



An Association of Research Institutions

WHO WE ARE

COGR is an association of over 200 leading public and private U.S. research universities and affiliated academic medical centers and research institutes. Our membership is diverse and includes the largest research performers in the nation, including 91% of all R-1 schools, as well as smaller and emerging research institutions.

We focus on the impact of federal regulations, policies, and practices on the performance of research conducted at our member institutions and advocate for sound, efficient, and effective regulation that safeguards research and minimizes administrative and cost burdens.

President's Message 2023: Reflections on a Dynamic Year

COGR Membership,

As we continued to move beyond the pandemic this past year, the importance of fostering a healthy partnership between the federal government and research institutions has been central to COGR's advocacy for sound, efficient, and effective regulation that safeguards research and minimizes administrative and cost burdens.

From an array of [new research security requirements](#), to proposed changes to the [Uniform Guidance](#), to [new data management and sharing policies](#), COGR engaged. We quickly acted when opportunities and challenges presented themselves on these and other issues affecting the ability of [COGR member institutions](#) and their faculty, staff, and students to conduct and effectively administer research. We continued to strengthen and build relationships with federal representatives as we made our case with reports, survey data, and information and expertise from our members. Often, we advocated with our partner organizations and informed their efforts with Congress on legislation affecting research. And to aid the advocacy and compliance efforts of COGR members, we created guidance, webinars, and other resources.

Over the past year, COGR continued to make progress toward harmonizing federal regulations and reducing cost and administrative burden. At the same time, we saw new federal proposals and policies that increased the burden of research regulation that further strained the government and academic partnership, a key driver of America's scientific and technological success. This dichotomy illustrated clearly that COGR's work is as important as ever to the health of the partnership and its bearing on our nation's health, security, and economic prosperity.

This past year also brought new chapters for COGR as an organization. We welcomed [11 new member institutions](#) that further diversified and strengthened the association.

Additionally, Wendy Streitz completed [four years of service](#) as COGR President. She left COGR stronger than when she started. Together, the staff and I are building on this foundation to further elevate COGR. This includes [COGR's presence on LinkedIn](#), a [new pilot program](#) for emerging research institutions (launching August 2024), and additional efforts to bolster COGR's work and serve the membership.

I invite you to read on as we highlight and reflect on the work of the association. Thank you to the Board of Directors, committees, and various workgroup volunteers for contributing their time and expertise in support of our common cause.

And thank you for your institution's membership and your continued support of COGR.

Matt Owens, President



An Association of Research Institutions

2022-2023 Year in Review

As an association of over 200 leading research institutions, COGR provides its members with expert analysis, guidance, and resources regarding the financial and regulatory infrastructure associated with federally funded research. We also foster productive relationships between the research community and federal policy makers, advocating for innovation and change that avoid unnecessary regulatory burden.

Each year, as the academic year and COGR’s fiscal year ends, we review what COGR has accomplished in key areas on behalf of its membership. COGR’s success depends on the commitment and efforts of our [Board of Directors](#), [Committee](#) members, volunteers who serve on working groups, session panels and more, and the support of our member institutions.

For an overview of Benefits of COGR Membership, [click here](#).

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Research Security

Research security continued to be a top focus of legislative and research funding agencies activities. The National Science and Technology Council’s Research Security Subcommittee and the Office of Science and Technology Policy continued their work on implementing the mandates of National Security Presidential Memorandum 33 on National Security Strategy for United States Government-Supported Research and Development ([NSPM-33](#)), with the issuance of [draft disclosure forms](#) and [draft research security program standards](#) for public comment. NSF and other research funding agencies also took steps to implement security requirements contained in the [CHIPS and Science Act of 2022](#), including provisions prohibiting covered individuals on grant proposals from participating in malign foreign talent recruitment programs (MFTRPs) and mandated research security training. Further, individual agencies launched efforts to collect information on international collaborations and published information on how they planned to review disclosures and assess risks presented. COGR closely tracked efforts in this area, attended agency listening sessions, and submitted comments on the draft disclosure forms, proposed research security program standards, and individual agencies proposed rules, guidance, and requests for information, as detailed later in this report and on COGR’s Science and Security webpage.

