



February 21, 2023

Ms. Deidre A. Harrison
Acting Controller, Office of Federal Financial Management
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Mr. Steven Mackey
Policy Analyst at the OMB Office of Federal Financial Management
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*Re: 30-day Extension Request for Responses to Federal Register Notice, 88 FR 8480
2 CFR Chapter 1, Parts 25, 170, 175, 176, 180, 182, and 183
2 CFR Chapter 2, Part 200*

Sent via electronic and submitted at Regulations.gov

Dear Ms. Harrison and Mr. Mackey,

The Association of American Medical Colleges (AAMC), Association of American Universities (AAU), Association of Independent Research Institutes (AIRI), Association of Public and Land-grant Universities (APLU), Association of Research Libraries (ARL), Council on Governmental Relations (COGR), and National Association of College and University Business Officers (NACUBO), collectively the “Associations,” appreciate the opportunity to respond to OMB’s Request for Information (RFI) regarding 2 CFR 200, chapters 1 and 2. This is an important initiative being led by OMB’s Office of Federal Financial Management and has the potential to make a significant contribution to the quality and effectiveness of the research environment.

Our associations are enthusiastic about addressing issues that will result in a reduction of administrative burden. However, with the short 30-day response timeline, we are concerned this will restrict our ability to provide the most robust and potentially beneficial response. ***Consequently, we are requesting a 30-day extension—from March 13 to April 12.*** Our longstanding and productive partnership always has been premised on serving the grantee community first. While we understand the sense of urgency OMB has to finalize the revisions, experience, precedent tells us that a 30-day extension will allow for more thorough and thoughtful comments, will add value to the response to the RFI, and allow for more productive coordination across the higher education community (and ultimately less work for OMB as you sift through responses from a large and diverse group of stakeholders).

Thank you for your leadership in advancing these issues, which are of the highest priority for the research community. We look forward to working with OMB on this important project.

Sincerely,

Association of American Medical Colleges (AAMC)

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Association of American Universities (AAU)

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Association of Independent Research Institutes (AIRI)

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Association of Public and Land-grant Universities (APLU)

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Association of Research Libraries (ARL)

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Council on Governmental Relations (COGR)

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National Association of College and University Business Officers (NACUBO)

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The Council on Governmental Relations (COGR) is an association of over 200 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 its member institutions. The AAMC (Association of American Medical Colleges) is a nonprofit association dedicated to transforming health through medical education, health care, medical research, and community collaborations. Its members are all 155 accredited U.S. and 17 accredited Canadian medical schools; approximately 400 teaching hospitals and health systems, including Department of Veterans Affairs medical centers; and more than 70 academic societies. The Association of American Universities (AAU) is an association of 63 U.S. and two Canadian leading research universities that transform lives through education, research, and innovation. AAU member universities collectively help shape policy for higher education, science, and innovation; promote best practices in undergraduate and graduate education and strengthen the contributions of leading research universities to American society. The Association of Independent Research Institutes (AIRI) is an association of not-for-profit biomedical and behavioral research institutes whose mission is to enhance the ability of its members to improve human health and advance knowledge. We accomplish our mission through member networking, education, and involvement in the development of science policy. The Association of Public and Land-grant Universities (APLU) is a research, policy, and advocacy organization with a membership of over 240 public research universities, land-grant institutions, state university systems, and affiliated organizations in the U.S., Canada, and Mexico, that is dedicated to strengthening and advancing the work of public universities. The Association of Research Libraries (ARL) is a nonprofit organization of 126 research libraries in Canada and the US whose mission is to advance research, learning, and scholarly communication. The Association fosters the open exchange of ideas and expertise; advances diversity, equity, and inclusion; and pursues advocacy and public policy efforts that reflect the values of the library, scholarly, and higher education communities. The National Association of College and University Business Officers (NACUBO) represents more than 2,100 colleges, universities, and higher education providers. NACUBO's mission is to advance the economic viability and business practices of higher education institutions, including in the information technology (IT) space, to support the fulfillment of their academic missions.