



April 26, 2017

The Honorable Mick Mulvaney
Director
White House Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Mr. Mulvaney,

On behalf of the [Association of American Universities](#) (AAU), [Association of Public and Land-grant Universities](#) (APLU) and the [Council on Governmental Relations](#) (COGR) and the over 200 research universities our organizations collectively represent, we write to request that OMB quickly begin the process of standing up the Research Policy Board mandated by section 2034 of the [21st Century Cures Act](#) (Cures Act), *Reducing Administrative Burden for Researchers*.

The Cures Act, enacted on December 13, 2016, includes a number of critical [recommendations](#) made by the National Academies Committee on Federal Research Regulations and Reporting Requirements that aim to reduce administrative work associated with the regulation of federally funded research while maintaining equivalent protections and oversight. These provisions, if effectively implemented, have the potential to significantly reduce regulatory burden and costs and to allow investigators to focus more of their time on innovative research that improves the health and economic well-being of our nation.

One of the core recommendations made in the National Academies report and subsequently contained in the Cures Act is the creation of a Research Policy Board. Specifically, the language in the Cures Act directs OMB to establish the new Board and the process by which members of the Board will be appointed within one year of enactment. Per the Academies report, “the regulatory regime (comprising laws, regulations, rules, policies, guidance, and requirements) governing federally funded academic research should be critically reexamined and recalibrated.” As directed by the Cures Act, the Board, consisting of federal and non-federal members--including university representatives and university affiliated non-profit organizations with relevant expertise--will advise the federal government on the effects of federal research regulations and reporting requirements and recommend ways to modify, streamline and harmonize them. As conceived by the National Academies, the Board would also prospectively advise on proposed rules and draft policies and guidance.

With a steady [increase in regulations](#) governing federally funded research over the last two decades and over \$6 billion annually in unreimbursed university costs and cost sharing, an increasing proportion of researcher time and federal and institutional funding is being dedicated to regulatory compliance. The Research Policy Board

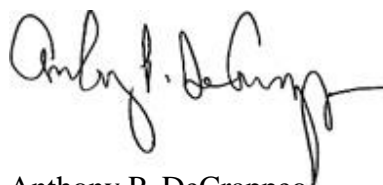
would allow university officials and their representatives with strong knowledge of the regulations and their impact on research to engage in regular discussions with federal policymakers and ensure the effectiveness and efficiency of existing and proposed regulations, policies and guidance.

AAU, APLU and COGR have been actively engaged with Federal agencies and offices in seeking ways to harmonize, streamline and eliminate unnecessary regulatory requirements associated with federal research awards. We have collected data and written extensively on research regulatory reform and engaged with the Office of Information and Regulatory Affairs, the National Academies, the National Science Board and Congress on these issues. To further advance these past efforts, we urge swift implementation of the regulatory reform efforts mandated by statute and specifically the creation of the Research Policy Board. We would welcome the opportunity to meet with you and/or your lead staff to answer any questions and to discuss these reform opportunities in more detail.

Sincerely,



Mary Sue Coleman
President
Association of American Universities



Anthony P. DeCrappeo
President
Council on Governmental
Relations



Peter McPherson
President
Association of Public and Land-grant Universities

cc: Senator Lamar Alexander
Senator Patty Murray
Dominic Mancini, OIRA