COGR Committee Reports & Hot Topics

June 6, 2025

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Transition Impact Survey, Part II: Preliminary Results

June 6, 2025

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Survey Demographics

Transition Impact Survey, Phase II
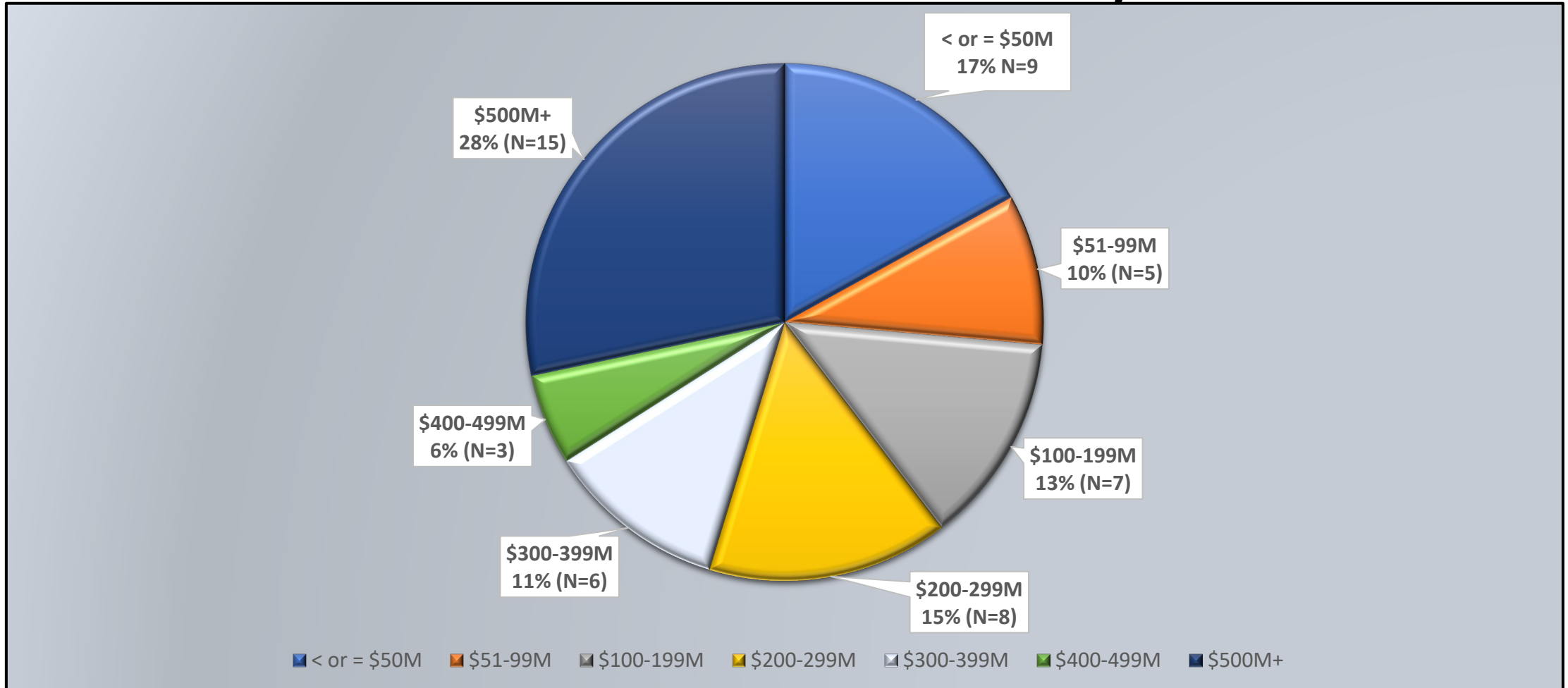
Preliminary Results

Number & Type of Responders for the Period May 20, 2025, to June 2, 2025

- **No. of Complete Responses**: 53

- **Types of Institutions that Responded**:
  - Public – 66% (N=35)
  - Private – 25% (N=13)
  - Affiliated Medical School – 26% (N=14)

- **Institutional Location**:
  - Northeast – 28% (N=15)
  - Southeast – 23% (N=12)
  - Midwest – 19% (N=10)
  - West – 21% (N=11)
  - Southwest – 9% (N=5)

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Responders' Annual Federal R&D Expenditures Per 2023 NSF HERD Survey

< or = $50M
17% N=9

$500M+
28% (N=15)

$51-99M
10% (N=5)

