



OFFICE OF THE VICE PRESIDENT – RESEARCH & INNOVATION

RESEARCH POLICY ANALYSIS & COORDINATION
1111 Franklin Street, 11th Floor
Oakland, California 94607-5200
Web Site: <http://www.ucop.edu/research/rpac/>
Tel: (510) 587-6031
Fax: (510) 987-9456

February 27, 2023
(via www.regulations.gov)

Manager
Strategic Collections and Clearance Governance and Strategy Division
U.S. Department of Education
400 Maryland Avenue SW
LBJ, Room 6W203
Washington, DC 20202-8240

Re: Docket ID Number ED-2022-SCC-0159, Agency Information Collection Activities;
Comment Request; Foreign Gifts and Contracts Disclosures

Dear Manager:

On behalf of the University of California (UC) system, thank you for the opportunity to respond to the U.S. Department of Education's request for comments on the collection of information required under Section 117 of the Higher Education Act (HEA)(20 §U.S.C. 1011f), as published in the Federal Register on December 27, 2022 (Docket no. ED-2019-ICCD-0114) (the "Notice"). The UC system is comprised of ten campuses, six academic health centers, and three affiliated U.S. Department of Energy national laboratories.

We welcome the opportunity to provide feedback that we hope will lead to a more streamlined and user-friendly process. The current online submission of the data through the Department's Partner Enterprise Business Collaboration (PEBC) portal is currently cumbersome and time-consuming.

Estimate of Time Burden for Collection and Submission of Data

Based on the experience of campuses in the UC system, we believe the Department's estimate of ten hours to process an HEA Section 117 report is unrealistic and significantly underestimates the burden.

We conservatively estimate it takes 29 hours to prepare and submit data for each six-month cycle. Data entry alone can take 17 hours, considering an average of 7-10 minutes to enter each gift/contract into the portal, and that it is not unusual to have reports consisting of 100 gifts or contracts. In addition, we typically need between 5-12 hours to collect, analyze and consolidate information from a variety of different units that may receive foreign gifts or contracts (e.g., sponsored programs offices, development offices, real estate, hospital departments, etc.). This

estimate does not include the time required to create internal reporting queries and tools for the generation and accumulation of data. Therefore, our estimate is at least triple the Department's estimate.

Data Entry and Submission Improvements

The overall time required to prepare and enter data emphasizes the critical importance of streamlining the HEA Section 117 process. UC campuses identified the following potential improvements.

Single File Upload

First, we urge the Department to allow upload of data on a *single file* for all reportable gifts and contracts. At present, the Department's online PEBC portal requires the manual entry of each gift or contract individually. However, even before entry into the portal, campuses first collect information regarding all foreign gifts and contracts, then consolidate the information into a single report (e.g., on an Excel spreadsheet) to check whether the reporting threshold for each foreign entity has been met. If so, campuses then enter each individual gift/contract from those foreign entities into the portal. It would significantly reduce burden if institutions were allowed to upload the single file they are likely already creating. We note that the Federal FAA Access website currently allows the option to upload a flat file CSV for other financial aid reporting processes.

Other Streamlining Improvements

If uploading a single file is not possible, there are other streamlining opportunities. For example:

- To make the process more efficient, we suggest modifying the portal to allow reporting of more than one gift/contract in the same submission, such that these screens only appear once. Currently, every new entry in the PEBC portal requires the user to click manually through both a "Public Burden Statement" screen and a "Useful Tips" screen. For institutions with many reportable transactions, the amount of time spent clicking through these screens adds up and is frustratingly tedious.
- If multiple gifts/contracts are not permitted in the same submission, the system should allow a user the option to turn off repetitive screens after one transaction is submitted by that user.
- Standard institutional data that does not change from one transaction to the next (for example, the Office of Postsecondary Education Identification number) could be auto-populated from an institutional profile, rather than entered manually each time.
- The copy/paste function in date fields, instead of required manual entry, would save data entry time.

- Generation of a summary page of entries made for the reporting period would allow for a final review of the data prior to final submission.
- Access to data submitted by any user from the same institution would allow institutions to utilize multiple administrators for submission. In case of staffing changes, this would also allow institutions to access and correct data entered by former staff.
- The ability to delete unsubmitted entries within the portal would increase accuracy and eliminate the need for post-submission corrections when an institution becomes aware of errors or duplications prior to actual submission.
- Relaxing the security requirement to log into the system to maintain an active account from every 90 days to every 6 months (when HEA Section 117 reports are due) would reduce administrative burden. Many users have no other reason to log into the portal between report submission.

We thank the Department of Education for the opportunity to provide comments. UC is committed to developing robust and innovative research collaborations while at the same time protecting our intellectual property and encouraging transparency with respect to our interactions with foreign entities. We seek to provide accurate and complete foreign gift and contract data in accordance with the statutory requirements of Section 117 in the most efficient manner possible.

Sincerely,



Lourdes G. DeMattos

Director

Research Policy Analysis & Coordination

University of California, Office of the President