Recognizing the intensive institutional efforts and costs associated that institutions are incurring to meet address the continuing flow of research security requirements, COGR conducted a survey focusing on the cost burden associated with the implementation of the NSPM-33 disclosure requirements. The survey analyzed data from 26 institutions and results are set forth in Research Security and the Cost of Compliance- Phase 1 Report *Results from COGR’s Phase I Survey on the Costs of Complying with Research Security Disclosure Requirements for FY 22-23*. ([November 2022](#)), and concluded that while institutions take seriously the need for robust, risk-based measures to protect the security of federally funded research, the significant cost burden associated with these measures must be dealt with “open and equitably.” The take-away message is clear:

The projected year one average total cost per institution for compliance with the Disclosure Requirements, regardless of institutional size, is significant and concerning. The figure ranges from an average of over \$100,000 for smaller institutions to over \$400,000 for mid-size and large institutions. Although some of these expenses are one-time costs, a sizeable portion will be annual recurring compliance costs. Overall, the cost impact to research institutions in year one is expected to exceed \$50 million. Further, all research institutions will experience significant cost burden and administrative stress, and smaller research institutions with less developed compliance infrastructure may be disproportionately affected.

COGR thanks all institutions who participated in this important survey. Phase II of this study will examine institutional costs associated with compliance with NSPM-33 research security program standards after OSTP publishes the final standards.

In addition to regular coverage in meetings and COGR Updates¹, some of the steps COGR took to help its members were:

- Participated in a joint association meeting with representatives from NSF to discuss requirements for the disclosure of foreign gifts, contracts, and financial support under Section 117 of the Higher Education Act and the CHIPS and Science Act of 2022 (July 18, 2023).
- Released an *Overview of Department of Defense Statement on Countering Unwanted Foreign Influence in Department-Funded Research Institutions of Higher Education* ([July 8, 2023](#))
- On June 7, the COGR Board of Directors, selected Committee members and COGR staff met with met with Dr. Rebecca Keiser (NSF Chief of Research Security Strategy & Policy) and Dr. Kelvin Droegemeier (project consultant to NSF) at NSF's request to discuss the [RSI-ISAQ](#) that NSF is required to develop per §10338 of the CHIPS & Science Act.
- Published *Analyzing Personal Financial and Institutional Conflicts of Interest in Academic Research Contexts*, which discusses both personal financial and institutional conflict of interest issues in the context of situations in which these conflicts most commonly occur, including consulting, licensing, and clinical studies. In addition, the report addresses federal research funding agencies' recent focus on the intersection of conflicts and malign foreign influence. ([March 31, 2023](#))
- Presented on institutional costs associated with research security efforts at the National Academies of Sciences, Engineering, and Medicine's Workshop on Openness, International Engagement & Federally Funded Science & Technology Research Enterprise (Nov. 14-15, 2022).
- Released *NSPM-33 Implementation Guidance Disclosure Requirements & Standardization Talking Points for Institutions* ([October 2022](#))
- Hosted a webinar on an *Overview of the NSPM-33 Standardization Disclosure Forms for the Common Biographical Sketch and Current and Pending (Other) Support Forms* ([September 2022](#))
- Published a *COGR Matrix of Laws, Regulations, and Policies Regarding Science & Security* ([September 7, 2022](#))
- Launched the *Science and Security Resource Page* that provides information on COGR's comment letters, publications, webinars and meeting sessions, and additional resources related to science and security ([September 2022](#))
- Hosted a webinar on *Looking at the CHIPS on the Table* ([August 11, 2022](#))

¹ COGR releases detailed updates to the membership 6-8 times per year. These updates can be found under "Latest News" on COGR's website here: <https://www.cogr.edu/News-Stories>

Advocacy and the Uniform Guidance

On March 13, 2023, [COGR submitted recommendations to OMB](#) in support of revisions to the Uniform Guidance—codified under 2 CFR Part 200. The Uniform Guidance officially is known as the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, which is administered by OMB and implemented by the federal awarding agencies. Requirements of the Uniform Guidance govern the management of federal awards at both the agency and recipient level.

At the June COGR Meeting, Deidre Harrison, Deputy Controller, and Steven Mackey, Policy Analyst Policy from OMB’s Office of Federal Financial Management (OFFM) provided an update on OMB activities and the status of the revisions to the Uniform Guidance. OMB expects to publish proposed revisions to the Uniform Guidance via a proposed rule in the Federal Register in September. This will allow COGR and other stakeholders to submit detailed comments and additional recommendations on the proposed revisions. Stakeholders will be provided a 60-day public comment period. ***COGR will submit detailed comments and will encourage active participation from the COGR membership.***

As respected national experts, COGR plays a major role in shaping the revisions to the Uniform Guidance. COGR’s voice in support of research universities and nonprofit research institutions is critical to ensuring that the research community is fully represented.

