



## Data Management and Sharing (DMS) and the Cost of Compliance

### Results from the COGR Survey on the Cost of Complying with the New NIH DMS Policy

May 11, 2023

#### Overview

The new *NIH Data Sharing and Management Policy* (DMS) was effective on January 25, 2023.<sup>1</sup> While large NIH sponsored research projects (above \$500,000 in direct costs) already were subject to these DMS requirements, the new policy is now applicable to all NIH projects that result in the generation of scientific data.<sup>2</sup> In response to the anticipated administrative and cost burden associated with the new policy, COGR conducted a survey in the fall of 2022 to project the annual cost impact. Thirty-four (34) institutions completed the survey and the results were both expected and concerning.

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*KEY FINDINGS: For mid-size to large research institutions, the annual projected cost impact is expected to exceed \$500,000 at the central administrative level, while also exceeding \$500,000 at the academic level—a total impact that exceeds \$1 million per institution. Cost impact is measured both by new expenditures and reallocation of effort away from an individual’s current responsibilities. In the case of Researchers and Investigators, this results in a shift away from conducting science in the lab toward tasks that might be considered more administrative in nature. For smaller and emerging research institutions, the cost impact also is expected to be significant, and for these institutions, the disproportionate negative impact may discourage their participation in the federal research ecosystem.*

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The administrative and cost burden created by the new NIH DMS policy is significant. While NIH has created some mechanisms to share in the cost of compliance, implementation of these mechanisms is uncertain. As has been the trend for the past three decades, new compliance requirements, effectively, are implemented as unfunded federal mandates. This ultimately strains the capacity of all institutions to conduct research in an efficient and effective manner.

#### Survey Methodology

COGR analyzed the DMS survey results for two cohorts of institutions based on the institution’s total federal research (R&D) expenditures as reported in the Fiscal Year 2021 National Science Foundation (NSF) Higher Education Research and Development (HERD) Survey, released in December 2022.<sup>3</sup>

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<sup>1</sup> See <https://sharing.nih.gov/data-management-and-sharing-policy>

<sup>2</sup> See <https://sharing.nih.gov/data-management-and-sharing-policy/about-data-management-and-sharing-policies/data-management-and-sharing-policy-overview#before>. The DMS Policy does not apply to training, infrastructure development, and non-research activities (see Section III. Scope: <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-21-013.html>)

<sup>3</sup> See [FY 2021 HERD Survey](#), Data Tables, Table 24 (December 15, 2022)

**Cohort A – Mid-Size to Large Institutions:** Twenty-nine (29) research institutions (16 public, 13 private) with annual federal R&D expenditures of \$100 million or more completed the survey.

**Cohort B – Smaller Institutions:** Five (5) research institutions (4 public, 1 private) with annual federal R&D expenditures of less than \$100 million completed the survey.

The Alchemer on-line survey tool was used to collect data from the 34 participating institutions. Each institution was asked to estimate burden for the following 11 units/areas:

**Central Administrative Units (CAUs):**

- 1) Pre-Award/Proposal Development
- 2) Institutional Review Board
- 3) Office of Research Integrity
- 4) Vice President of Research Office
- 5) Campus Libraries
- 6) Information Technology
- 7) Post-Award

**Academic Areas (AAs):**

- 8) Dean/School Administration
- 9) Academic Department Administration
- 10) Faculty/Principal Investigator(PIs)/Researchers
- 11) Graduate Students

**Five ACTIVITIES for potential burden were defined:**

- 1) **PLANNING/DESIGN/START-UP (DATA PLAN).** Drafting a DMS Plan at the proposal stage in compliance with both the Institutes, Centers, and Offices (ICO)-specific requirements and the Final NIH Policy for Data Management and Sharing. In addition, making adjustments to the DMS Plan as requested by the ICOs at the Just-In-Time stage.
- 2) **DATA COLLECTION/SECURE STORAGE/MANAGEMENT (DATA STORAGE).** DMS Plan management, including: data repository management, curating the data, metadata management, data ingest, data security and privacy, and other activities to ensure the proposed DMS Plan is being followed.
- 3) **DATA INTEGRITY/RETENTION/SHARING (DATA INTEGRITY).** Activities that include: licensing, archiving, preserving, infrastructure upgrade, and other data maintenance tasks that ensure data integrity and data availability to the research community.
- 4) **MONITORING/OVERSIGHT/AUDIT (MONITOR).** Includes the ongoing monitoring, oversight, and audit activities to ensure the approved DMS Plan is being complied with.
- 5) **PROJECT CLOSEOUT/LONG-TERM RETENTION/COST RECOVERY (POST-CLOSEOUT).** Includes maintaining the data after the period of performance is completed; both administratively and financially (e.g., determining how data storage and retention will be paid for).

