# JOINT ASSOCIATIONS GROUP (JAG) ON INDIRECT COSTS: TOWARD A NEW INDIRECT COSTS FUNDING MODEL

TOWN HALL

MAY 12, 2025

#### JAG NATIONAL ORGANIZATIONS





















# Today's Agenda

- Welcome & Introductions of JAG Organizations
- Presentation: Overview of F&A, the JAG Effort, and Process
- Participants Comments & Questions
- Wrap Up and Next Steps

#### Virtual Town Hall – How to Engage



**Q&A**: Use the **Q&A** function (bottom center) to ask questions.

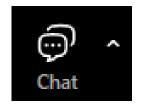
Upvote and comment on other attendees' questions.

Do not use the chat window to ask questions of the panelists.



**Hear something you like? (or don't?)** 

Use the React feature at anytime to share with the panelists and fellow attendees your reaction.



Use the chat window to relay any technical issues to the panelists.



This session is being recorded and will be shared publicly.

#### **Important Links**

- National Organizations Announce Joint Effort to Develop a New Indirect Costs Funding Model (April 2025)
- Indirect Costs Subject Matter Experts Team
- Submit Questions, Feedback, and Inquiries

- Background Materials:
  - F&A Cost Reimbursement Materials (COGR)

\*

- All Media Inquiries Should Be Directed To:
  - Rob Marus, Deputy Vice President for Communications, at rob.marus@aau.edu

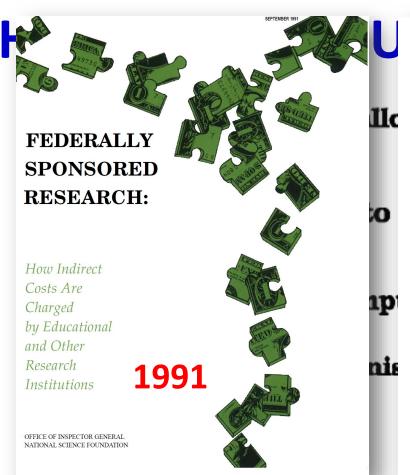
#### **Today's Presenter:**



**Dr. Kelvin Droegemeier,** Professor of Atmospheric Science and Special Advisor to the Chancellor for Science and Policy at the University of Illinois Urbana-Champaign, and former WH OSTP Director

# The Joint Associations Group (JAG) on Indirect Costs: A Community Strategy for Developing a New Indirect Costs Model

#### The Direct + Indirect Costs (Now F&A) Model



GAO United States Government Accountability Office
Report to Congressional Committees

September 2010

UNIVERSITY RESEARCH

Policies for the Reimbursement of Indirect Costs Need to Be Updated

led

2010



GAO-10-937

NBER WORKING PAPER SERIES

INDIRECT COST RECOVERY IN U.S. INNOVATION POLICY: HISTORY, EVIDENCE, AND AVENUES FOR REFORM

> Pierre Azoulay Daniel P. Gross Bhaven N. Sampat

Working Paper 33627 http://www.nber.org/papers/w33627

NATIONAL BUREAU OF ECONOMIC RESEARCH 1050 Massachusetts Avenue Cambridge, MA 02138 March 2025

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At least one co-author has disclosed define after the ships of potential relevance for this research. Further information is available of amount by a www.m.er.org/papers/w33627

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#### **Efforts to Explain F&A Abound!**



Excellence in Research: The **Funding Model, F&A** Reimbursement. and Why the System Works

CUMULATIVE Total of Regulations & Policies Adopted, and/or Substantially Modified & Changes in Interpretation of Regulations or Business Practices Affecting Federal Research Since 1991

**Demystifying** the **Academic Research Enterprise** 

> Becoming a S Scholar in a C Competitive E

Kelvin K. Droegemeier

Strengthening the **Government-University Partnership in Science** 

Report of the Ad Hoc Committee on Government-University Relationships in Support of Science Committee on Science, Engineering, and Public Policy

> National Academy of Sciences National Academy of Engineering Institute of Medicine

**F&A SURVEY CAPSTONE: COST REIMBURSEMENT** RATES, ACTUAL REIMBURSEMENT, AND **ROWING REGULATORY INTERPRETATION** 

ults of the

GR 2023 F&A Survey

NBER WORKING PAPER SERIES

Working Paper 33627

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A Guide to Understanding Indirect **Costs & Indirect Rates Structuring** 







