

Navigating the Storm: Institutional Perspectives on a Changing Federal Landscape

June 6, 2025



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Speakers:

 #COGRJune25



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COGR


Today's Agenda

- **Session Intro, Logistics, and Agenda Overview**
- **Discussion Tables** *(30 minutes)*
- **Free Discussion** *(5 minutes)*
- **Table Reports** *(Summarized by COGR Directors, 30 minutes)*
- **Q&A** *(15 minutes)*

Session Logistics

29:57

Start	Stop	Reset	mins:
30	secs:0	type: None	▼

 Breaktime for PowerPoint by Flow
Simulation Ltd. ☐ Show Settings

- **Each table is assigned a discussion topic**
- Each discussion topic has a series of **discussion prompts**
- **To Access Discussion Prompts:**
 - Scan the QR code on your table with your mobile device, OR
 - Access these slides on the COGR website at www.cogr.edu under Latest News – Slide Presentations – Navigating the Storm
- Use the discussion prompts as a guide, **but feel free to expand your conversation and/or focus on the prompts of most interest to your table** (no need to cover everything!)
- Report Outs: **Choose one person from each table** to briefly summarize the table discussion and report out. **To submit your table report:**
 - Mobile Devices: Scan the QR code on your table
 - Laptops: Visit www.cogr.edu/tabletopics and select “Submit Report Here” next to your table topic

Table Reports

COGR

Advancing Effective Research Policy

**COMPLIANCE DURING
UNCERTAINTY**

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**FUTURE OF
RESEARCH**

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**RESEARCH
SECURITY**

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**TERMINATIONS
AND APPEALS**

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**F&A AND OTHER
COSTING ISSUES**

Research Security (Cybersecurity Implementation (CMMC & NIST 800-171))

1. Has your institution already implemented or has near term plans to implement security controls and policies to meet:
 - For NIST 800-171 only
 - For both NIST 800-171 and CMMC
 - Do not plan for compliance
 - Don't know
2. With proposed F&A caps and priority shifts, has your institutions re-evaluated, delayed, or otherwise altered the implementation of your cybersecurity compliance regime? If so, have you devised ways to delay or downsize implementation without negatively impacting research.
3. Has your institution foregone a funding opportunity due to NIST 800-171 or CMMC requirements? If so, has your institution come up with a strategy to support researchers who have not been able to apply for funding due to compliance requirements?
4. What impedes your institution from taking steps or completing NIST 800-171 (or CMMC) compliance? Has your institution devised a plan to overcome these impediments?

Compliance During Uncertainty (IACUC, IRB, DURC, etc.)

1. How is your compliance office dealing with this era of constrained resources?
2. How is your institution preparing for/handling the government's False Claims Act enforcement initiative aimed at institutions of higher education?
3. NIH has a new [initiative](#) to reduce the use of animals in NIH-funded research and has stated that it will train grant review staff to "participate in mitigation training to address any possible bias towards" animal studies. Is your research animal protection program considering this new initiative in its review of protocols and training of researchers? Is your institution moving away from animal research?
4. How far along is your institution toward implementing the Sept. 2024 Public Health Research Misconduct regulations? Have you updated your current policy or developed a new policy?
5. What is your institution doing in response to the May 5, 2025, Executive Order Improving the Safety and Security of Biological Research and the resulting pause of "dangerous gain-of-function" (DGOF) research and NIH's directive in NOT-OD-25-112 that institutions "review ongoing research activities to proactively identify [DGOF] and identify safe actions to halt such research..."

F&A Cost Reimbursement & Other Costing Issues (F&A Rate Caps, Additional Requirements for Expenditure Reimbursement on Active Grants, etc.)

1. How to/should we prepare for implementation of caps?
 - Financial impact mitigation
 - Administrative changes
 - If we can do so compliantly, is it practical to directly charge more, currently, indirect cost?
2. Strategies for efficiently responding to Defend the Spend (DTS) and other requirements for expenditure reimbursement justifications. See [Points to Consider for Reimbursement of Expenses Under Active Grants](#) (V.1, Released May 13, 2025).
 - Methods to complete adequate detail for draws and/or post draw DTS requests.
3. Strategies for efficiently addressing restrictions on reimbursement of allowable expenses, such as closeout costs and noncancellable commitments, after the date of termination.
4. Given current conditions, is your institution allowing spending while waiting for continuations that do not arrive prior to the end of the current budget period? Considering closer monitoring? Other?

Future of Research (Funding Gaps, Next Generation, Alternative/New Funding Models, International Collaborations, Funding Constraints, Alternative Sources, Supporting Researchers, etc.)

New/Alternative Models:

- As federal priorities evolve, how can institutions proactively safeguard their core research mission, academic values, and long-term autonomy?
- *What new models, governance strategies, or collaborative approaches should be considered to ensure mission alignment and operational resilience?*

Academia and Government Partnerships:

- With strain in the academic–government research partnership, what are the most pressing risks undermining this relationship today—and what new strategies, frameworks, or advocacy efforts are needed to rebuild trust, ensure alignment, and sustain mutual value?
- *How can institutions lead in stabilizing this partnership, and what indicators should we monitor to guide timely, strategic responses?*
- What existing/new tools, governance models, or protective strategies are needed to safeguard university investments — both financially and reputationally — in this evolving landscape?

Next Gen:

- What institutional models or incentives are needed to support the next generation of researchers, grad students, and postdocs — especially in an environment with declining stability and rising risks? What pathways are needed?

Funding Gaps/Constraints:

- Has (or do you anticipate) the current funding environment caused your institution to seek more research funding from sources other than the federal government? If yes, is there a lead source your institution is pursuing?
- What do you see as the main challenge in successfully diversifying your institution's research funding?
- Will the disposition of research results (intellectual property ownership, rights to publish research results) contribute to your university's diversification plan?
- How do institutions build research resilience to sustain momentum, protect gains, and continue advancing research excellence?
- How must our institutional research strategies evolve to remain competitive and sustainable amid shifting federal funding priorities and increased uncertainty?
- What are the opportunities?
- Given the current and anticipated federal shifts, where do we still have leverage or influence?
- How can institutions more effectively advocate for themselves or shape the narrative around the value of research?

Terminations & Appeals (Reimbursement Issues)

1. With unprecedented instances of federal agencies terminating awards and breaching agreed-upon terms and conditions, how should institutions reassess approaches to federal research partnerships as federal funding is shifting to a “high-risk” vendor?
2. *What adjustments in compliance frameworks, risk management strategies, and funding diversification are needed to protect institutional investments and maintain research continuity?*
3. What are the effects of the unprecedented terminations? What are the long-term consequences? How do institutions shift and mitigate these risks?

A top-down view of a wooden desk. In the upper right, a portion of a white laptop keyboard is visible, showing keys for a decimal point, plus/equals, and hyphen/underscore. To the left of the keyboard is a yellow paperclip. Three sticky notes are arranged horizontally in the center: a pink one with a large black 'Q', a light green one with a large black '&', and another pink one with a large black 'A'. A silver pen lies diagonally in the lower right corner.

Q

&

A