$100-199M
13% (N=7)

$400-499M
6% (N=3)

$300-399M
11% (N=6)

$200-299M
15% (N=8)

■ < or = $50M   ■ $51-99M   ■ $100-199M   ■ $200-299M   ■ $300-399M   ■ $400-499M   ■ $500M+

Key Survey Themes

Transition Impact Survey, Phase II

Preliminary Results

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Since Jan. 20, 2025, Nearly ALL Responders Received Time-Consuming Agency Request for Additional Information re. Payment Requests

96% of responders reported receiving a request from one or more federal agencies to provide additional information for a payment request on a grant or contract.
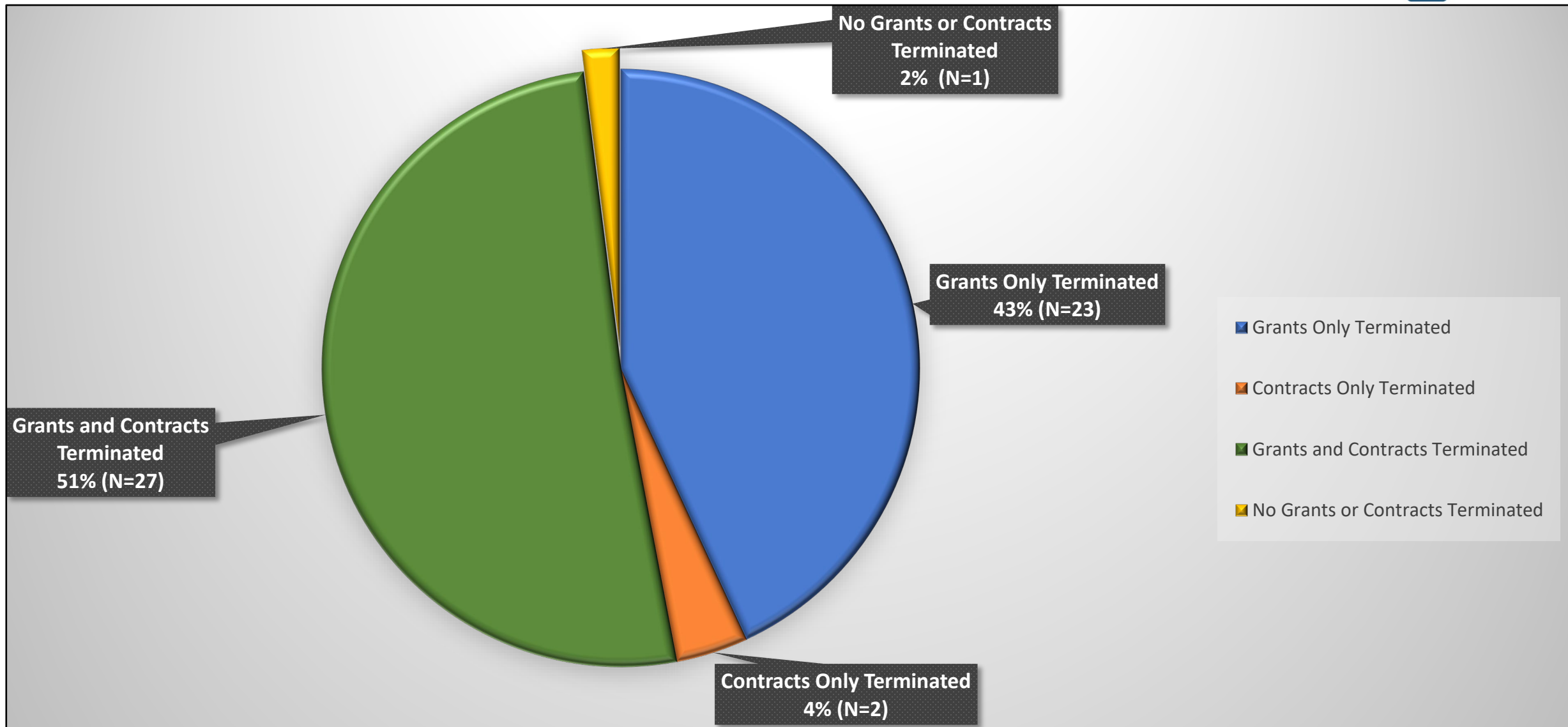
79% of responders reported a payment was paused/rejected/not reimbursed "due to insufficient detailed justification" for payment.