Report to Congressional Committees

Effect of Indirect Cost

Revisions and Options

for Future Changes

UNIVERSITY

RESEARCH

#### The Distribution of Indirect Cost Recovery in Academic Research

Alexandra Graddy-Reed, Maryann Feldman, Janet Bercovitz, W. Scott Langford

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momic growth. In the US, tens of billions of dollars are spent each year on research and developing with the federal government contributing over half of these funds. Yet a decline in relative federal funding highlights the role of other funders and their varying contractual terms. Specifically, non-feder funders provide lower recovery of indirect costs. Using project-level university sponsored research administrative records from four institutions, we examine indirect cost recovery. We find significant ariation in the amount of indirect funding recovered - both across and within funders, as well as to ferent academic fields within a university. The distribution of sponsors in the overall research funding ortfolio also impacts indirect cost recovery. The recovery variation has important implications for the ustainability and cross-subsidization of the university research enterprise. Together, our results show where universities are under-recovering indirect costs.

Keywords: Academic R&D. Administrative Costs. Indirect Costs. Federal Fundin

Written Testimony of Dr. Kelvin K. Droegemeier

Submitted to the Appropriations Sub-Committee on Labor, Health and Human Services,
Education and Related Agencies
United States House of Representatives
for the heaving tilted
The Role of Facilities and Administrative Cost in Supporting YIH-Funded Research
Tuerday, Cotheber 24, 2017, 10(20) ann EDT
Rytum House Office Building, Room 238-8 B

I thank Chairman Cole, Ranking Member DeLauro, and Members of the Subco Think Thirmin (vol., Schalage Mornhell DeLano, and Mondesto of the Sofoomanine for the particularly at the Schalage Mornhell DeLano, and Mondesto of the Sofoomanine for the particularly at the Schalage Mornhell Schalage (Schalage Mornhell), and Worthermers Change Weep Professor of Motorology, and Worthermers Change Weep Professor of Motorology, and Worthermers Change Bond (2004-2016), the late for goyers on New Columna, and presently serve in the Column of Oddishous Governor Mory Falls in Secretary of Science and Technology. I am usefully as followed in my yorker or an admits of science and Technology. I am usefully as followed in my yorker or an admits research, administrator, teacher, and short on uniters of circuits.

I also thank the Members of this Subcommittee for their longstanding commitment to fostering national prosperity, economic security, quality education, and international competitiveness through support for basic and translational research at the National Institutes of Health. The topic of this hearing is important to that commitment and traces its roots to the pre-World War II rra. Not unlike the U.S. Constitution, the framework of facilities and administrative (F&A)

#### 1. Direct and Indirect Costs: Definition, Application and Viewpoints

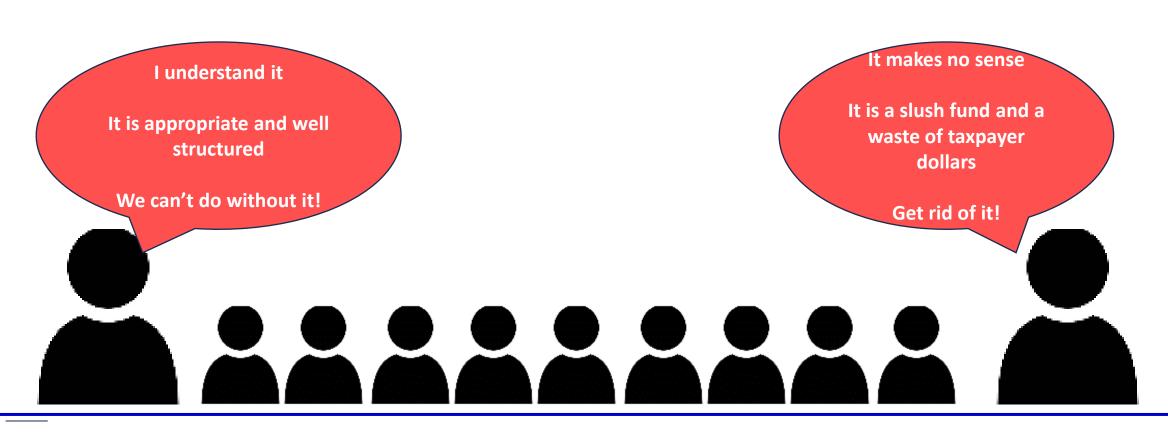
of higher education has been bifurcated into direct and indirect costs, also known as overhead and, most recently, as facilities and administrative (F&A) costs. Although the categories of funding composing these costs have changed over the years, the general concept remains