As respected national experts, COGR plays a major role in shaping the revisions to the Uniform Guidance. While the Uniform Guidance applies to all types of grant recipients (e.g., states, local governments, nonprofit organizations, tribal governments), COGR’s voice in support of research universities and nonprofit research institutions is critical to ensuring that the research community is fully represented. This was the case in 2014 when the inaugural Uniform Guidance was published and remains true today.

In late July, COGR submitted additional input and [data analysis](#) to OMB covering several topical areas of importance to research institutions. We will continue to engage with OMB as the revision process unfolds. If OMB publishes the proposed revisions by late summer / early fall as planned, and accounting for the 60-day public comment period, a final version of the Uniform Guidance should be available by the end of 2023.

COGR will remain at the forefront of all developments affecting the Uniform Guidance. We will continue to support the COGR membership through the [Uniform Guidance Resource Page](#), which includes COGR comment letters, publications, and other related materials. COGR’s active advocacy efforts will continue to help ensure that the final version of the Uniform Guidance results in the best possible outcome for the research community.

NIH Data Management and Sharing Policy Implementation & Cost of Compliance Study

NIH implemented the new Data Management and Sharing (DMS) [Policy](#) for grant and contract applications submitted and other funding agreements executed on or after January 25, 2023. COGR continued to engage and advocate on issues of critical importance to members, expand resources & tools that are accessible through the [COGR NIH DMS Policy Resource Page](#), work with the community to surface challenges and concerns where

there are opportunities to advocate for effective change, partner with the Federal Demonstration Partnership (FDP) and the Association of Research Libraries (ARL) and engage with NIH colleagues.

COGR continued to bring to the forefront issues of costing concerns related to the new NIH DMS policy. At the June COGR Meeting [session](#) on DMS with Michelle Bulls, Director of the NIH Office of Extramural Research Administration (OPERA), COGR presented several key costing concerns. These concerns include identifying DMS costs that can be directly charged to an award, recovery of associated DMS-related costs through the F&A cost rate, recovery of post-closeout activities related to DMS, and most notable the “**Cost of Inaction**” highlighted in COGR’s survey report – [Data Management and Sharing \(DMS\) and the Cost of Compliance](#). The survey report found:

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.

COGR’s ongoing work on the cost of compliance and cost burden will continue to inform COGR advocacy initiatives. One major issue COGR has consistently raised to NIH is their implementation of the single-line budget requirement. COGR is pleased NIH has recently eliminated this requirement ([NOT-OD-23-161](#)) and thanks NIH for their responsiveness in addressing our concerns on this issue.

Other actions COGR took over this past year to help our members include:

- Wrote [several comment letters](#) to NIH and OSTP in response to RFI’s issued on DMS.
- Hosted federal, institutional, and association representatives at several COGR membership meetings (*recordings available, log in required*²).
- Conducted a *NIH DMS Cost of Compliance Survey* of the COGR membership to assess the new cost and administrative burden associated with complying with the new NIH DMS requirements effective January 25, 2023. ([May 11, 2023](#))
- Released *Chapter 4 Part II of the COGR NIH Data Management and Sharing Readiness Guide on Budgeting and Costing: Project-based and Institutional Cost Considerations* ([February 15, 2023](#))

² See <https://www.cogr.edu/Meeting-Reports-and-Agendas-Archives>

- Hosted Michelle Bulls, Director, Office of Policy for Extramural Research Administration (OPERA) for a *NIH Data Management and Sharing Readiness Webinar* ([January 17, 2023](#))
- Released *Chapter 4 Part I of the COGR NIH Data Management and Sharing Readiness Guide on Budgeting and Costing* ([December 19, 2022](#))
- Released *Chapter 3 Part II of the COGR NIH DMS Readiness Guide: Implementation Roles and Responsibilities* ([November 2022](#))
- Hosted a webinar in collaboration with the Association of Research Libraries: *Gearing up for January 2023: Institutional Strategies for Implementing the NIH Data Management and Sharing Policy* ([September 29, 2022](#))
- Released *Chapter 3 Part I of the COGR NIH DMS Readiness Guide: Institutional Considerations* ([August 15, 2022](#))

