



May 2, 2013

Office of Management and Budget
725 17th Street NW
Washington DC, 20025
Attn: Office of Federal Financial Management “Grant Reform”
Submitted electronically via www.regulations.gov

Re: AAUW comments on proposed Office of Budget and Management Uniform Guidance;
OMB-2013-0001

Dear Sir/Madam:

On behalf of the more than 150,000 members and supporters of the American Association of University Women (AAUW), I am pleased to share AAUW’s comments on proposed reform of federal policies relating to federal grants and awards.¹ AAUW is committed to “greater availability of and access to benefits and policies that create a family-friendly workplace environment,” which is critical to women’s “equitable access and advancement in employment.”²

In a February 2012 memorandum, President Barack Obama instructed the Office of Management and Budget to “[r]eview and where appropriate revise guidance concerning cost principles, burden minimizations, and audits for State, local, and tribal governments in order to eliminate, to the extent permitted by law, unnecessary, unduly burdensome, duplicative, or low-priority recordkeeping requirements and effectively tie such requirements to achievement of outcomes.”³ In response to the memorandum and request for comments, AAUW urged the Obama administration to amend the federal grant guidelines to notify recipients, particularly universities and research facilities, that these funds could be used toward family leave for participating researchers as necessary.⁴

AAUW strongly supports programs that break through barriers for women and girls in science, technology, engineering, and math (STEM) fields and provide women with education, training, and support for success in the workforce. Helping researchers to balance their responsibilities in the lab with their responsibilities at home will make it easier for women to pursue careers in STEM.

AAUW is pleased that OPM incorporated our suggestion into its proposed policies. In the February 2013 grant guidance, OPM proposes:

- Including “family-related leave” as an employee fringe benefit (page 93)
- Including identification of locally available dependent care as an allowable meeting cost (pages 123-124)
- Including temporary dependent care costs directly resulting from travel to meetings as an allowable travel cost (page 134)⁵

AAUW strongly supports these changes, which will address a central issue that deters many women from pursuing STEM careers: the conflict between particularly demanding professional obligations and personal responsibilities. For example, one study found that one in four female engineers left the engineering profession to devote more time to family responsibilities.⁶ This conflict can drive women away from STEM fields entirely in pursuit of fields perceived as more conducive to work-life balance.

The past 50 years has seen substantial changes in the composition of the American workforce. Approximately two-thirds (64 percent) of women with children under the age of 6 are in the labor force.⁷ Nationwide, 48.9 million individuals provide care for an adult family member or friend, and more than 70 percent of those care recipients are over the age of 50.⁸ Unique solutions are necessary to meet the demands of families and the obligations of work. In these tough economic times, we need to do everything we can to help workers and their families.

Thank you for the opportunity to submit comments on this important issue. I look forward to working with you to promote women's economic opportunities. If you have any questions, please feel free to contact me at 202-785-7720, or Beth Scott, regulatory affairs manager, at 202-728-7617.

Sincerely,



Lisa M. Maatz
Director, Public Policy and Government Relations

¹ *The Federal Register*. (February 1, 2013). *Reform of Federal Policies Relating to Grants and Cooperative Agreements; Cost Principles and Administrative Requirements (Including Single Audit Act)*. Retrieved April 25, 2013, from www.gpo.gov/fdsys/pkg/FR-2013-02-01/pdf/2013-02113.pdf

² AAUW. (June 2011). *2011-13 Biennial Action Priorities*. Retrieved April 25, 2013, from www.aauw.org/resource/principles-and-priorities/

³ *The Federal Register*. (February 28, 2012). *Volume 77, No. 39; Reform of Federal Policies Relating to Grants and Cooperative Agreements; Cost Principles and Administrative Requirements (Including Single Audit Act)*. Retrieved April 26, 2012, from www.gpo.gov/fdsys/pkg/FR-2012-02-28/pdf/2012-4521.pdf

⁴ AAUW. (April 27, 2012). *AAUW Comments on Proposed Grant Reforms*. Retrieved April 25, 2013, from www.aauw.org/files/2013/02/Grant-Reform-comments.pdf

⁵ *The Federal Register*. (February 1, 2013). *Full Text of Proposed OMB Uniform Guidance: Cost Principles, Audit, and Administrative Requirements for Federal Awards*. Retrieved April 25, 2013, from www.regulations.gov/#!documentDetail;D=OMB-2013-0001-0002

⁶ University of Milwaukee. (March 2011). *UWM Study: Work Climate Discourages Women Engineers*. Retrieved September 26, 2011, from www4.uwm.edu/news/stories/details.cfm?customel_datapageid_11602=3967127

⁷ U.S. Bureau of Labor Statistics. (March 26, 2013). *Women in the Labor Force: A Databook*. Retrieved April 25, 2013, from www.bls.gov/cps/wlf-databook-2012.pdf

⁸ National Alliance for Caregiving and AARP. (2009) *Executive Summary. Caregiving in the U.S.: Findings From the National Caregiver Survey*. Retrieved February 22, 2011, from www.caregiving.org/data/CaregivingUSAllAgesExecSum.pdf