#### One Challenge: Hugely Diverse Audience

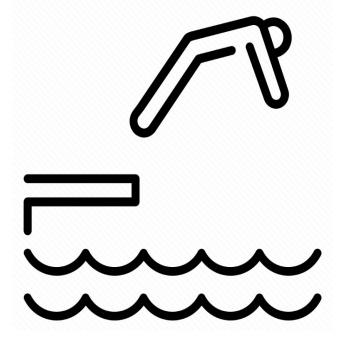
- The White House
- Congress
- Government Funding Agencies
- Private Companies
- Non-Profit Foundations
- Government Relations Experts

- Research Administrators
- Faculty and other Researchers
- University Executive Officers
- The General Public

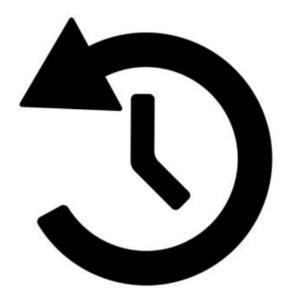
# A Spectrum of Understanding, Worldviews and Goals



#### **An Important Consideration**



**Before Diving Into Proposing Changes...** 



...Understand the History, Context, and Implications

- Prior to WWII, virtually all research in higher education was funded by philanthropy or private foundations
- Faculty and Administrators at private universities were funded mostly by endowment income and tuition
- State universities relied mostly on state appropriations and tuition
- Little interest existed in obtaining Federal money for fear of intrusion and control



- In 1937, the National Cancer Institute (NCI) was created within the National institutes of Health (NIH)
- NCI began issuing Federal grants for university research – all other NIH research was performed in-house
- The National Research Council helped create a concept for the National Bureau of Standards to provide research funding to universities. The bill failed but NRC involvement calmed fears in academia

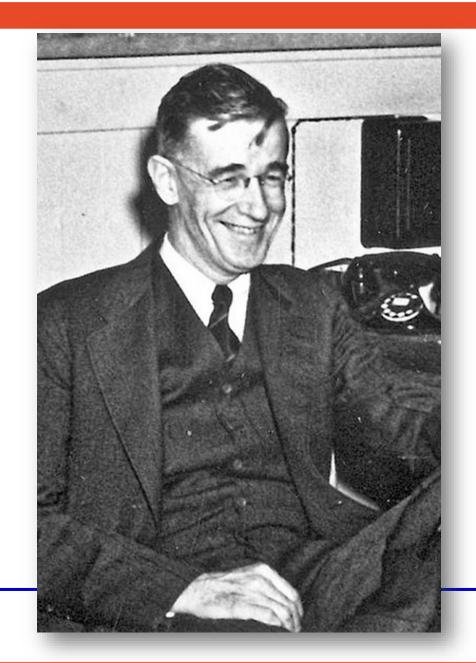


- In 1939, President Roosevelt began mobilizing the Nation for war
- Prior to this time, universities received little Federal government funding for research for fear of intrusion
- The National Advisory Committee for Astronautics (NACA), led by Vannevar Bush, began providing contracts to individual university researchers



Image Credit: PBS

- Vannevar Bush also was President of the Carnegie Institute and understood that universities bring a lot of resources to the table for research (buildings, equipment, people)
- He established a two-part funding model to leverage university assets for incremental cost by the Government
  - Direct costs (people, travel, equipment)
  - Indirect costs (administration, support services, other things related to the research)
     fully reimbursed by the government



- In June, 1940, President Roosevelt authorized Bush to fund academic and industrial research for national defense
- Higher education began accepting the funding owing to need and patriotism
- This watershed moment set the stage for an 80-year PARTNERSHIP between the Government and academia in performing research of MUTUAL BENEFIT.

# Strengthening the Government-University Partnership in Science

Report of the Ad Hoc Committee on Government-University Relationships in Support of Science Committee on Science, Engineering, and Public Policy

> National Academy of Sciences National Academy of Engineering Institute of Medicine

> > NATIONAL ACADEMY PRESS Washington B.C. 1983

> > > APR 2 5 1983

LIBRARY

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Image Credit: MIT Museum

#### F&A: A Key Component of the Government-Academic Partnership

INDIRECT COSTS APPLIED APPLIED FACILITIES AND FUNDED **ADMINISTRATIVA S** RESEARCH

Image Credit: ChatGPT

#### The Grant Proposal Budget, Part 1: Direct Costs

These items
 represent direct
 costs that are
 easily identified
 for a given
 project

#### Item Description

Salaries and wages (principal investigator, coprincipal investigator, other senior personnel, postdoctoral researchers, technicians, and support staff)