Institutions were then asked to assign a “**Burden Factor**” to each “CAU/AA” and “ACTIVITY” combination. For example, Pre-Award/Proposal Development was assigned a Burden Factor for each of the five ACTIVITIES. The following Burden Factors were defined:

**1.00 – Low Impact:** No new staff, no reallocation of existing staff effort, no new training, no new IT investments.

**2.00 – Low/Moderate Impact:** No new staff, some reallocation of existing staff effort, some new training, some new IT investments.

**3.00 – Moderate/High Impact:** Consideration of new staff, more significant reallocation of existing staff effort, new training, new investments.

**4.00 – High Impact.** Serious consideration of new staff, significant reallocation of existing staff effort, significant new training, significant IT investments.

After aggregating the results for the two cohorts—Cohort A (Mid-Size to Large Institutions) and Cohort B (Smaller Institutions)—an “**Average Burden Factor**” (ABF) was calculated for each CAU/AA and ACTIVITY combination. For example, the survey results for Pre-Award/Proposal Development and the activity of DATA PLAN resulted in an ABF of 2.69 for Cohort A and 2.60 for Cohort B. In the context of the Burden Factor scale, the results for both Cohort A (2.69, see Figure 1) and Cohort B (2.60, see Figure 2) lean slightly toward Moderate/High Impact (3.00).

## Survey Results

Below are the survey results showing the ABF for each CAU/AA Area and ACTIVITY combination, first for Cohort A (Figure 1), followed by Cohort B (Figure 2). Note that while an ABF of 2.00 to 2.50 indicates some burden, we have excluded these results as “too low” to demonstrate significant quantifiable burden at this time.<sup>4</sup> Also note that while Monitoring and Post Closeout activities were not shown consistently as significant for this survey, it is likely they will become more significant later in the grant life cycle.

*Figure 1: Cohort A ( > = \$100 million), Average Burden Factor (ABF)*

	DATA PLAN	DATA STORAGE	DATA INTEGRITY	MONITOR	POST CLOSEOUT
Pre-Award/ Prop Dev	2.69	--	--	--	--
Campus Libraries	3.00	2.97	3.00	--	--
Information Tech (IT)	2.79	3.21	3.17	--	2.93
Faculty/PIs/ Researchers	3.59	3.66	3.66	3.14	3.17
Graduate Students	2.72	2.69	2.83	--	--

<sup>4</sup> This methodology resulted in no projected burden in either Cohorts A or B for 3 out of the 11 CAUs /AAs: Institutional Review Board, Office of Research Integrity, and Vice President for Research Office. While no projected burden was reported, it will be important to continue monitoring these three and all other CAUs/AAs.

The ABF for Mid-Size to Large Institutions (29 institutions in total, 16 public, 13 private) shows that three activities—submitting data plans, managing data storage, and ensuring data integrity—are projected to create the most significant burden for these institutions. In the case of the other two activities—ongoing monitoring (mostly related to compliance) and managing closeout activities, quantifiable significant burden was not identified at this point in time. However, this could change as awards subject to the new NIH DMS policy proceed into the later years of the award.

In the context of the Central Administrative units and Academic areas, three CAUs—Pre-Award, Campus Libraries, and Information Technology, and two AAs—Faculty/PIs/Researchers and Graduate Students, are projected to experience the most significant burden. With the exception of Pre-Award, which indicated burden only applicable to submitting data plans, the two other CAUs and the two AAs indicated new burden in at least three activities. In the case of Faculty/PIs/Researchers, moderate to high impact burden was projected in all five activities.