Over ⅓ of responders reported spending **more than 45 hours responding to such requests** and over ¼ spent between 15-45 hours in responding.
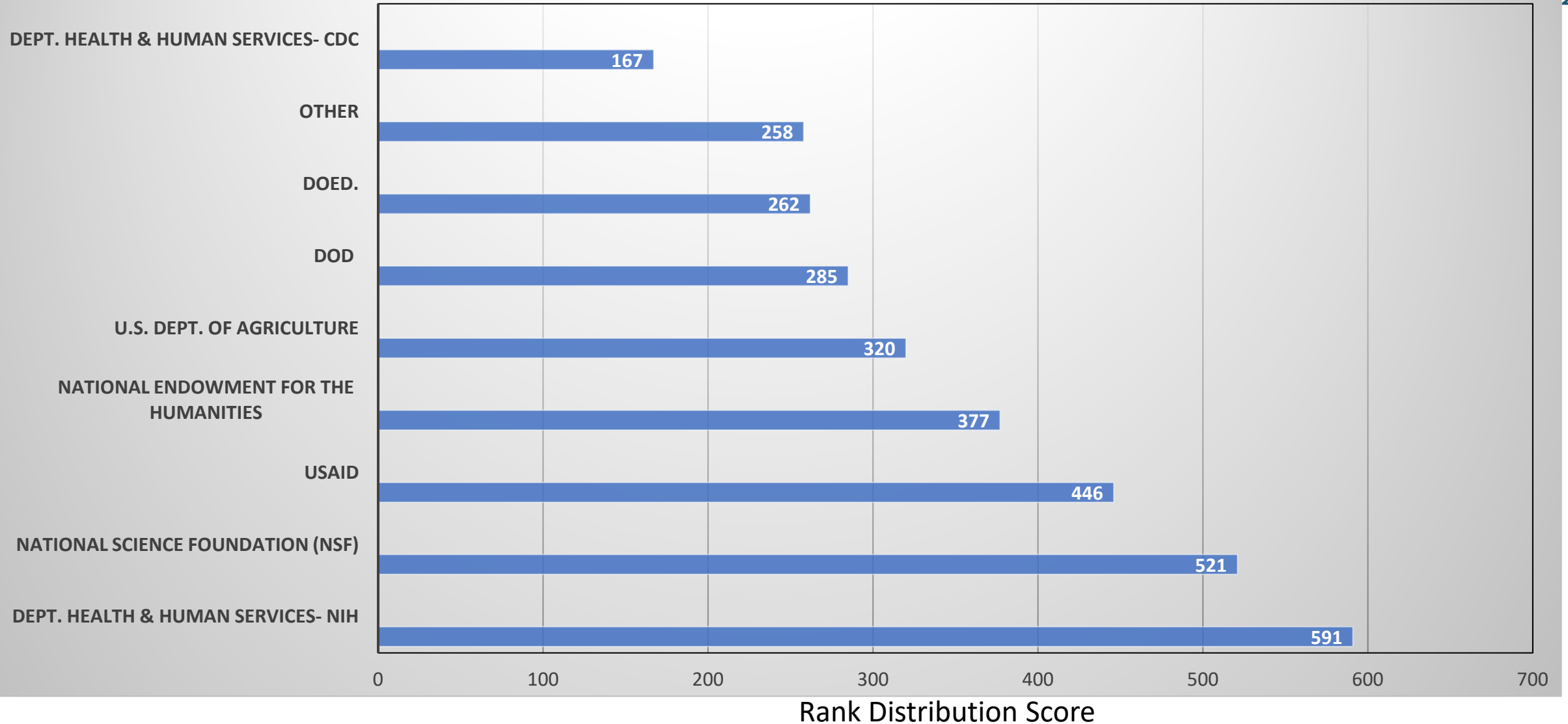
Poll Everywhere Pollev.com/cogrstaff949 Ask a question from your seat!

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Virtually All Responders Had Grants and/or Contracts Terminated by the Government for Convenience

No Grants or Contracts Terminated
2% (N=1)

Grants Only Terminated
43% (N=23)

Grants and Contracts Terminated
51% (N=27)

Contracts Only Terminated
4% (N=2)

Legend:
- Grants Only Terminated
- Contracts Only Terminated
- Grants and Contracts Terminated
- No Grants or Contracts Terminated

84% of Responders Appealed/Objected to/Sought Waivers for Terminations

No. of Appeals of Terminated Grants/Contracts

- 54% (N=27) of responders appealing 0-40% of terminations
- 46% (N=20) appealing 41-100% of terminations

Top 3 Agencies Where Appeals were/will be Filed

- HHS-NIH
- NSF
- NEH

Top Appeals Strategies

- 84% (N=36) - Providing justification for how award supports agency priorities
- 72% (N=31) - Challenging applicability of award term/termination
- 61% (N=26) - Eliminating problematic key words or elements

Poll Everywhere Pollev.com/cogrstaff949 Ask a question from your seat!