Stipends for graduate and undergraduate students

Fringe benefits for all personnel

Materials, supplies, and services

Publication/dissemination costs

Equipment

Consulting services

Special computing services

Domestic and international travel

Special facilities utilization

Subcontracts

Participant support costs (e.g., subjects to be interviewed)

#### The Grant Proposal Budget, Part 2: Indirect Costs

- Shown at the right are
   Indirect Costs
- They are real costs borne by institutions to support organized research and are heavily leveraged by funders such as the USG
- They get paid out of institutional funds, up front, as organized research takes place

Category	Description
Facilities	Building depreciation: expenses associated with university-owned buildings, including the expense associated with federal contributions to those buildings.
	Equipment depreciation: expenses associated with university-owned capital equipment, including federal contributions to such equipment.
	Interest: interest associated with external debt financing of building acquisition and construction or renovation, less interest income earned on debt proceeds.
	Operations and maintenance: utilities, janitorial services, and ongoing repair and maintenance of university-owned and leased buildings.
	Library: operational costs of the university's library system excluding rare books but including staff.
Administration	General administration: payroll, executive and administrative offices, human resources, accounting, etc.
	Sponsored project administration: offices and personnel responsible for administering sponsored project activity.
	Departmental administration: administrative costs for each college and departmental or school.
	Student administration and services: costs associated with supporting students, such as the office of student affairs.

#### The Grant Proposal Budget, Part 2: Indirect Costs

- Imagine tracking these things for EACH research project, as in direct costs!
  - How much electricity is used by each of 20 graduate students or researchers in the same lab funded by 8 different grants
  - How much of the HR organization is used for appointments on each grant
  - How much of the Payroll office is used in the same way

Category	Description
Facilities	Building depreciation: expenses associated with university-owned buildings, including the expense associated with federal contributions to those buildings.
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## Facilities and Administrative (F&A) Costs

- Instead....each institution periodically assesses space and other resources utilized for organized research overall
- An F&A "rate" is then created based upon this formula ->
- At UIUC, F&A rate = 58.6%
  - F = 32.8%
  - A = 26.0%
- The A component has been capped since 1991 (later slide)

Category	Description
Facilities	Building depreciation: expenses associated with university-owned buildings, including the expense associated with federal contributions to those buildings.
	Equipment depreciation: expenses associated with university-owned

$$F \& A Rate = \frac{Indirect \ costs \ allocated \ to \ organized \ research}{Modified \ total \ direct \ research \ costs}$$

Administration General administration: payroll, executive and administrative offices, human resources, accounting, etc.

Sponsored project administration: offices and personnel responsible for administering sponsored project activity.

students, such as the office of student affairs.

Departmental administration: administrative costs for each college and departmental or school.

Student administration and services: costs associated with supporting

Library: operational costs of the university's library system excluding

## Facilities and Administrative (F&A) Costs

- The F&A "Rate" for a given institution is set by the Federal government and negotiated every few years
- Rates vary considerably across institutions (upcoming slide) owing to location, facilities, local costs, etc
- Suppose the rate is 50%. What does this mean? 50% of the budget goes toward indirect costs?
   NO!

Category	Description
Facilities	Building depreciation: expenses associated with university-owned buildings, including the expense associated with federal contributions to those buildings.
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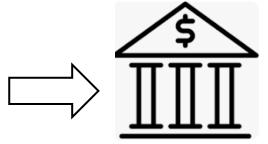
#### **How F&A Figures into the Budget**

- Suppose the Direct Costs for a grant proposal are \$100,000 and the F&A rate is 50%
- The total budget is then
  - \$100,000 (Direct Costs)
  - F&A Rate x \$100,000 (Direct Costs) = \$50,000 (Indirect Costs)
  - \$150,000 Total Budget (Direct + Indirect Costs)
- Here, F&A COST is 1/3<sup>rd</sup> of the total budget (\$50K/\$150K), not 50% of it (F&A RATE)!!
- Now the confusing part for many.... The institution receiving the grant pays for activities in the F&A categories as research is happening and then is REIMBURSED by the Federal government project-by-project.

#### **General Example of Reimbursement**







You Withdraw \$40,000 From Savings Account to Have Roof Replaced Immediately



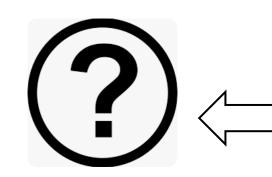
You Hire a Roofing Company to Replace the Roof and Pay \$40,000 from Savings



A Month Later, the Insurance Company Reimburses You \$40,000 After the New Roof is Installed

#### **Key Points**

- F&A costs are funded up front, by institutional resources, to support government-funded projects.
- 2. The government **reimburses** institutions for F&A funds because they are real funding associated with research.
- 3. The reimbursed funds may be re-invested by the institution in any legal manner deemed useful.



