

## CURRENT COGR PRIORITIES - BY COMMITTEE (7/10/17)

No.	Date Added	Lead Committee	Cross Cutting	Issue	Description	Priority	Status	Non-Federal External Partners	Agency Partners	Resources	Last Update
1		Costing		Student Financial Aid and "Securing Student Information" and Compliance Supplement	New single audit requirement. Delayed until 2018.	MEDIUM	Pending	Edu cause, NACUBO, NASFAA, AICPA, and NASACT	OMB, Dept. of Ed.		7/8/2017
2	2/2/2017	Costing	RCA, RRR	HHS Policy Office engagement and advocating for changes to Grant Closeout policies.	Prior collaboration with 120-day close-out, Closeout report, encourage all OpDivs to join RTCs. Recent outreach to new HHS POC	MEDIUM	Pending		HHS		7/8/2017
3	7/8/2017	Costing		NIH Notice NOT-OD-17-074; reminds recipients to submit timely closeouts.	The Notice may be a precursor to more active enforcement of timely closeouts.	MEDIUM	Pending				7/8/2017
4		Costing	RRR	OMB Letter to Reduce Administrative Burden	OMB request (in coordination with procurement issue) to provide actions to reduce burden	LOW	Complete		OMB		7/8/2017
5	7/8/2017	Costing		Procurement Standards (2 CFR 200.317-326) implementation, including MicroPurchaseThreshold (MPT).	Most schools will have to implement 7/1/2018 (some 9/1/2018). MPT guidance (NDAA) may not be available, which will create uncertainty.	HIGH	Active	AIRI			7/8/2017
6	2/2/2017	Costing	CIP, RRR	Work with Foundations to address low F&A rates.	In light of proposed NIH 10% cap, and Foundations cited by Members of Congress, sense of urgency to better partner with the Foundations.	HIGH	Active	Milken Institute, Faster Cures			7/8/2017
7	7/8/2017	Costing	RRR	F&A and proposed NIH 10% cap. Possibly other agencies, too?	Even if Trump budget is rejected, unilateral action by HHS/OMB is possible.	HIGH	Active	AAU, APLU, AAMC, AIRI, NACUBO			7/8/2017

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8	2/2/2017	Costing	RCA, CIP, RRR	Uniform Guidance, 2 CFR Part 200, revisions.	We were awaiting release of Fed Register (FR) Notice and a separate release of FAQs. However, per OMB, this initiative is no longer active.	LOW	Pending				7/8/2017
9	7/8/2017	Costing		COFAR is disbanded.	Could this impact status of COFAR / UG FAQs? Consensus is "No", since these have been memorialized in the RTC, the Compliance Supplement, and possibly on the CFOC website.	MEDIUM	Active				7/8/2017
10	2/2/2017	Costing		F&A Survey	Final reports, negotiation experiences, and Exec Summary	LOW	Complete				7/8/2017
11	2/2/2017	Costing		Off Campus Research Centers / Lease Costs	Request to NIH to modify "direct cost maximum" to exclude lease costs, so as not to unfairly penalize off campus research centers. Considering "SPECIAL NOTES" per the F&A rate agreement solution	MEDIUM	Active				7/8/2017
12	2/2/2017	Costing		HHS-CAS 2017 Best Practices Manual	Internal Guidance for CAS rate negotiators to review F&A rate proposals.	MEDIUM	Complete		HHS		7/8/2017
13	2/2/2017	Costing		CAS Interpretation of Software Capital Threshold per the UG	CAS is using a strict \$5,000 for all flavors of software purchased with federal funds.	MEDIUM	Pending				7/8/2017
14	2/2/2017	Costing		F&A concerns (CAS): DS-2, UCA, On-Off definition per F&A rate agreement	Requires HHS-CAS and/or OMB engagement. With OMB currently disengaged in UG issues, some of these issues are tabled, for now.	MEDIUM	Pending				7/8/2017
15	2/2/2017	Costing		F&A concerns (ONR): Interest expense, 4 year extensions	Issues that required ONR and/or OMB engagement	LOW	Complete				7/8/2017