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15% Indirect Cost Rate: 66% of Responders Report Rate Reduction will Impact Engagement in Federally Funded Research

Anticipated Impacts:

- Increased efforts to seek other sources of funding – 80% (N=40)

- Reduction in federal research portfolio – 78% (N=39)

- Reduction in administrative support for researchers – 78% (N=39)

- Reductions in workforce – 76% (N=38)

- Reduction in facilities/infrastructure allotted to research – 70% (N=35)

- Reduction in post-docs – 64% (N=32)

- Reduction in graduate students – 60% (N=30)

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Impacts of Terminations, Rate Reductions, and Other Recent Federal Research Funding Changes are Substantial

- 42% (N=21) of responders have implemented or planned to implement RIFS

- 32% (N=10) of responders noted "Other" Impacts:
  - Program and project terminations
  - Operational budget reductions/hiring freezes/travel restrictions
  - Fewer graduate students

- 19% (N=6) of responders reduced number of post-docs

- 19% (N=6) of responders reduced number of significant research programs

- 16% (N=5) of responders reduced number of graduate students

- 13% (N=4) of responders discontinued significant studies

More Detailed Data on Impacts

Transition Impact Survey, Phase II

Preliminary Results

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Financial Impact of Grant/Contract Terminations

# of Grants and/or Contracts Involved	Balance Remaining on Terminated Contracts	Top 5 Terminating Agencies	Top Reasons for Termination (check all that apply)
1-5: **14%** (7 responders)	$50 -250K: **2%** (1 responder)	**HHS - NIH**	Doesn't align with agency priorities **98%** (50 responders)
6-10: **12%** (6 responders)	$251 – 500K: **6%** (3 responders)	**NSF**	DEI/DEIA/GI **71%** (36 responders)
11-20: **22%** (11 responders)	$501-999K: **2%** (1 responder)	**USAID**	EOs Generally **55%** (28 responders)
21-50: **26%** (13 responders)	$1 – 5M: **36%** (18 responders)	**NEH**	Foreign Aid: **48%** (24 responders)
50+: **28%** (14 responders)	>$5M: **54%** (28 responders)	**USDA**	Covid-19 Funds: **41%** (20 responders)

62% of responders (N = 31) USED institutional funds to continue the research supported by the terminated contracts

IMPACT OF CONTRACT/GRANT TERMINATIONS ON PERSONNEL			
# Persons	PIs & Co-PIs	Students & Post-docs	Other Employees Directly Paid by Award
1-5	14% (N=7)	14% (N=6)	21% (N=9)
6-10	12% (N=6)	19% (N=8)	12% (N=5)
11-20	22% (N=11)	21% (N=9)	16% (N=7)
21-50	20% (N=10)	19% (N=8)	19% (N=8)
50+	**32% (N=16)**	**28% (N=12)**	**33% (N=14)**

Anticipated Impacts of RIFS – 35 Total Responses

	% of Workforce Impacted	Research Workforce (No. of responders)	Administrative Workforce (No. of responders reporting)
1st	**<5%**	6	8
2nd	**5-10%**	7	4
	11-15%	0	2
3rd	**16-25%>**	3	3
	>25%	1	1

Next Steps

Transition Impact Survey, Phase II

Preliminary Results

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Next Steps

- Survey to remain open until: June 23, 2025
- Full analysis will follow and posted on COGR website.