2023 F&A Cost Rate Survey & Capstone Report

COGR initiated its first F&A Cost Rate Survey since 2017³ in January. The survey was closed in May and we shared preliminary results with the membership at the [June COGR Meeting](#). The results of the survey provide a resource for member institutions to benchmark key metrics and further assist COGR in advocacy efforts around F&A issues. COGR members will have access to certain data and can perform data analysis on several institutional attributes and survey responses that were collected in the survey. *Note: Survey data is for internal use only and should not be shared outside the institution per COGR policy. Survey data and select reports will be kept in the COGR Member Portal (log in required).*

Similar to the report published in 2017, a capstone report will be published later in 2023. This is a public-facing report that will address findings, concerns, and points of advocacy around the cost of research. As a public-facing report, metrics such as F&A cost rates and under-recovery of F&A costs incurred are shown at the aggregate level only—data at the institution level will not be shown in the capstone report.

A special thank you to all institutions that participated in the survey. The response rate approached 60 percent, which ensures that the conclusions of the pending capstone report will be statistically sound and relevant to our advocacy efforts.

Additional Highlights and Accomplishments

- On August 2, 2023, COGR [published an analysis](#) on [Executive Order 14104](#) “Federal Research and Development in Support of Domestic Manufacturing and U.S. Jobs.”
- On June 28, 2023, COGR published its [annual update](#) of the “List of Aggregated Regulatory Requirements Impacting Federally Funded Research Since 1991.” Although regulations affecting research have been in place for decades, 1991 is the baseline year for this list because in that year, the federal government, by way of OMB Circular A-21 (now the Uniform Guidance) imposed the 26% cap on administrative costs that can be recovered under Facilities and Administrative Costs (F&A).

³ Results of the 2017 F&A Survey are [posted here](#), log in required for the survey report and historical rate tables.

- On September 23, 2022, COGR [hosted a webinar](#) on “Digging Into DPIs (Digital Persistent Identifiers) that provided an overview of what DPIs are and how they are used by researchers; how DPIs work (and don’t work) in tracking publications, data sets, and funding; and what the future of compliance looks like when DPIs are used in SciENCv, data management and sharing, and tracking scholarly activities.
- On August 2, 2022, COGR released an update to “[Technology Transfer in U.S. Research Universities: Dispelling Common Myths](#),” which addresses a number of commonly held myths about university technology transfer.
- COGR found long-awaited success in the release of the [OMB 2023 Compliance Supplement](#). For almost a decade, COGR has advocated for a revision to the Compliance Supplement that recognizes an institution is allowed to request cash reimbursement when the expenditure has been incurred on a federal award—and not wait to request the reimbursement on a later date, for example, after a vendor has recognized the payment from the institution. This technicality, which had been problematic in some single audits, is now resolved.

New Members Since August 2022

Now 214 members strong, COGR welcomed 11 new members since August 2022. Collectively, these institutions have over \$795 million in annual federal research expenditures, each playing a significant and critical role as part of the U.S. research enterprise and higher education. We are delighted and proud to welcome these research institutions to COGR!



Farewell and Welcome: COGR Board of Directors Transitions

COGR is pleased to welcome to our [Board of Directors](#) Dr. [Geeta Swamy](#), Associate Vice President for Research/Vice Dean for Scientific Integrity at Duke University, and Dr. [Todd Sherer](#), Associate Vice President for Research/Executive Director, Office of Technology Transfer at Emory University. Their three-year terms started on August 1, 2023. Dr. Swamy will continue to serve on COGR's Research Ethics and Compliance (REC) Committee, and Dr. Sherer will continue to serve on COGR's Research Security and Intellectual Property (RSIP) Committee. We thank them for their increased commitment and service to the COGR community.



*Dr. Geeta Swamy
Duke University*

We also wish to recognize Lynette Arias, Assistant Vice Provost for Research at the University of Washington, and [Twila Reighley](#), Associate Vice President for Research, Sponsored Programs at Michigan State University, whose Board terms ended on July 31, 2023. Over the past several years, Lynette has served on COGR's REC Committee, and Twila has served on COGR's Contracts & Grants Administration (CGA) Committee, and both will continue to do so. Lastly, we recognize Gerald Mauck, Executive Director of Research Administration at the University of Denver, who served on the COGR Board and the Costing and Financial Compliance (CFC) Committee for many years. Jerry retired from the University of Denver in May, and we wish him the best on his next destination. Thank you to Lynette, Twila, and Jerry for their service and their many contributions to the COGR community over the years.