*Figure 2: Cohort B (< \$100 million), Average Burden Factor (ABF)*

	DATA PLAN	DATA STORAGE	DATA INTEGRITY	MONITOR	CLOSEOUT
Pre-Award/ Prop Dev	2.60	--	--	--	--
Post-Award	--	--	--	2.60	--
Campus Libraries	2.80	3.20	3.00	3.00	2.80
Information Tech (IT)	2.60	3.20	3.00	2.80	3.00
Dean/School Admin	--	--	--	2.60	--
Academic Dept Admin	--	--	--	2.80	2.60
Faculty/PIs/Researchers	3.20	3.00	2.60	3.20	--

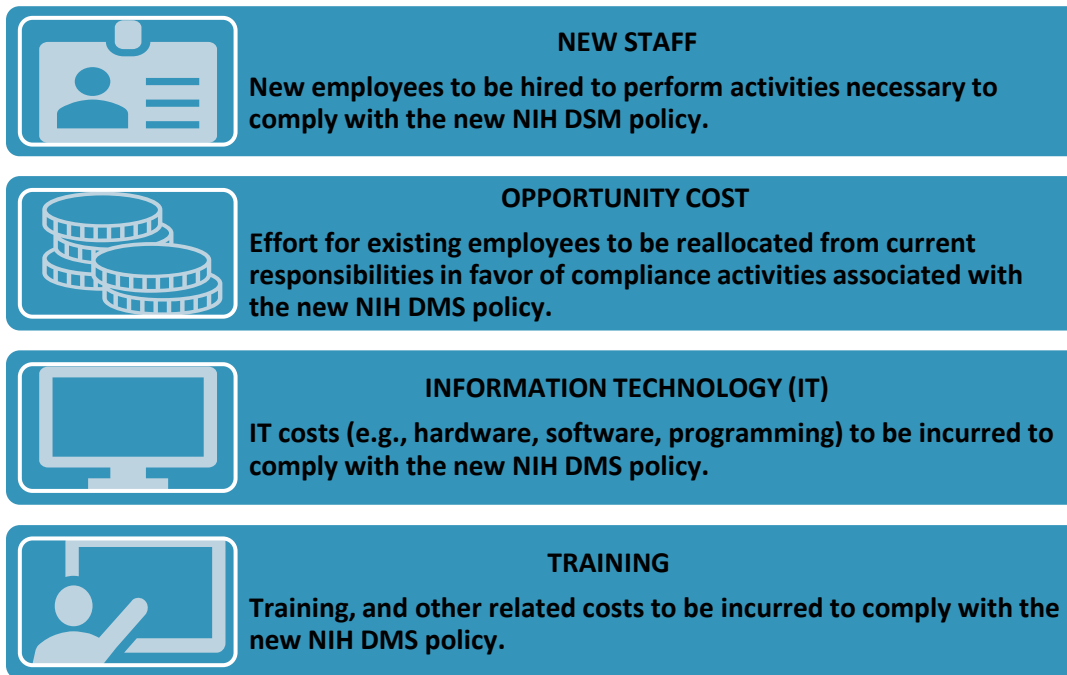
The limited sample size of five institutions does not allow for statistically sound conclusions for smaller institutions. However, it is worth noting a few observations. First, as is the case with mid-size to large institutions, Campus Libraries and Information Technology (CAUs) and Faculty/PIs (AAs) will experience the most significant burden. Second, *all five activities* are projected to consistently create new burden for smaller institutions, with monitoring distributed across *six* CAUs/AAs.

Again, though the sample size is limited, these results suggest that smaller institutions also will incur new administrative and cost burden associated with the new NIH DMS policy. Further, in the context of a commitment by the federal government (and other stakeholders) to expand the role of smaller and emerging research institutions within the research ecosystem, new administrative and cost burden may serve as a disincentive for participation by these institutions.

## Cost of Compliance for Mid-Size to Large Research Institutions

Average Burden Factors (ABF) exceeding 2.5 for any Central Administrative/Academic Area and ACTIVITY combination are of concern. In order to quantify the burden in terms of cost impact, the ABF was linked to the four “Cost Drivers”—the same four cost drivers COGR used in the *Research Security and the Cost of Compliance, Phase I - November 2022* study.<sup>5</sup>

### Four Cost Drivers



We used the following quantification methodology based on the following incremental ABF scale to establish a foundation for determining the annual cost burden impact.<sup>6</sup> The basis for scale is described on the following page.

