participating in the Federal Demonstration Project.<sup>3</sup>

In an April 1991 letter to OMB supporting the Department's request, HHS' Inspector General concluded that more detailed reporting was necessary because federal program managers could not readily monitor grantee performance in terms of costs with the summary financial information currently provided. In particular, the Inspector General cited recent reviews of grant programs that had found that grants management was severely impaired by the absence of detailed expenditure reporting. The Inspector General also cited another report that indicated that the lack of

<sup>3</sup>The Federal Demonstration Project was established in 1988 as a cooperative effort among a number of mostly academic institutions and federal research sponsoring agencies, including NSF and HHS, to increase research productivity by eliminating unnecessary administrative procedures and by streamlining and standardizing needed controls.

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**Section 4  
Federal Actions Regarding Grantee  
Financial Reporting Requirements**

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detailed data on actual expenditures appeared to be one of the factors driving research costs up and that accountability for federal resources was diminished.

In June 1991, OMB again turned down HHS' request. HHS is continuing to study the issue of increased grantee financial reporting requirements and plans to raise it again with OMB.

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**Debate Among  
Federal  
Demonstration  
Project Participants  
Unresolved**

According to the NSF representative to the Federal Demonstration Project, the participating agencies have not yet reached a consensus on financial reporting requirements for grantees. In October 1991, the Federal Demonstration Project Task Force, which had been examining the issue of standardizing grantee financial reporting, recommended the adoption of grantee financial reporting requirements similar to the NSF financial reporting requirements. At a November 1991 Federal Demonstration Project meeting, a PHS representative proposed the adoption of line-item financial reporting from grantees. These proposals were not adopted.

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