*Dr. Todd Sherer
Emory University*

Presidential Transition

On August 25, 2022, COGR announced President Wendy Streitz would retire in March 2023 after almost 20 years of service to COGR, and more than 25 years in research administration. Wendy began her service to COGR as a member of the Board of Directors in 2005, and as a member and then Chair of the Contracts and Intellectual Property Committee (now the Research Security and Intellectual Property Committee) before being appointed President in 2019.

In her four years as President, the membership grew by more than five percent, she recruited two new directors, and developed a cohesive, small but mighty team, including the creation of an Assistant Director of Membership and Policy position and a new full-time Administrative Officer. Among her most significant accomplishments was the extraordinary leadership she provided through extremely challenging circumstances during the COVID-19 pandemic. We are grateful for her service and wish her well in her retirement.

On January 4, 2023, COGR [announced](#) Matt Owens would join COGR on March 20 as the organization's new President. Matt previously served as the Executive Vice President and Vice President for Federal Relations at the Association of American Universities (AAU), where he was responsible for providing strategic leadership and management to the association's priorities and overseeing AAU's federal relations activities.

Matt served in a multitude of leadership roles at AAU and on various committees and testified before Congress on matters of importance to higher education. Prior to Matt's 20-year career at AAU, he was the Assistant Director of Government and Community Relations at Stanford University. He received a Masters in Public Administration from the University of North Carolina at Chapel Hill and a Bachelor's degree in English from the University of California, Davis.

Emerging Research Institutions Pilot Program – Coming August 2024

COGR is pleased to announce the Emerging Research Institutions (ERI) Pilot Program, which will launch in August 2024. This program will provide an opportunity for institutions that do not yet meet COGR's membership threshold to formally engage with COGR and participate in COGR activities. The ERI Pilot Program aims to provide a pathway for COGR's direct engagement with ERIs. We hope the program will strengthen the totality of the U.S. research ecosystem by providing resources, information, and opportunities for networking across the wide spectrum of research institutions, many of which collaborate with each other through subawards and other projects. Additionally, engagement with ERIs will help support and strengthen COGR's advocacy efforts with federal agencies especially on the cost and administrative burden of complying with research regulations and policies.

Participation in the ERI Pilot Program will be limited. Public and private institutions (including smaller public campuses within state systems) that report less than \$15 million in annual federal research expenditures on the most recently published NSF HERD Survey will be eligible to apply. ERI Pilot institutions may select up to three individuals to receive listserv messages, register for COGR meetings and webinars, and access content in the COGR Portal. The ERI Pilot application process and annual participation fee will be announced during the Summer of 2024.

Please note: Smaller public campuses that have staff on COGR's listservs or have participated in COGR events over the years based on their flagship campus's membership will be invited to apply for the ERI Pilot Program in the Summer of 2024.

Ahead of the ERI Pilot Program launch, a small number of ERIs have agreed to be "beta-testers." This beta-tester group will test the application process, attend at least one in-person COGR meeting and one virtual meeting, and provide feedback about their experiences and suggestions for strengthening the pilot program. We look forward to working with them and to launching the ERI Pilot Program next summer.

A special thank you to past and present members of COGR's ERI Working Group for their efforts in shaping the pilot: Naomi Schrag, (Chair), *Vice President for Research Compliance, Training, and Policy, Columbia University*; Walter Goldschmidts, *Vice President & Executive Director, Cold Spring Harbor Laboratory*; Charles Greer, *Associate Vice Chancellor for Research, University of California Riverside*; Gerald Mauck, *Executive Director of Research Administration, University of Denver (Retired)*; Melissa Mullen, *Director of Sponsored Programs at California State University, Chancellor's Office*; and COGR staff Matt Owens, *President*; David Kennedy, *Costing and Financial Compliance Director*; Toni Russo, *Assistant Director of Member Engagement & Policy*; and former COGR President Wendy Streitz.

More details will be released in the months ahead, but in the meantime, if you have any questions about this program, please contact Toni Russo, Assistant Director of Member Engagement and Policy at trusso@cogr.edu.

COGR on LinkedIn

In May 2023, COGR launched a presence [on LinkedIn](#). In addition to providing a new engagement platform for COGR members, we are using LinkedIn to help elevate COGR's effectiveness in affecting federal research policy and practices. COGR's LinkedIn presence helps amplify our advocacy with key federal agencies by providing an additional avenue to share information and build relationships with federal partners.