Have You Done Anything
Wrong? Have You Defrauded the
Insurance Company, or Were You Free
to Re-Invest the Reimbursement as
You Saw Fit?



You Decide to Re-Invest the Reimbursed \$40,000 From the Insurance Company to Remodel Your House and Improve its Value.



You Deposit the \$40,000
Reimbursement from the Insurance
Company Back Into Your Savings Account

#### **Institutional Use of Reimbursed F&A**

- Institutions reinvest reimbursed funds in research according to their own models
- Confusion arises because of how the F&A system is designed
  - Reimbursed F&A funds usually are not returned to the specific accounts that paid for the F&A costs as the research was happening (e.g., utilities, HR services, sponsored programs office, library in the case of universities)
  - This leads to the perception by some that F&A reimbursement is not being used for its intended purpose, even though it is a reimbursement
- Other issues exist with the F&A model, e.g., ability to game the system in various ways

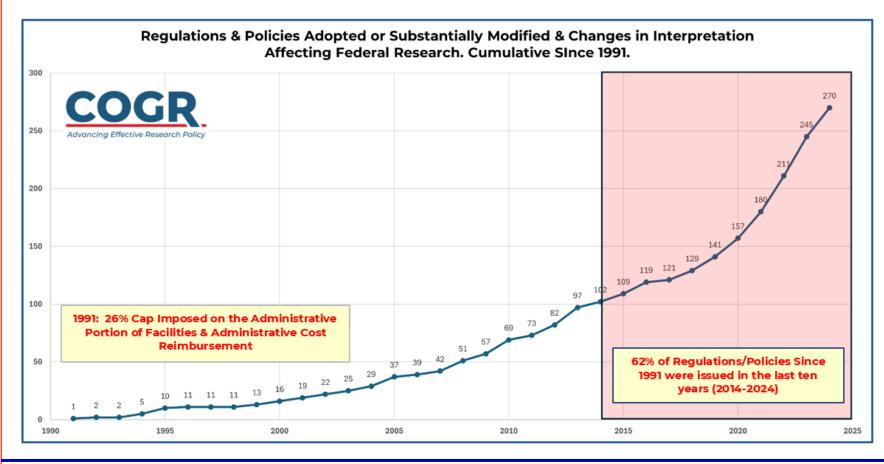
#### Facilities and Administrative (F&A) Costs

- Why all this gory detail?????
- Because it is important to understand that F&A represents real dollars that are needed by institutions to support research funded by external sources
- It's true that higher F&A rates mean less direct money in a given project
  - Researchers understandably want lower rates and don't "see" the F&A even though its fruits clearly support their research
  - So do Federal funding agencies!!
- It's also true that without F&A reimbursement, research institutions could not support research and related activities, including the education and training of students by universities, in the ways they now do

#### **Two Other Key Points About F&A**

- <u>Point 1</u>: Some Federal agency research programs do not allow institutions to use their <u>FEDERALLY</u>
   <u>NEGOTIATED</u> F&A rate. They limit the allowable rate to 30% etc
- Point 2: Recall F&A rate has two parts: at UIUC, the negotiated F = 32.6%,  $A = 26.0\% \rightarrow 58.6\%$ 
  - The "A" component has been capped at 26% since 1991 despite a HUGE increase in compliance requirements placed on research institutions (next slide)
  - The real rate at UIUC going into negotiation is 65.5%
  - The F&A rate UIUC actually realizes is 23.1% owing to accepting many grants with reduced or no F&A (e.g., especially as a Land-grant from USDA, funds flowing through from State agencies). This is true for other institutions
- Across all academic research institutions, this amounts to about ~\$6.8B of unrecovered F&A reimbursement each year
- Private companies operate differently and can charge fees and profit in addition to recovering indirect costs. Foundations also operate differently – both for good reason

