



Council On Governmental Relations

An Association of Research Institutions

December 18, 2019

Mr. Paul Ray
Acting Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget

Sent electronically: Paul_Ray@omb.eop.gov

Dear Mr. Ray,

The Council on Governmental Relations is an association of 187 research universities and affiliated academic medical centers and research institutes. COGR concerns itself with the impact of federal regulations, policies and practices on the performance of research conducted at our member institutions.

We are very concerned about the Department of Education's request for emergency review of the new proposed Information Collection Request (ICR) on Foreign Gifts and Contracts Disclosures published in the Federal Register by the Department on December 17, 2019, [Docket No. ED-2019-ICCD-0154](#). The effect is to shorten the normal comment period from 30 to 10 days. This adversely affects our ability to provide meaningful comments to the Department, especially given the timing over a holiday period when federal offices and many universities will be closed.

We also agree with the comments submitted by the American Council on Education and other groups on December 17 which discuss why the Department's request fails to meet the criteria for emergency review. Given these issues we strongly urge OMB not to approve the Department's expedited review request.

Sincerely,

A handwritten signature in blue ink that reads "Wendy D. Streit". The signature is fluid and cursive, with the first and last names being the most prominent.

Wendy D. Streit
President

Electronic copy sent to:
Shelley L. Thompson, OMB
Alexander T. Hunt, OMB
Kelvin Droegemeier, OSTP
Lisa Nichols, OSTP
Stephanie Valentine, DoEd