

COGR Forum III Adapting to Change: Policy Shifts & Research Impact

July 23, 2025



Naomi Schrag, *Vice President
for Research Compliance,
Training, and Policy
(Columbia University) and
COGR Board Chair*



Matt Owens, *President (COGR)*

COGR
Advancing Effective Research Policy

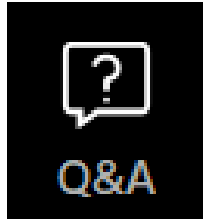
Today's Agenda:

- **Current Issues Briefing**, including latest developments & legal updates, Defend the Spend, NIH Updates, and Gold Standard Science
- **Issues Forum:** Topics & Questions from the Membership
- **COGR Discussion of the FAIR Model & Future of Indirect Cost Reimbursement** (w/QA)
- **Closing Remarks & Reminders**

COGR Forum III: Multiple Ways to Engage



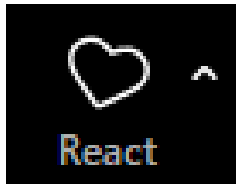
Q&A: Use the QA function (bottom center) to ask questions. Do not use the chat window to ask questions of the panelists.



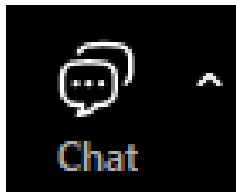
Ask questions via the QA Function (bottom center). **Back for this Forum: Upvote and comment on other attendees' questions.**



Back for this Forum: Step Up to the Mic! Use the “Raise Hand” function if you would prefer to speak your question or comment. Zoom will ask you to unmute prior to speaking.



Hear something you like? (or don't?) Use the React feature at anytime to show the panelists and fellow attendees how you're feeling.



Use the chat window to talk with other attendees and alert the moderators to any technical issues. Feel free to utilize the chat for making comments, doing a quick 'benchmark' of your fellow attendees, etc.

This session is not being recorded.

COGR

Chatham House Rules – *“Attendees are free to use the information they received, but neither the identity nor the affiliation of the speaker(s), not that of any participant, may be revealed.”*

COGR Forum II: Adapting to Change: Policy Shifts & Research Impact

July 23, 2025

COGR Committee Chairs:



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*Executive Director,
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Compliance (REC) Chair*



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COGR Forum III: Adapting to Change: Policy Shifts & Research Impact

July 23, 2025

COGR Committee Directors:



Cindy Hope, *Director,
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Krystal Touns,
*Director, Contracts &
Grants Administration
(CGA)*



Kris West, *Director,
Research Ethics &
Compliance (REC)*



Kevin Wozniak,
*Director, Research
Security & Intellectual
Property (RSIP)*

Moderator:



Matt Owens, *President (COGR)*



Current Issues Briefing

Issues Forum

COGR Discussion of the FAIR Model & Future of Indirect Cost Reimbursement

FAIR Model - Structure

Three overarching categories for expenses:

- 1. Research Performance Costs (RPC) – Expenses classified currently as direct costs.**
- 2. Essential Research Performance Support (ERPS) – Expenses generally classified currently as indirect costs but that could, absent current restrictions, be allocated directly to awards.**
- 3. General Research Operations (GRO) – Expenses generally classified currently as indirect costs and that continue to be impractical to allocate directly to awards. (flat 15% TC)**

FAIR Model – Basic or Expanded

Difference - Essential Research Performance Support (ERPS)

- Regulatory Compliance (RC)
- Award Monitoring, Oversight and Reporting (AMOR)
- Research Information Services (RIS)
- Essential Research Performance Facilities (ERPF)

Option to Calculate Charge for Basic and Expanded

Option to Calculate Charge for Expanded Only

- Basic = 10% TC

FAIR Model – But How?

Cost Category	Basic	Expanded
RPC	\$A	\$A
ERPS – RC	\$B	\$B
ERPS – AMOR	\$C	\$C
ERPS – RIS	10% TC	\$D
ERPS – ERPF		E%
GRO	15% TC	15% TC
Total Cost (TC)	$(A+B+C)/75\%$	$(A+B+C+D)/(1-E\%-15\%)$

Budgeting Requires A Little Algebra

FAIR Model – But How?