#### **Unfunded Compliance Mandates**

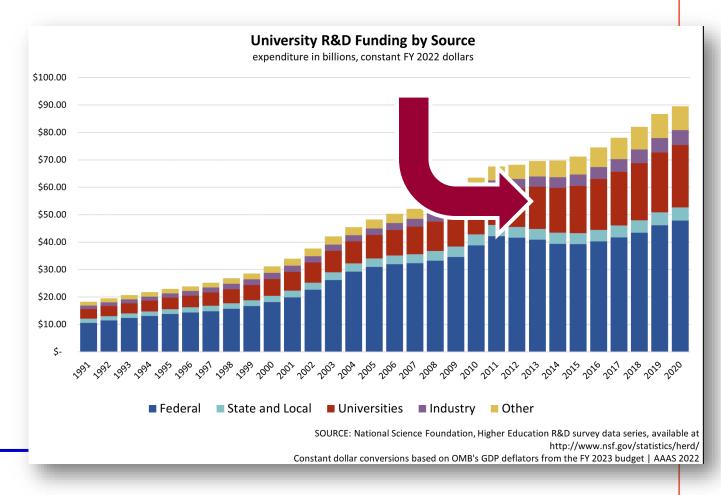


- 270 new or substantially modified requirements since 1991
- 62% of them occurred in the past 10 years
- 181% growth in past 10 years
- No new Federal \$ for these since 1991!!
- Institutions have had to
   EAT these additional costs
- In the case of universities, tuition is sometimes used to partly offset these costs

Image Credit: COGR

# Sources of Funds for University R&D

 Some of the growth of university investment in research has come from having to support unfunded Federal compliance mandates on the previous slide



#### **Recent Developments**

- Earlier this year NIH issued a new policy limiting the F&A rate it allows to a flat 15% rate
- Subsequent caps have been issued by DOE and NSF, both of 15% for college and university research
- A new 15% cap on F&A reimbursement has been issued by DOE for for-profit organizations receiving federal financial assistance awards
- Various litigations are in progress

#### 'Devastating' cuts to NIH grants by Trump's team put on hold by US judge

The ruling temporarily halts a policy slashing research-overhead costs that left some universities wondering how to make ends meet.

By Max Kozlov, Dan Garisto & Heidi Ledford









One of the buildings on the US National Institutes of Health's campus in Bethesda, Maryland, is a hospital

#### What is Motivating the Caps on F&A?

- Issues of of transparency in the current F&A model that suggest taxpayer dollars are not being spent on research
- The notion that university endowments can offset cuts caused by F&A rate caps
- A desire to reduce Government spending
- Concerns about higher education broadly
- Comparisons of F&A rates between universities and private foundations which fund research

# Council on Governmental Relations (COGR) 2023 Survey of Indirect Cost Rates Average Rate By Classification

		Leseart h
Class	No.	on Campus
IVY	7	64.61%
AAU	50	59.01%
R2	18	51.72%
All	120	56.77%

#### Top 5 Highest Survey R spondents

Fred Hutchinson Cancer Ct		76.00%
Children's Hospital L.A.		69.50%
California Inst. of Technolo		70.00%
Weill Cornell Medicine		69.50%
NYU Grossman School of M	d.	69.50%

#### Top 5 NIH Funded Recipients

63.75%
61.50%
62.50%
61.00%
56.00%

# Selected Private Companies (Anolymize I) Private Aerospace Firm 140% 103% Not a Meaningful Comparison 166% Private Large muustry 150%

Selected American Priva e Non-Profit Foundations*					
Bill and Melinda Gates Fdn.	10%	Direct Costs			
The Ford Foundation	25%	Minimum Rate			
Not a Meaningful	10%	Direct Costs			
Comparison	15%	Direct Costs			
Andrew W. Mellon Fan	20%	Direct Costs			
The Rockefeller Foundation	15%	Direct Costs			

<sup>\*</sup> Rates are from the various foundation grant budge directives applicable to institutions of higher education.

# **Clarifying Misimpressions**

- F&A charged to the Federal government by research institutions represents the
  incremental cost associated with using mostly existing resources (e.g., HR, electricity,
  buildings, computers) significant leveraging. These are REAL DOLLARS required to
  support the research and are not fully funded by the government
- Indirect cost rates are lower at private foundations which fund research because
  - Foundations allow direct charging of many items included in F&A which cannot be direct-charged on Federal grants; and
  - Foundations do not subject recipients to the same rules and regulations as do Federal agencies. Universities accept lower indirect cost rates from foundations because such grants are a small percentage of overall university R&D funding

#### **Clarifying Misimpressions**

- Most university endowment funds are restricted to specified donor intent (e.g., tuition reduction, professorships, scholarships) and are not fungible
- The F&A rate negotiated by the Federal Government is almost always lower than the actual rate → cost sharing
- Research institutions have had to fund 270 new or substantially modified Federal compliance requirements since 1991 with no additional money in F&A from the Federal Government to do so (the A-rate cap on F&A)
- Owing to F&A limits placed on universities by Federal agencies, and the negotiated F&A rate being lower than the actual rate, universities overall are underpaid in F&A by \$6.8B/year. Underpayment also occurs for other types of research institutions