- 1.00 – Low Impact:** Cost burden \$0
- 2.00 – Low/Moderate Impact:** Cost burden \$0
- 2.50 – Low/Moderate Impact:** Cost burden \$0
- 3.00 – Moderate/High Impact:** Cost burden \$75,000
- 3.50 – Moderate/High Impact:** Cost burden \$150,000
- 4.00 – High Impact:** Cost burden \$225,000

<sup>5</sup> See *Research Security and the Cost of Compliance, Phase I - November 2022*

<sup>6</sup> Using *Pre-Award/Proposal Development and DATA PLAN, Cohort A* (see Figure 1) as an example, the conversion of an ABF of 2.69 to the annual cost burden impact is as follows. **STEP 1:** the ABF of 2.69 falls between \$0 and \$75,000 according to the scale. **STEP 2:** the 2.69 exceeds the 2.50 by .19. **STEP 3:** the .19 represents 38% of the 2.50 to 3.00 interval. **STEP 4:** therefore, \$75,000 times 38% equals \$28,500 (see Figure 3).

The annual cost burden amounts assigned to each “.50 increment” on the ABF scale are based on COGR’s longstanding experience in studying and documenting regulatory and compliance burden. Using the ABF of 4.00 (High Impact) as the starting point, the following shows how we determined \$225,000 to be the appropriate benchmark:

- **“Serious consideration of new staff”** would result in new costs of at least \$100,000 for a full compensation package. This figure represents the approximate base salary for one new staff assistant, plus their fringe benefits (full compensation package).<sup>7</sup>
- **“Significant reallocation of existing staff effort”** would result in three or more existing staff to assume new responsibilities associated with DMS compliance work. Using the same \$100,000 compensation package and a 25 percent reallocation of responsibilities, the “opportunity cost” would be \$75,000.<sup>8</sup>
- **“Significant IT investments”** would result in annual costs of a baseline amount of \$25,000 (conservative estimate) associated with investments into the IT infrastructure of the institution, with the most significant investments made at the central level. This would include the purchase of hardware, software, and other IT applications.
- **“Significant new training”** would result in annual costs of a baseline amount of \$25,000 (conservative estimate) associated with investments in training (e.g., designing the program, on-line materials, conducting training) to implement a campuswide training program. While some training would fall under “significant reallocation of existing staff effort,” these new training costs are above and beyond the reallocation of effort.

The approach described above is summarized as follows:<sup>9</sup>

$$\begin{aligned} & \text{New Staff } (\$100,000) + \text{Opportunity Cost } (\$75,000) + \text{IT } (\$25,000) + \text{Training } (\$25,000) \\ & = \underline{\underline{\$225,000}} \text{ (High Impact, 4.00, Cost Burden Benchmark)} \end{aligned}$$

From this benchmark, the ABF scale is calibrated as follows:

**ABF equal to 4.00, \$225,000:** high likelihood of new staff, significant reallocation of effort, new IT and training investments are certain.

**ABF equal to 3.50, \$150,000:** may or may not result in new staff, though significant reallocation of effort and new IT and training investments are certain.

**ABF equal to 3.00, \$75,000:** excludes any possibility of new staff, though reallocation of effort and new IT and training investments are certain.

**ABF equal to 2.50, \$0:** represents an unquantifiable new cost burden.

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<sup>7</sup> The \$100,000 amount used as the basis for a “full compensation package” is a reasonable estimate for a staff assistant position. At the same time, this is a conservative methodology since it does not consider the possibility that senior staff might be considered as a new staff addition.

<sup>8</sup> The same \$100,000 amount is used as a reasonable estimate for reallocation effort for a staff assistant position. Again, this is a conservative methodology. And in the case of Faculty/PIs/Researcher effort being reallocated, the \$100,000 amount is significantly conservative.

<sup>9</sup> It is a reasonable to estimate the amounts for both cohorts to be relatively similar. The difference, however, is that the smaller institutions from Cohort B may be less-resourced, and hence, unable to make the necessary investments.



Using this methodology for Cohort A, the annual “Cost of Compliance” for an institution with \$100 million, or more, in annual federal R&D expenditures can be projected.

