The COGR F&A Paper

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COGR
Council On Governmental Relations

An association of research universities
Chapter Leaders & Panel

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Why this Paper and Why Now?

COGR was founded in 1948 as a “Committee” under NACUBO. One of the primary functions was to advocate for fair F&A reimbursement.

AND FAST FORWARD 70 YEARS …

The paper will be a compendium of the various F&A issue discussions; the hope is that the paper will be a longstanding resource to the research community, as well as an advocacy-piece that can be used when F&A (inevitably) comes under scrutiny (again) in the future.
Title & Table of Contents

Excellence in Research: The Funding Model, Indirect Costs, and Why the System Works

Chapter 1. BRIEF HISTORY
Chapter 2. F&A FOR “NON-ACCOUNTANTS”
Chapter 3. F&A “NUTS AND BOLTS”
Chapter 4. AUDIT AND OVERSIGHT
Chapter 5. POLICY & SPECIAL TOPICS
Chapter 6. FACTS OVER MYTHS
Chapter 7. THE CAP AND BURDEN
Excellence in Research: The Funding Model, Indirect Costs, and Why the System Works

Chapter 8. WHY THE SYSTEM WORKS
Chapter 9. ALTERNATIVE SYSTEMS
Chapter 10: IMPROVING THE SYSTEM
CONCLUSION

Appendices under development: COGR F&A Survey, Managing Regulatory Burden, Technical-Average Costs, Transparency Case Study, Specific Improvements
Goal of this Paper

This paper is meant to provide a basis for productive discussion so that research funding debates are no longer diverted by nonproductive disagreements over caps on F&A cost reimbursement and misunderstandings about what is included in the F&A cost rate. It addresses equitable reimbursement of F&A costs, how the F&A cost rate works, misunderstandings and myths, and other related topics. The paper makes clear that a reliable F&A cost reimbursement policy is critical to the continued success of the research enterprise of the United States, in part through providing a strong educational foundation for understanding how the current system works and exploring potential improvements.
F&A for the “Non-Accountant”

Talking F&A in a simpler way!

- Oil Change case study
- The Federal Dollar (MIT Dollar) and the University Contribution
- User-friendly graphics
F&A “Nuts & Bolts”

Talking F&A in really technical way!

- Examples of “F” and “A” costs, MTDC, and examples of unallowables
- Pools, Allocation Basis and the Calculation
- On and Off rates, other types of rates
Audit and Oversight

F&A cost rates are tightly regulated!

- HHS (CAS) and ONR
- IGs, Agency Grant Reviews
- Single Audit
Policy and Special Topics

Related topics that should be addressed

- Reimbursement and Unrestricted funds
- Integral Distribution
- The Tuition relationship
- Industry and Foundations and F&A cost rates
- Other Countries (UK, EU, Australia, Canada)
Facts Over Myths

Start with the Facts!

- F&A are real costs
- No profit
- 50% rate is not 50 cents to F&A
- Flat rates will create major disruption
- Faculty benefits from F&A reimbursement
- F&A does not incentive building new buildings
- We are enthusiastic contributors
- We do not subsidize Foundations
- Reducing burden is good, but rate impact NA
The Cap and Burden

“Relatively” objective analysis on the 26% cap

➢ History of the 26% cap

➢ Admin efficiency and the 2000 RAND study

➢ Considering regulatory burden

➢ Administrative and compliance burden and shifting costs to universities
Why the System Works

Current system not perfect, but …

- Rates help ensure compliance with federal regulations
- Premised on actual institutional costs
- “Averaging” approach is efficient
- Don’t forget jobs and the economic engine
- U.S. system maximizes creativity and research excellence

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Discussion is good; alternatives may not be?

- Flat rates
- Absolute direct charging
- Rates by type of science
- Fixed price model
- Separate billing and drawdown of F&A
Improving the System

Five Recommendations

- Better Language – More Transparency (e.g., F&A cost rate)
- More flexibility around direct charging
- Meaningful reduction in regulatory burden
- Leverage the Uniform Guidance (2014 improvements, and let’s keep going)
- Convene Annual Roundtable (Us, Funding agencies, Cognizants, OMB)
Schedule

Feedback to COGR, send to dkenndeddy@cogr.edu
(by early November)

Final version
(late December, and release on Jan. 2, 2019)

E-versions for sure, Hard copies to be determined