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Reduce Administrative Burden

THE ADMINISTRATIVE BURDEN ON PRACTICING SCIENTISTS HAS GROWN TREMENDOUSLY OVER the past decades and is limiting their ability to get important scientific work done. As the United States prepares for a new president to take office, there is an opportunity to take a fresh look at many of the government policies and regulations that concern the conduct of science. How might we find ways to reduce the administrative burden while still ensuring accountability to science funders, appropriate safeguards for human subjects, and broader societal protection from real dangers that can accompany some scientific research?

A 2007 survey by the U.S. Federal Demonstration Partnership (*A Profile of Federal-Grant Administrative Burden Among Federal Demonstration Partnership Faculty*) found that 84% of faculty in the United States believe that the administrative burden associated with federally funded grants has increased significantly in recent years. Most notably, the study indicates that of the total time that faculty devote to research, 42% is spent on pre- and post-award administrative activities. Some activities respond to university or host institution policies, whereas others respond to an array of governmental rules that are poorly integrated. The most time-consuming research-related activities include too-frequent submissions of progress reports, navigation of the complex and disparate rules for project revenue management, and institutional review board protocol development and revisions. The need to respond to new post-9/11 security concepts such as “dual-use research” or “sensitive but unclassified science” has also added substantially to the workload.

Virtually all of the issues underlying the governmental and institutional rules merit serious attention. Ensuring animal welfare and human subject protections are vitally important. Scientific fraud of any kind is intolerable. Conflicts of interest are inappropriate in any setting. Some science can be misused, and we owe society appropriate safeguards. Citizens deserve assurance that the scientific community is attending to these issues, and they are entitled to full accountability for the use of their investments in science.

However, as the U.S. National Academy of Sciences’ 2007 report *Science and Security in a Post-9/11 World* pointed out very clearly, we also need to prevent overreaction. We must maintain the openness that has so productively characterized the science and technology enterprise in the United States. We also need to be certain that our approaches to scientific regulation are as cost-effective as possible. A Council on Governmental Relations study (*Report of the Working Group on the Cost of Doing Business*, 2003) reported that for each of 25 surveyed U.S. institutions, the cost of compliance activities had increased some \$3 million per year over 5 years.

An ideal goal would be for every science-related rule or regulation to be rationalized and streamlined. As a group, they should be integrated as much as possible so as to reduce unnecessary duplication. New versions should address the lack of uniformity across agencies. Because the policies are variously the responsibilities of federal and state governments and of research-conducting institutions, this streamlining will require a joint effort of all sectors. The federal National Science and Technology Council, representing the leaders of the U.S. government’s science-supporting agencies, created a Research Business Models Subcommittee in 2003 to work on this problem. Their findings and efforts have not yet been felt extensively in the field, but this subcommittee might be an ideal convener for this broad rules review.

Whoever takes the lead in reducing administrative burden might consider a somewhat unorthodox approach to reviewing and revising existing regulations. Rather than starting with the evaluation of each existing policy one at a time, it might ultimately be better to start anew from an integrated list of all the issues that must be addressed, and then take an entirely fresh look at what rules and regulations should be applied. Although this might trigger fears of “re-inventing the wheel,” it also might prove the point of another old adage: “Never underestimate the value of ‘square one.’”

– Alan I. Leshner

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