**Figure 3: Cohort A ( > = \$100 million), Cost of Compliance**

	DATA PLAN	DATA STORAGE	DATA INTEGRITY	MONITOR	POST CLOSEOUT	TOTAL UNIT/ACAD
Pre-Award/ Prop Dev	\$28,500	--	--	--	--	<b>\$28,500</b>
Campus Libraries	\$75,000	\$70,500	\$75,000	--	--	<b>\$220,500</b>
Information Tech (IT)	\$43,500	\$106,500	\$100,500	--	\$64,500	<b>\$315,000</b>
Faculty/PIs/ Researchers	\$163,500	\$174,000	\$174,000	\$96,000	\$100,500	<b>\$708,000</b>
Graduate Students	\$33,000	\$28,500	\$49,500	--	--	<b>\$111,000</b>
<b>TOTAL ACTIVITY</b>	<b>\$343,500</b>	<b>\$379,500</b>	<b>\$399,000</b>	<b>\$96,000</b>	<b>\$165,000</b>	<b>\$1,383,000</b>

**Figure 3 shows the projected annual “Cost of Compliance” for an institution with \$100 million, or more, in annual federal R&D expenditures to be almost \$1.4 million.**

Using the same extrapolation methodology that was used in the *Research Security and the Cost of Compliance, Phase I - November 2022* study, the twenty-nine (29) institutions surveyed with more than \$100 million in annual federal R&D expenditures can be used to project the cumulative cost impact for the 120 institutions with over \$100 million in annual federal R&D expenditures, as shown in the FY2021 HERD Survey.<sup>10</sup>

**The projected annual cumulative cost impact for these 120 institutions exceeds \$165 million.**<sup>11</sup>

## Faculty and Investigator Burden

In the *Research Security and the Cost of Compliance, Phase I - November 2022* study, we hypothesized that faculty and investigator burden would be significant given the extent to which disclosure and training activities focus on these individuals. However, the survey methodology used in that report did not provide a way in which to quantify faculty and investigator burden.

In this survey, respondents assigned a Burden Factor to each CAU/AA and ACTIVITY combination for Faculty/PI/Researchers (as well as for Graduate Students) allowing for a methodology to project the cost impact on faculty and investigators. For example, the survey results for Faculty/PIs/Researchers and the activity of PLANNING/DESIGN/START-UP (DATA PLAN) resulted in an ABF of 3.59 for Cohort A (see Figure 1) and 3.20 for Cohort B (see Figure 2).

<sup>10</sup> See [FY 2021 HERD Survey, Data Tables, Table 24 \(December 15, 2022\)](#)

<sup>11</sup> \$1,383,000 average per institution, times 120, equals \$165,960,000

In the context of the Burden Factor scale, the results for Cohort A (3.59) significantly exceed Moderate/High Impact (3.00)—approaching High Impact (4.00). For Cohort B (3.20), the results show the burden on Faculty/PIs/Researchers exceed Moderate/High Impact (3.00).

By example, the cost impact of engaging in DATA PLAN activities for Faculty/PIs/Researchers (in Cohort A) was projected based on a Burden Factor of 3.59. This suggests a projected cost impact of between \$150,000 and \$225,000. And using the same methodology as shown earlier (*see footnote 6*), the result is a projected cost impact of \$163,500 (see Figure 3). Extending the analysis to all five activities, the projected cost impact on Faculty/PIs/Researchers is \$708,000.

This number—\$708,000 on an annual basis—indeed, is concerning. At one level, this number may be overestimated. The \$708,000 encompasses all phases of the grant life cycle and this cost burden may be prorated over the multiple years included in the term of the award. At the same time, another mitigating factor could be that over time both faculty and the NIH will be more proficient as stakeholders become more experienced in all facets of data management and sharing activities. Consequently, the cost burden may not be as severe. On the other hand, the \$708,000 may be underestimated as the cost burden will be multiplied many times depending on how many faculty at a given institution are required to comply with the new NIH DMS policy.