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16	2/2/2017	Costing		Student Financial Aid and Dept of Ed. Requirement for Annual Audit (Compliance Supplement)	Dept. of Education may require an annual audit of the SFA Cluster, though UG and other guidance does not support.	MEDIUM	Active	NASACT, NACUBO, AICPA			7/8/2017
17	2/2/2017	Costing		Interpretation of "Reimbursement" and "Advance Payment" (Compliance Supplement)	Single auditors, under pressure from IGs, are starting to require "cancelled checks" as documentation showing "Advance billing" was not done.	HIGH	Active				7/8/2017
18	7/8/2017	Costing		Active engagement in commenting on the 2018 Compliance Supplement.	"Reimbursement" an "Advance Payment" issue is the most significant concern and possibly could be addressed in the 2018 CS.	HIGH	Active				7/8/2017
19	7/8/2017	Costing	CIP	Cost of Data/IT enterprise.	Follow up to Thursday AM session at 6/8/17 COGR meeting and further engagement in related costing issues.	MEDIUM	Active				7/8/2017
20	7/8/2017	Costing		Restriction in Health Coverage Benefits; NIH, DOL, other agencies	Federal funds cannot be used for abortions. Longstanding policy, but new concern on how we demonstrate compliance. Our internal policies provide the needed documentation, but risk assessment may still be appropriate.	LOW	Complete				7/8/2017
21	7/8/2017	Costing		NSF IG memo to OMB covering "observations" on the FDP payroll certification pilots.	NSF IG cited monthly/bi-monthly reconciliations and full allocations for PI salaries.	MEDIUM	Complete				7/8/2017

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22	2/2/2017	CIP		Dept. of Ed. open licensing requirement (82 FR 7376; 1/19/17)	Requires open licensing to the public of grant deliverables created with Department of Ed. competitive grant funds.	HIGH	Active				7/7/2017
23	2/2/2017	CIP		Proposed Revised Bayh-Dole Regulations (81 FR 78090; 11/7/2016)	Revises 37 CFR 401 Bayh-Dole implementing regulations. 10 concerns with rule identified in joint association 12/9 comment letter.	HIGH.	Stalled	AUTM, AAU, APLU, AAMC			2/2/2017
24	2/2/2017	CIP		Invention reporting	Increasingly visible compliance issue with escalating concerns about drug pricing. Recent march-in and Congressional requests to NIH have heightened the concerns. Significant resource implications with increased investments in compliance training and reporting.	HIGH	Active	AUTM (NIH/NIST)	NIH, NIST		6/22/2017
25	2/2/2017	CIP	RCA	Controlled unclassified information (CUI)	Development of new FAR clause to meet NARA/NIST requirements. Will heavily impact contracting and compliance staff at COGR member institutions.	HIGH	Pending	FDP	NARA		6/22/2017
26	2/2/2017	CIP		Patent Reform	Anticipated legislative attempts to address issues associated with patent trolls. Major potential impact on university patenting and licensing.	Medium	Active	AAU, APLU, AAMC, AUTM			6/22/2017
27	2/2/2017	CIP		Export controls	Final ITAR revised definitions still pending. Would become high if issued with changes proposed in June, 2015	Medium	Awaiting Federal Response	AAU, AUECO	Commerce, State		6/22/2017

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28	2/2/2017	CIP		Cybersecurity	FAR and DFARS requirements issued in 2016. May be superseded by NARA FAR clause.	MEDIUM	Active	AAU	DOD		6/22/2017
29	2/2/2017	CIP	RRR	IP Rights in NIH PMI Initiative	NIH use of Other Transactions authority, with government ownership of inventions	LOW	Inactive	AAU/AAMC	NIH		6/22/2017
30	2/2/2017	CIP		Technology Transfer Evolution	Fundamental shifts in roles and responsibilities of tech transfer offices - but no particular time frame.	HIGH	Active	AAU/APLU/AUTM			6/22/2017
31	2/2/2017	RCA	Costing	Public Access	RCA focus on storage/data types/compliance with agency PA Plans, with Costing to accumulate data and understand cost impacts	MEDIUM	Active	AAU/APLU			4/27/2017
32	2/2/2017	RCA		Research Terms/National Policy Matrices	Promote uniformity and adopt RTCs across all federal agencies; address any implementation issues that arise as new RTCs are adopted	HIGH	Pending				4/27/2017
33	2/2/2017	RCA		Dual Use Research of Concern	NAS held DURC workshop on 1/4/17. Awaiting committee report that assesses the various options presented in the commissioned papers and discussed during the workshop.	LOW	Pending				4/27/2017
34	2/1/2017	RCA		FLSA Overtime Rule	Monitor status to determine administration's next steps on adoption of these requirements	LOW	Pending	ACE, CUPA-HR			4/27/2017
35	2/2/2017	RCA	RRR, Costing, CIP	DoD Research Terms and Conditions	RCA responded to first series of six (6) NPRMs on 2/6/17.	MEDIUM	Pending				6/29/2017
36	2/2/2017	RCA	Costing	Subrecipient Monitoring	RCA to continue to work on issues related to subrecipient monitoring - continue to advance concept of safe harbor, clarify rules around former subrecipients, address standardized subrecipient monitoring, including foreign subrecipient monitoring.	HIGH	Active	FDP			4/27/2017

