

Committee on Construction Safety and Health, which was not consulted during the rule-making on these issues, and is evaluating their recommendations along with public comments requested on the records issue.

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#### **Circular A-21: An Alternative Reporting Method**

Much has been written about the effort-reporting requirements imposed upon educational institutions by the Office of Management and Budget (OMB) Circular A-21. Much of the furor appears to be due, as John J. Lordan apparently suggested to the Council of Scientific Society Presidents (News and Comment, 15 May, p. 760), to either overreaction or perhaps reaction to inappropriate interpretations of the provisions of paragraph J.6 of the circular, which authorizes and describes two alternative methods for distributing salaries and wages—either personnel activity reports or a monitored work load.

Individual faculty members and other university representatives (especially at institutions that have adopted the personnel activity alternative) have stated that the opposition results from what is perceived to be a requirement that faculty members keep track and report precisely how much time they spend on research, teaching, administration, counseling, and other activities both on campus and off.

The circular, however, provides [in paragraph J.6(b)] that "because of the nature of work involved in academic institutions, the various and often inter-related activities of professorial and professional employees frequently cannot be measured with a high degree of precision, that reliance must be placed on reasonably accurate approximations, and that acceptance of a degree of tolerance in measurement is appropriate." Certifications confirming "that the distribution of activity represents a reasonable estimate of the work performed by the employees during the period . . . will be signed by the employees or by a responsible official having firsthand knowledge of the work performed" [paragraphs J.6c(5) and J.6d(4)]. Therefore, at most institutions many individual faculty members need not be involved in the certification of their activity distribution because department heads or deans

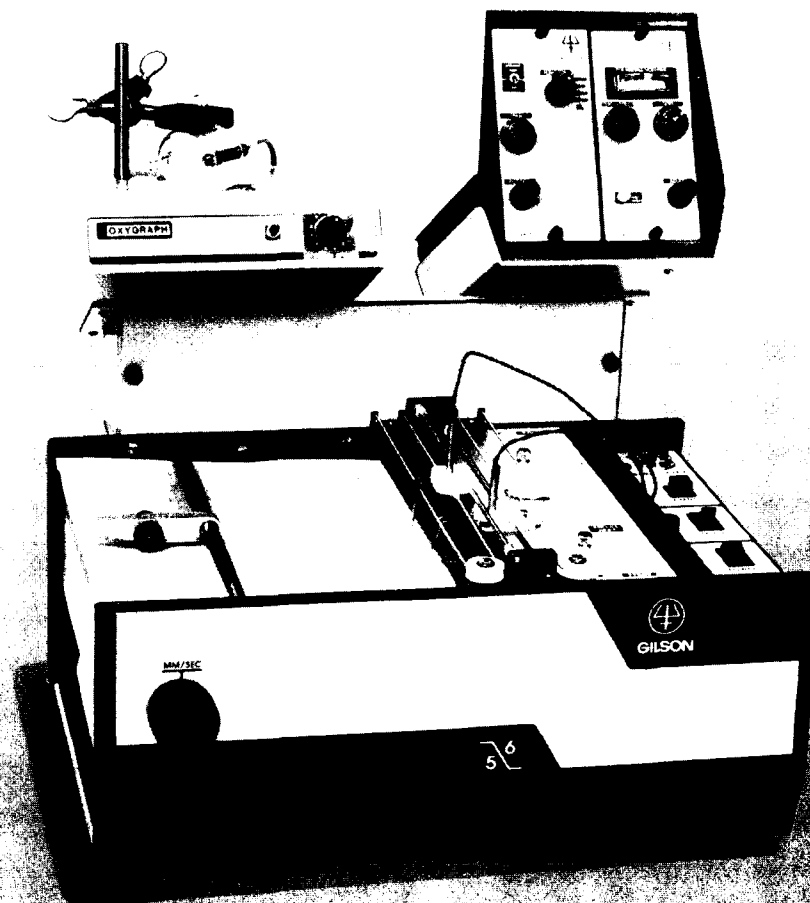
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who should have firsthand knowledge of reasonable estimates of the work they perform are authorized to sign certifications.

Another basis for the objections to the requirements of paragraph J.6 is the volume of paperwork resulting from the personnel activity report. The "reason" given for the selection of that alternative is that there is an apparent prohibition (although nobody has explained why) of the use of the monitored work-load alternative for nonprofessional and nonprofessorial employees, and therefore two systems would be required. This "reason" does not appear to support the selection, since many institutions already have the elements of both alternatives in their nonprofessional and nonprofessorial (nonexempt) payroll systems.

An analysis of the two effort distribution systems prescribed by Circular A-21 indicates few, but important and significant, differences. Briefly, the personnel activity reports "reflect an after-the-fact reporting of the percentage of activity of each employee." Reports for professional and professorial staff are to "be prepared each academic term, but no less frequently than every six months." Each report will be signed to confirm that the distribution of activity represents a reasonable estimate of the work performed during the period.

The monitored work-load system (paragraph J.6c), on the other hand, is "a system of budgeted or assigned work-load . . . incorporated into the official records of the institution . . . because practices vary among institutions and within institutions as to the total activity constituting full workload—when expressed in measurable units, such as contact hours in teaching—the system will be based on a determination for each individual reflecting the ratio of each of the activities which comprises a total workload of the individual. . . . The system will provide for a modification of an individual's salary or salary distribution commensurate with any significant change in the employee workload or the ratio of activities comprising the total workload." Certification of the reasonableness of the distribution will occur at least annually for those employees whose distributions have not changed during the year, while a certification concerning charges up to the date of change will accompany each change notice initiated during the year. Certifications of reasonableness will be signed by the employee or a responsible official having firsthand knowledge of the work.

When one observes the implementa-

tion of the two alternatives at a number of institutions, it is apparent that the monitored work-load alternative is the more desirable for a number of reasons:

1) Many institutions already have a system of budgeted distributions for professional and professorial employees that accounts for 100 percent of their activity, so adoption of the monitored work-load system may merely require a refinement of those existing systems.

2) The monitored work-load system requires a signed statement of reasonableness only annually compared to a requirement of semiannual statements for personnel activity reporting.

3) The monitored work-load system provides a means (usually by the controller function) for the institution to automatically monitor charges that exceed or fall below certain predetermined thresholds established within the system to ensure reasonably accurate distribution.

4) There are few, if any, apparent faculty objections or opposition to the monitored work load.

5) In total, the amount of paperwork generated by the monitored work-load system is considerably less than that which results from the use of personnel activity reports.

Several major institutions (Syracuse University, University of Rochester, University of Oklahoma, University of Michigan) already have implemented monitored work-load systems. Others are in the process of adopting such systems.

In summary, the monitored work-load alternative, which in reality is a payroll budget validation system, focuses the responsibility for both budgeting and validation upon deans, department heads, and other supervisory staff and upon the controller's department. It is, therefore, suggested that institutions consider adopting the monitored work-load alternative in order to meet the requirements of OMB Circular A-21. It appears that something satisfactory exists without insisting on complete elimination of effort reporting.

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*Erratum:* In the news story "A firing over formaldehyde" (News and Comment, 7 August 1981, p. 630), the subheadline attributed to Peter F. Infante (Occupational Safety and Health Administration) the position that formaldehyde is a human carcinogen whereas, in fact, his belief is that it is an animal carcinogen. The story also incorrectly reported that mobile home residents are exposed to levels of formaldehyde as high as 10 parts per million (column one, line 28, p. 631). According to a National Academy of Sciences report, the correct level is 4.2 parts per million.