Regardless of the interpretation used and potential changes over time, the annual cost impact will be consequential. It most likely will manifest itself by the hiring of data managers (or postdocs to serve as data managers) to serve one or more faculty members, significant investments in IT data management activities to store and maintain data, and the allocation of investigator time away from conducting science in the lab toward tasks that might be considered more administrative in nature.<sup>12</sup>

***While there is high value to open access and data sharing, the downside to any new compliance requirement—regardless of the value-added—is the trade-off of faculty time spent in the lab performing actual research. Further, to the extent that the NIH directly funds DMS activities, the inevitable result is that less funds are available for the science conducted in the lab, which means less science for the nation as whole.***

As faculty administrative burden continues to grow, an honest assessment as to how this impacts the quality and quantity of science—and the United States' preeminence as the world leader in the global research ecosystem—must be considered.

## Cost of Compliance for Smaller Institutions

The five (5) institutions that participated in the COGR survey with less than \$100 million of federal R&D expenditures fall in the range of \$40 million to \$99 million in annual federal R&D expenditures. While this range does not capture the smallest institutions as shown in the HERD,<sup>13</sup> the results provide some insights to the challenges faced by smaller and emerging research institutions. The same quantification methodology that was used for mid-size to large research institutions (Cohort A) also was used for smaller institutions (Cohort B). The results are shown on the next page.

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<sup>12</sup> The [Federal Demonstration Project](#) is an organization that includes federal and research institution members. According to its most recent [2018 Faculty Workload Survey](#), faculty continue to spend a significant amount of their grant time on grant administration activities. The 2018 study estimated that faculty administrative effort associated with federal research awards continues to exceed 40% of their total research effort. New DMS compliance requirements will add to this burden.

<sup>13</sup> According to the [FY 2021 HERD Survey](#), Data Tables, Table 24; 644 institutions reported federal R&D expenditures. The smallest figure reported was \$34,000.



*Figure 4: Cohort B (< \$100 million), Cost of Compliance*

	DATA PLAN	DATA STORAGE	DATA INTEGRITY	MONITOR	POST CLOSEOUT	TOTAL UNIT/ACAD
Pre-Award/ Prop Dev	\$15,000	--	--	--	--	<b>\$15,000</b>
Post-Award	--	--	--	\$15,000	--	<b>\$15,000</b>
Campus Libraries	\$45,000	\$105,000	\$75,000	\$75,000	\$45,000	<b>\$345,000</b>
Information Tech (IT)	\$15,000	\$105,000	\$75,000	\$45,000	\$75,000	<b>\$315,000</b>
Dean/School Admin	--	--	--	\$15,000	--	<b>\$15,000</b>
Academic Dept Adm	--	--	--	\$45,000	\$15,000	<b>\$60,000</b>
Faculty/PIs/ Researchers	\$105,000	\$75,000	\$15,000	\$105,000	--	<b>\$300,000</b>
<b>TOTAL ACTIVITY</b>	<b>\$180,000</b>	<b>\$285,000</b>	<b>\$165,000</b>	<b>\$300,000</b>	<b>\$135,000</b>	<b>\$1,065,000</b>

*Figure 4 shows the average annual “Cost of Compliance” for the five institutions with less than \$100 million in annual federal R&D expenditures. As is the case with mid-size to large research institutions, the total exceeds \$1 million, though the limited sample size prevents any broad conclusions or extrapolations.*

Still, the survey results suggest that smaller and emerging research institutions also will experience a significant cost impact. Given that smaller institutions often have a less developed compliance infrastructure, the cost of compliance poses a serious, and perhaps insurmountable, barrier to entry for institutions that are early in building their research enterprise. *Consequently, this may discourage smaller and emerging research institutions from participating in the research ecosystem.*

## Concluding Thought: The Cost of Inaction

The title of this paper is the *Cost of Complying with the New NIH DMS Policy*. The underlying title is the *Cost of Inaction*. ***The “cost of inaction” alludes to the consequences and impact to the nation’s research ecosystem if the cascade of new federal regulations—which are continually piling on research institutions—is not addressed.***

COGR maintains a running list of new regulations mandated upon research institutions since 1991.<sup>14</sup> The list has grown significantly, continues to grow, and there is no end in sight. Further, each item on the list represents not just one new compliance requirement, but often translates into dozens—and sometimes hundreds—of new compliance actions that must be initiated by an institution. While COGR supports the principles around transparency, open access, and data sharing,<sup>15</sup> it is worth noting that the new NIH DMS policy represents still another regulation added to the list without a viable mechanism for the NIH to pay for its “fair share” of the cost of compliance.