Costing and Financial Compliance (CFC)

Jeremy Forsberg, Asst. Vice President for Research, U. Texas Arlington (Chair)

Kimberly Croft, Director of Cost Analysis, Massachusetts Institute of Technology*

Casey Erickson, Asst. Vice President, Sponsored Programs, University of Washington*

MC Gaisbauer, Business & Integration Manager, U. California Sata Barbara*

Krystina Gross, Assoc. Vice Chancellor for Finance and Sponsored Projects, Washington University St. Louis*

Vivian Holmes, Executive Director, Research Administration, Massachusetts Institute of Technology

Michael Legrand, Associate Controller and Finance Director, University of California, Davis

Nate Martinez-Wayman, Senior Director, Post Award Administration & Compliance, Duke University*

Julie Schwindt, Director, Post Award Accounting, U. Mississippi Medical Center*

Jeffrey Silber, Senior Director, Sponsored Financial Services, Cornell University

Maria Soliman, Director, Grant Accounting, University of Iowa*

Cindy Hope, Director, COGR

At-Large Committee Members

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- Defend the Spend
  - Tactics for mitigating the inefficiency
  - Also see COGR's [Points to Consider for Reimbursement of Expenses Under Active Grants](#)
- Non-cancellable commitments and financial closeout for termination notices
  - Assessing the risk
  - Also see COGR's Costing Points to Consider for Terminations and Suspensions
- Joint Associations Group on Indirect Cost (JAG)
  - Fiscal Accountability in Research (FAIR) models – sharing next week
- Strategies to mitigate reductions to federal funding & F&A cost reimbursement
- Documenting/describing institutional subsidization of federally funded research

Contracts & Grants Administration (CGA)

Lisa Mosley, Executive Director, Sponsored Projects Administration, Yale University (Chair)

Maggie Ewell, Director, Pre-Award, George Mason University*

Michael Glasgow, Vice President & Executive Director, Sponsored Programs, U. Connecticut

Walter Goldschmidts, Assoc. Vice President for Research, Cold Spring Harbor Laboratory*

Stephanie Gray, Asst. VP for Research & Director of Sponsored Programs, U. Florida

Charles Greer, Assoc. Vice Chancellor for Research, U. California, Riverside

Twila Reighley, Assoc. Vice President for Research, Michigan State University*

Craig Reynolds, Vice President for Research Protections, Van Andel Institute

Jennifer Rodis, Policy & Planning Analyst, University of Wisconsin-Madison*

Lori Schultz, Asst. Vice President, Research Administration, Colorado State University

Krystal Toups, Director, COGR

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CGA Initiatives

Current and Ongoing Issues:

- NIH Updated NIH Policy on Foreign Subawards
  - Proposals
  - Existing Awards
  - Structure
- Terminations/Appeals
- NSF
  - New Annual Malign Foreign Talent Recruitment Program Certification for PIs/co-PIs
  - GC-1 Award certification
  - Award Amendment Language related to 15% indirect cost rate
  - DEI Compliance Certification Language

Other issues since February:

- COGR Initiates Contact with Newly Appointed NIH Director Regarding the Partnership Between NIH and Research Institutions and Requests Clarifications on NIH Policies
- Public Access
  - Revision: Notice of Updated Effective Date for the 2024 NIH Public Access Policy
  - Multi-Association Comment Letter on NIH Plan to Increase Findability and Transparency of Research Results Through the Use of Metadata and Persistent Identifiers (PID) - NOT-OD-25-050
- Response to DOE Interim Final Rule (IFR),

Upcoming Items:

- Comments in Progress: Federal Acquisition Regulations (FAR) Overhaul initiative
- Framework for Navigating the 2025 Administration Transition
- Managing Externally Funded Research Programs update

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Research Security & Intellectual Property (RSIP)

Jennifer Ponting, Assoc. Vice President, Research Administration, U. Chicago (Chair)

Tom Burns, Assoc. Vice Provost for Research, Johns Hopkins University*

Hannah Carbone, Director for Innovation, Patents, & Licensing, California Institute of Technology*

Allen DiPalma, Director, Office of Trade Compliance, University of Pittsburgh

Sophia Herbert-Peterson, Executive Director, Office of Sponsored Programs, Georgia Institute of Technology

Kelly Hochstetler, Assoc. VP, Research Operations, U. Virginia*

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Todd Sherer, Assoc. Vice President for Research, Emory University

David Winwood, Vice President, Technology Transfer & Commercialization, Wake Forest U. Health Sciences

Kevin Wozniak, Director, COGR

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•REC and RSIP jointly met with Jesse Watkins, Deputy Director, Security and Intelligence Directorate, DARPA (Covered by REC)

•NSF SECURE Analytics Update:

 -Quarterly Advisories. The first advisory will examine how recent changes to China's S&T governance may impact research security. Secure Analytics is seeking input on future topics.

 -Progress report to NSF. Secure Analytics plans on publishing their 3rd quarter progress report to NSF in July.

 -Beta Testing of Argus v1. Beta testing will begin Fall 2025. Participation will include a diverse group representing both academia and small businesses. Volunteers will be approached starting in July.