#### The Value of Research to America



- A robust US research and education enterprise means
  - Economic and national security
  - Products & services to improve quality of life
  - Educated workforce and high-paying jobs
  - New knowledge for innovation
  - Increased tax base large ROI to Government
  - Leadership in setting international standards and protocols (e.g., ethical use of AI)

### F&A is Not a Perfect Model

 The current F&A model, though used successfully for many years, does suffer from certain limitations that lead to confusion, create misunderstanding, and contain administrative inefficiencies

GAO	United States Government Accountability Office Report to Congressional Committees
September 2010	UNIVERSITY RESEARCH
	Policies for the Reimbursement of Indirect Costs Need to Be Updated



### **Clarity Driving Action**

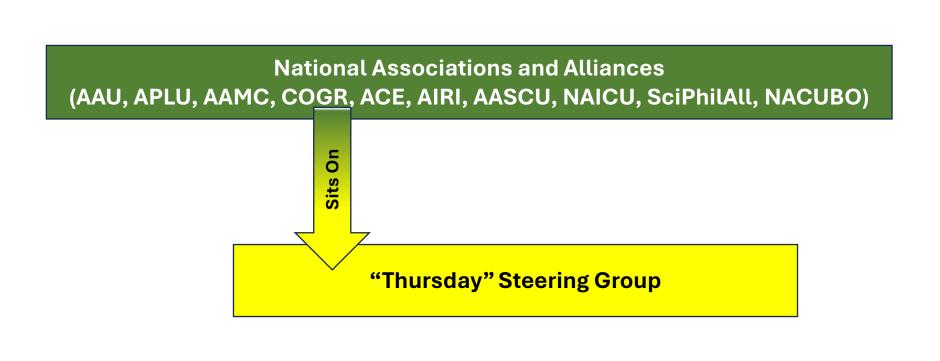
- It is clear from Congress and The White House that simply explaining
   F&A, as in the past, is no longer a viable option
- It is clear that caps on F&A and major reductions in research agency budgets and staff will weaken America in multiple ways (fundamental research, innovation, understanding and curing disease, economic strength, national security, and educating the next generation for all these important priorities)
- It is clear that limitations exist with the current F&A model and that the research community now has an opportunity to address them

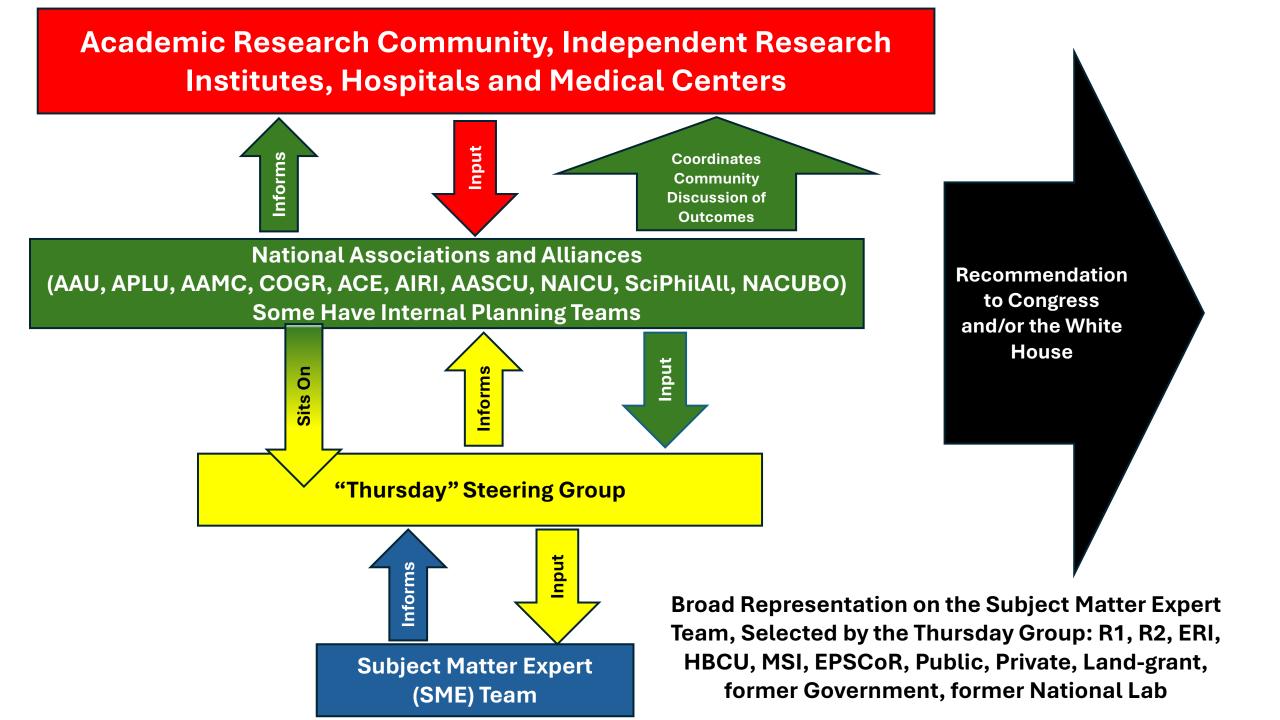
### **Approach: Joint Associations Group on Indirect Costs**