The results of the COGR survey demonstrate that the annual cost impact on research institutions to comply with the new NIH DMS policy will reach into the hundreds of thousands of dollars, and in many cases, will exceed \$1 million dollars. While the new policy includes provisions to allow institutions to “direct charge” DMS costs to an award, the high price tag on these costs suggest that, at best, only a small fraction of these costs will be covered by NIH. If NIH were to cover a significant portion of DMS costs in the total award budget, the likely result would be a reduction of other costs normally included in the total award budget. This problem is highlighted when considering NIH funding mechanisms—for example, modular awards—where the total direct costs are capped and steadily squeezed.<sup>16</sup>

Title 2 of the Code of Federal Regulations (CFR), *Grants and Agreements*, includes Part 200—*Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*. Section 200.100(c) of Title 2<sup>17</sup> describes the partnership between research institutions and the federal government as it relates to the equitable sharing of costs and includes this text: *The [cost] principles are designed to provide that Federal awards bear their fair share of cost.* While this requirement is helpful, Appendix 3, C.8.a. to Title 2, Part 200<sup>18</sup> contradicts the “fair share” requirement by stating: *the administrative costs charged to Federal awards... must be limited to 26% of modified total direct costs.*

***The 26% limitation is applicable only to institutions of higher education. State, local, tribal governments, nonprofit entities, and private industry are not subject to a similar cap.*** As COGR has documented in surveys over the past three decades,<sup>19</sup> nearly all colleges and universities, irrespective of size, *exceed* the cap. It is clear current cost reimbursement mechanisms available to research institutions ensure that the federal government will ***not*** bear its fair share of costs. Consequently, every new federal regulation issued is effectively an unfunded federal mandate.

<sup>14</sup> See, COGR, [List of Regulatory Changes Since 1991](#)

<sup>15</sup> Also see the August 2022 Memorandum published by the Office of Science and Technology Policy (OSTP)—*Ensuring Free, Immediate, and Equitable Access to Federally Funded Research—as another new policy addressing open access. This more recent policy notice may result in new costs of compliance to be borne predominantly by research institutions.* See <https://www.whitehouse.gov/wp-content/uploads/2022/08/08-2022-OSTP-Public-Access-Memo.pdf>

<sup>16</sup> COGR wrote to NIH in December 2022 addressing concerns with the current and inadequate modular budget cap of \$250,000—NIH Modular Grant Application and Award Process Letter. See: [https://www.cogr.edu/sites/default/files/FINAL%20COGR\\_Modular%20Tabak%20Letter%20November%202022%20%28002%29.pdf](https://www.cogr.edu/sites/default/files/FINAL%20COGR_Modular%20Tabak%20Letter%20November%202022%20%28002%29.pdf)

<sup>17</sup> eCFR: [2 C.F.R. § 200.100\(c\) -- Purpose.](#)

<sup>18</sup> eCFR: [Appendix III to Part 200, Title 2 -- Indirect Costs Identification and Assignment, and Rate Determination for IHEs.](#)

<sup>19</sup> These COGR survey results are available primarily to COGR members, but aggregated data can be made more broadly available upon request.

***The “Cost of Inaction” is not hard to predict.*** For smaller and emerging research institutions, the cost burden will potentially become prohibitive to their continued participation in the federal research ecosystem. For mid-size research institutions, they will continue to participate, but may choose to retreat from conducting certain types of federally sponsored research. For large research institutions, most likely, they will continue full participation, but even they may choose to restructure the composition of their research portfolios. As for faculty, investigators, and those aspiring to be researchers, the ever-growing administrative burden required to conduct federally sponsored research has and will continue to lead some to seek other careers that are less complicated. And for the United States, our position as the global leader in science and technology will be challenged. Future generations of Americans will bear the cost—a less-creative, less-robust research enterprise that diminishes American ingenuity, imagination, and innovation.

***Now is the time to confront the “Cost of Inaction.”***

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*COGR is grateful to the 34 institutions that participated in the survey. Their thoughtfulness and patience resulted in high-quality data that enabled COGR to draw strong conclusions based on the survey results.*

## **Data Appendix and Contact Information**

A Data Appendix, including source data (deidentified) and selected summaries and graphs of the survey results, are available as a separate attachment.

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