

# Considerations around Cloud Computing

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**COGR**

Council On Governmental Relations

*An association of research institutions*

# Cloud Workgroup

Sarah Axelrod, Harvard

Mike Daniels, Northwestern

Steven Gill, Princeton

Joe Gindhart, Washington U

Cindy Hope Georgia Tech

Bill Lambert, Emory

Jeffrey Silber, Cornell

Toni Russo, COGR

David Kennedy, COGR

# A solution in search of a problem?



# Quick History

- 1) **2006:** Amazon created AWS subsidiary and introduced Elastic Compute Cloud, an early major commercial service.
- 2) **2015:** Kelvin Droegemeier, then on the COGR Board and National Science Board, and Randy Bryant, then at OSTP, presented on “F&A and Cloud Computing”  
  
First known university policy waiving F&A on “Storage, Compute and Cloud Services
- 3) **2016:** Report from an NSF-supported workshop entitled “Cloud Forward” issued, identifying indirect cost considerations as one factor to be explored.
- 4) **2018-2020:** Evidence of program announcements (e.g., NSF) restricting F&A on cloud computing expenditures

# Approach and Issues

- 1) Definitions and Background
- 2) Defining the F&A Problem, Treatment in MTDC Base  
*(Analogous to 2010 NIH NOT-OD-10-097, Budgeting for Genomic Arrays???)*
- 3) Perceived or Real Inequity
- 4) Risk of Perverse Incentives
- 5) External Vendors
- 6) Providing as an Internal Service
- 7) Accounting System Challenges
- 8) Internal Policies on F&A
- 9) F&A Rate Agreement Repercussions
- 10) Survey Results

# Survey

- 1) Institutional policy? (e.g., waive, case-by-case, etc.)
- 2) Primary vendors?
- 3) Do you have a GL/accounting code in your system?
- 4) Annual Total and Fed expenditures on vendors?
- 5) Do you provide through internal IT services?
  - If yes, recharge center for these services?
  - If yes to recharge, do you apply F&A to the recharge?
- 6) If possible, rough split between external and internal provider for cloud services?

# Final Thoughts

- 1) A “Considerations” paper, rather than a “Recommendations” paper
- 2) Any advocacy, beyond the paper, will depend on responses from members, sense of urgency, etc.
  - 1) Timing for release will be in the Spring
  - 2) We’d love input!

Questions?

Comments?

Concerns?