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37	2/2/2017	RCA		Fixed Price Subawards	Clarified in March 2017 NIH requirements for prior approval for fixed price sub awards; remaining issues are monitoring burden of acquiring approvals and (with FDP) investigating mechanisms to expedite approval) such as template documents	MEDIUM	Active	FDP			6/29/2017
38	2/3/2017	RRR		Human Subjects Protections - Common Rule	Anticipate additional related publications including revised subparts; privacy and security guidance; guidance on identifiable biospecimens and identifiable private information and techniques that might render them identifiable; a revised list of research eligible for expedited review; and a possible exempt decision tool.	HIGH	Active	AAMC, AAU and APLU.			6/6/2017
39	2/3/2017	RRR	Costing (costing aspects)	NIH Single IRB Policy	Addressing the scope and timing of the rule. Identifying specific categories of research (i.e., areas of social and behavioral research) that should/could be exempt from sIRB requirements. Make the case to NIH for categories for exemption rather than case-by-case exemption. Costing focus is to ensure NIH guidance is clear on allowable costing methodologies. Evaluating the effectiveness of the policy via the assessment developed by RRR.	HIGH	Active	AAMC, AAU, APLU			6/6/2017
40	2/3/2017	RRR		Engaging the new administration to advance regulatory reform efforts and congressional staff as needed.	Organizing meetings with new leadership at OIRA, OMB, HHS and OSTP.	HIGH	Active	AAU and APLU			6/6/2017

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41	2/3/2017	RRR	RCA, Costing, CIP as applicable	Facilitating the implementation of recent regulatory reform legislation including 21 <sup>st</sup> Century Cures and the American Innovation and Competitiveness Act.	Varies by provision. *See accompanying spreadsheet.	HIGH	Active	AAU, AAMC, FASEB, FDP, APLU, AIRI			6/6/2017
42		RRR		Reducing institutional administrative burden via the COGR checklist.	Further analysis and next steps	MEDIUM		FASEB, AAMC			6/6/2017
43		RRR		ClinicalTrials.gov	Improving the interface and reducing administrative work. Potential to seek regulatory change.	HIGH	Active	AAU, APLU and AAMC			6/6/2017
44	2/3/2017	RRR		Accreditation of Human Research Protection Programs	Reducing the level of administrative work associated with the accreditation and re-accreditation process.	MEDIUM	Active				6/6/2017

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45	2/3/2017	RRR	Costing	Office of Inspectors General audits.	Continue to address and make members aware of OIG audits and reports. Consider a discussion on how to make more effective use of the Single Audit and reduce the number and duration of OIG audits.	MEDIUM	Active				6/6/2017
46	2/3/2017	RRR		Data Act	Section 5 pilot. Efforts to reduce administrative burden.	LOW	Active	FDP			6/6/2017
47	2/3/2017	RRR		NSF Intergovernmental Personnel Act Program	OIG audits and 2017 pilot.	LOW	Active	AAU			6/6/2017
48	2/3/2017	RRR	Costing	R35 Solicitations	Continue to address inconsistencies in NIH solicitations with the Uniform Guidance and university processes and systems.	MEDIUM	Inactive				6/6/2017
49	4/23/2017	RRR		Animal Research Regulatory Reform	Provide NIH, USDA and FDA with actionable recommendations for improving animal welfare and science while reducing regulatory burden associated with federally funded animal research in anticipation of a review that agencies are directed to conduct by the 21st Century Cures Act.	HIGH	Active				6/6/2017
50	6/6/2017	RRR	RCA	Grant Support Index (GSI)/Biomedical Enterprise	Efforts to stabilize the biomedical enterprise, including limiting the number of grants that an individual investigator can have.	HIGH	Active				6/6/2017