 -Argus v1 Release. Base model release is planned for February 2026, concurrent with the launch of an enhanced features beta test.

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Research Ethics & Compliance (REC)

Deborah Motton, Exec. Director, Research Policy Analysis & Coordination, U. California (Chair)

Kristin Bittinger, Dean for Faculty & Research Integrity, Harvard University*

Theresa Colecchia, Of Counsel, Johns Hopkins University

Grace Fisher-Adams, Chief Research Policy Officer, California Institute of Technology*

Karen Hartman, Vice Chair, Research Administration, Mayo Clinic*

Jennifer Lassner, Assoc. Vice President for Research, U. of Iowa

Jonathan Miller, Assoc. Vice President for Research Regulatory Oversight, U. Alabama Birmingham*

Stacy Pritt, Assoc. Vice Chancellor & Chief Research Compliance Officer, Texas A&M University*

Brian Smith, Chief Ethics & Compliance Officer, U. California San Francisco*

Geeta Swamy, Assoc. Vice President for Research, Duke University

Ara Tahmassian, Chief Research Compliance Officer, Harvard University*

Debra Thurley, Asst. Vice President for Research, Pennsylvania State University*

Tracy Wilson-Holden, Assist. Vice President/Research Integrity Officer, Case Western Reserve University*

Kris West, Director, COGR

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Updates from REC Meetings with Federal Agency Representatives

- **Joint REC/RSIP Meeting with Jesse Watkins, Deputy Director, Security and Intelligence Directorate. Jessee covered most of the key points in his presentation, but note**:
  - DARPA expects PIs/co-PIs to disclose ALL patents or patent applications resulting from USG-funded research filed in a country of concern before the US. or filed on behalf of an FCOC entity. COGR has asked DARPA to compare this requirement against current instructions in the Common Disclosure Form biosketch because those instructions do not require disclosure of ALL patents.

- **REC meeting with Sheila Garrity, Director, Office of Research Integrity (ORI) and Loc Nguyen-Khoa, Deputy Director, ORI. Key points:**
  - Sample policy and procedures have been posted on ORI website. Policy is a sample; institutions do not need to use the policy's exact language. ORI will review institutions' policies starting April 2026.
  - The recent EO "Restoring Gold Standard Science" is not anticipated to impact ORI's final research misconduct rule or the administration of research misconduct proceedings by ORI and/or institutions.
  - ORI plans to issue additional guidance on other topics including small institution guidance, implementation guidance, honest error, admissions, intent, pursuing leads, proceedings with multiple institutions and respondents, following leads, and conducting assessments.
  - ORI has is working to make its review of institutional reports more efficient, including a triage team to review reports quickly, and has closed out 150 cases in the first quarter of 2025.

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Current REC Initiatives

- **Joint ARIO/COGR working groups** have been established to develop materials to support institutional compliance with the new research misconduct final regulation. Working groups include: (a) Checklist Group – 1ˢᵗ project is checklist for policy elements; (b) Decision Points Group – identification of items in the final rule where institutions must decide what route to take (e.g., RIO being permitted to conduct the inquiry); (c) Templates Group – 1ˢᵗ project is looking at development of/revision of templates for assessment, inquiry, and investigation.
  - Goal: Make tools available this summer as they are developed.
- **Update on DURC PEPP Policy** – REC director participated in joint association call with NIH re. status of DURC PEPP Policy in light of recent EO "Improving Safety and Security of Biological Research" which calls for a pause on "dangerous, gain-of-function research." NIH is awaiting implementation guidance from OSTP, once this guidance is received, NIH will implement pause and develop new guidance. Institutions should review research portfolios now to identify research that meets the EO definition of "dangerous, gain-of-function research" and consider development of "pause" plans.
- **RFIs that REC is working on**:
  - DHHS RFI – "Ensuring Lawful Regulation and Unleashing Innovation to Make American (*sic*) Healthy Again," 90 FR 20478, Comments Due 7/14/2025
  - EPA Proposed Rule – "Methylene Chloride; Regulation Under the Toxic Substances Control Act (TSCA); Compliance Date Extensions," 90 FR 22214, Comments due 6/26/25
  - Also considering whether to comment on NIH Request for Information on Responsibly Developing and Sharing Generative Artificial Intelligence Tools Using NIH Controlled Access Data (NOT-OD-25-118) – comments due July 16, 2025

Thank you!

See you in Washington D.C.
October 23-24, 2025

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