- The major academic professional associations have joined forces with the private sector and private research foundations to assemble a group of Subject Matter Experts (SME) to develop and propose to the US Government a NEW, IMPLEMENTABLE MODEL FOR INDIRECT COSTS
- The SME Team has deep expertise in all matters related to research funding and related financial management, Federal agency policy, and cost allocation
- The team is drawn from a broad cross-section of organizations representing America's research enterprise
- The ultimate goal is to help ensure that America increases its global leadership in research, innovation, and education, is a model of ethical conduct and accountability to American taxpayers, and restore the USG/academic partnership

# A Letter to Michael Kratsios, Director of the White House Office of Science and Technology Policy

- First: How can the United States secure its position as the unrivaled world leader in critical and emerging technologies
- Second: How can we revitalize America's science and technology enterprise —
  pursuing truth, reducing administrative burdens, and empowering researchers to
  achieve groundbreaking discoveries?
- Third: How can we ensure that scientific progress and technological innovation fuel economic growth and better the lives of all Americans?





### The SME Team Charge

- To undertake a rapid and thorough evaluation of the current direct/indirect cost model of USG funding to academic research institutions, independent research institutions, research hospitals, and medical centers; and
- To develop a new model for funding indirect costs, shared with and discussed by the broad research community, for submission to the Federal Government

#### **Key Characteristics of a Future Model**

- Acceptable to the research community and US Government
- Simple, clear, efficient, easily explained, and defended
- Transparent and trackable
- Accountable to taxpayers
- Based upon the actual cost of research
- Fair to all organizations, accounting for unique differences
- Minimal administrative burden
- Maximizes the ease of transition from the current model
- Eliminate uncertainty regarding funding for research support costs
- Updated definitions of costing categories
- Consistent with laws and policies, some possibly needing to be changed
- Minimal changes to existing data and financial systems
- Stable and codified in law
- Required to be used by all USG organizations
- Reinvigoration of the USG/recipient partnership of mutual benefit and trust

## The Process and Timeline: Two Sub-Teams, Two Competing Approaches

- Team Re-Envision F&A
- Team Blank Sheet of Paper
- Two separate sub-teams of the SME Team working in parallel but communicating with one another
- Develop 2-3 provisional models, by the end of May, for consideration by the broad community
- End Game: A single actionable indirect costs model conveyed to the government, hopefully to be put into legislation

### **Communicating About SME Team Progress**

- We must be careful in communicating details of the SME Team's work until provisional models are available for consideration by the broad research community – with the goal of arriving at a single model
- All community input is being considered and everything is on the table in arriving at the provisional models
- Sharing of details along the way, including structures being considered that might ultimately be rejected, would counterproductive and possibly misleading
- When presenting the provisional models to the research community, the SME
   Team will provide considerable detail about how it arrived at them

### **Working Together as a Team**

- We are firmly committed to taking a team approach, coordinating with
  - The national research community
  - The White House
  - DOGE
  - Congress on both sides of the aisle
    - House and Senate appropriators and authorizers
    - House and Senate committee staff
    - Individual Members
  - Other key players (e.g., in private industry)

### Please Continue to be Involved!

- Learn more about the effort at the QR code shown here
- Community input throughout the entire process is very important and is being facilitated through professional associations: AAU, APLU, AAMC, COGR, AIRI, ACE, AASCU, NAICU, NACUBO and the Science Philanthropy Alliance.
- You can provide input at the QR code shown here
- Community town hall webinars on May 8 and May 12. Consult the website at the QR code for updates.
- Provisional models developed by the SME Team will be presented to the broad community for input within the next few weeks. Stay tuned!





### QUESTIONS, COMMENTS & MORE INFORMATION