Cost Category	Basic	Expanded
RPC	\$100,000	\$100,000
ERPS – RC	\$2,000	\$2,000
ERPS – AMOR	\$3,000	\$3,000
ERPS – RIS	10% TC	\$1,000
ERPS – ERPF		12% TC
GRO	15% TC	15% TC
Total Cost (TC)	$(\$105,000)/75\% = \$140,000$	$(\$106,000)/(73\%) = \$145,205$

Budgeting Requires A Little Algebra

FAIR Model – But How?

Research Performance Costs (RPC)	Ref	Basic Option		Expanded Option	
		\$	Value Derived From	\$	Value Derived From
Senior Key Personnel	<i>a</i>	200,000	User Input	200,000	User Input
Other Personnel	<i>b</i>	150,000	User Input	150,000	User Input
Equipment	<i>c</i>	7,500	User Input	7,500	User Input
Travel	<i>d</i>	3,000	User Input	3,000	User Input
Participant/Trainee Costs	<i>e</i>	15,000	User Input	15,000	User Input
Supplies	<i>f</i>	10,000	User Input	10,000	User Input
Research Recharge Resources and Services	<i>g</i>	40,000	User Input	40,000	User Input
Essential Research Performance Support (ERPS) Costs					
Regulatory Costs				-	
Biosafety	<i>h</i>	2,000	User Input	2,000	User Input
Research Data Management	<i>i</i>	1,800	User Input	1,800	User Input
Award Monitoring, Oversight, and Reporting (AMOR)	<i>j</i>	250	User Input	250	User Input
Research Information Services (RIS)	<i>k</i>			150	User Input
Essential Research Performance Facilities (ERPF)	<i>l</i>	57,273	Calculated 10% of total award	74,086	Calculated ERPF type % of total award
General Research Operations (GRO) Costs	<i>m</i>	85,910	Calculated 15% of total award	88,903	Calculated 15% of total award
Total Award	<i>n</i>	572,733	Sum total of "a" through "m"	592,690	Sum total of "a" through "m"

But there will be a tool for the math.

FAIR Model - Structure

To receive ERPS > 10% Total Cost

- Recharge Centers* for Research Compliance, Award Monitoring and/or Research Information Services
 - *Is there another method for more precisely allocating?
 - More precise cost allocation, but challenging
- Space Survey or other reasonable method required for facilities related costs
 - Current Simplified Method in 2 CFR 200 Appendix III?

FAIR Model - Application

Institution Changes Required:

- **Systems**
- **Policies and procedures**
- **Accounting and budgeting (sponsored and non-sponsored)**
- **Culture**
- **Proposal and award oversight**
- **Audit environment, requirements, process, and cost**

Federal Agency Changes – Innumerable?

FAIR Model – Impact and Considerations

- **Basic or Expanded?**
 - **Considerations for Institutions with a smaller federal research portfolio (e.g. S&W or higher admin cost)**
- **Facility Types and Current Cost Pool Comparisons**
- **Shifting subsidy for indirect recovery from institutions to fed.**
- **Impact to PI Direct Funds**
- **Impact to preparing proposal budgets**

Closing Thoughts

- Micro vs Macro impact on research funding
- It is just a model
 - Non-negotiables are TBD
- JAG continuing to receive feedback from community and from administration
- Technical ideas, questions, etc. to JAG,
<https://linktr.ee/JAGTownHall> and chope@cogr.edu!



Feedback on the Financial Accountability in Research
(FAIR) Model



A top-down view of a wooden desk. In the upper right, a portion of a white computer keyboard is visible, showing keys for '00', '3', '+', '-', and '='. To the left of the keyboard is a yellow paperclip. In the center, three sticky notes are arranged to spell 'Q&A': a pink note with a large black 'Q', a light green note with a large black '&', and another pink note with a large black 'A'. A silver pen lies diagonally in the lower right corner. The background features a dark blue geometric pattern.

Q

&

A

Upcoming COGR Events



**Register Here for
Upcoming Events**



August 19: Costing & Financial Compliance Committee Virtual Open House

Registration Now Open



August 2025: COGR Forum IV:

Registration will open soon



September 2025: COGR Forum V

Registration will open soon



October 23-24, 2025: COGR Meeting in Washington D.C.

Registration is now open, early bird pricing through 9/5

Click the QR code or visit www.cogr.edu and “Meetings”

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