We invite you to follow COGR on LinkedIn and stay up to date on COGR's advocacy efforts, upcoming events, joint initiatives with other higher education associations, and more. You can find colleagues to connect with and interact with COGR's content by "liking" and commenting on COGR's posts.



The COGR Portal – Are You In?

Did you know that all staff at COGR Member institutions are eligible (and encouraged!) to sign up for access to the [COGR Member Portal](#) as part of their institution's membership? This allows you to receive COGR's listserv messages, sign up for events, and access members-only materials. In addition, the Portal hosts a complimentary [job board](#), in which COGR member institutions can submit relevant job postings, the [COGR Video library](#), with recordings of past meetings and webinars, a directory of individuals at COGR member institutions, and much more. Sign up today to ensure you stay connected and up to date on the latest.

Federal Register and Agency Comment Letters

COGR comments on proposed new regulations and revisions to existing regulations with a focus on reducing administrative and cost burden and providing federal agencies with expert opinions based on the experiences of our members. These letters are often written in response to official notices of proposed rulemaking, requests for information, or other formal solicitations of input issued by government agencies. However, COGR also proactively sends communications to federal agencies on matters for which a formal comment request was not issued. Whenever possible, draft letters and responses are shared with our members before the deadline, to assist them in the development of their own responses. Over the past year, COGR has submitted over 30 such comment letters, some of which were in partnership with other higher education and research associations.

August 2023

- Support for Educause Response to FAR: Prohibition on a ByteDance Covered Application ([August 2, 2023](#))
- Multi-Organization Statement on Addressing the Shortage of Long-Tailed Macaques for Research ([August 1, 2023](#))

- COGR and AAU Submit Joint Letter on NIH's Levers to Catalyze Technology Transfer ([August 1, 2023](#))

July 2023

- Response to OLAW's RFI on Clarification of Animal Activities Exempt from PHS Policy Requirements for IACUC Review (NOT-OD-23-119) ([July 28, 2023](#))
- Comments to OMB in Response to Request to Provide Data-Driven Evidence to Support Modifications to 2 CFR 200 "Uniform Guidance" ([July 21, 2023](#))
- Response to NASA on RFI Regarding Proposed NASA Grant Application Marking for FOIA Disclosure-Exempt Material Published in the Federal Register ([July 19, 2023](#))
- Joint Association Response to OMB on Comment Request; iEdison System ([July 3, 2023](#))

June 2023

- Comment Letter in Response to Notice to Announce NIH Updated Policy Guidance for Subaward/Consortium Written Agreements ([June 30, 2023](#))
- Response to NSF's Request for Response to Dear Colleague Letter: Development of the U.S. Research Security and Integrity Information Sharing Analysis Organization ([June 27, 2023](#))
- Support for EDUCAUSE Response to NIST's Cybersecurity for R&D Request for Comment ([June 27, 2023](#))
- Response to the National Science Foundation Proposal/Award; Information— NSF Proposal and Award Policies and Procedures Guide (PAPPG) (NSF 24-1) Comment Request ([June 12, 2023](#))
- Joint Association Response to DoEd on Foreign Gifts and Contracts Disclosures ([June 5, 2023](#))

May 2023

- Comment Letter on NSPM-33 Research Security Programs Standard Requirement ([May 30, 2023](#))
- Joint Association Letter on COVID-19 Diagnostics and Therapeutics: Supply, Demand, and TRIPS Agreement Flexibilities ([May 5, 2023](#))

April 2023

- Response to Request for Information (RFI) on Update to NOT-OD-05-034 Guidance on Prompt Reporting of Noncompliances to OLAW (NOT-OD-23-063) ([April 28, 2023](#))
- Response to the NIH Plan to Enhance Public Access to the Results of NIH-Supported Research [NOT-OD-23-091] ([April 24, 2023](#))
- Response to Response to Request for Information (RFI): Re-envisioning U.S. Postdoctoral Research Training and Career Progression within the Biomedical Research Enterprise [NOT-OD-23-084] ([April 14, 2023](#))
- Joint Association Request to OSTP for Listening Sessions on Research Security Programs Standards ([April 13, 2023](#))

March 2023

- Comments to OMB's RFI: Uniform Guidance (2 CFR 200) ([March 13, 2023](#))
- Joint Response to NASA's "New On and Conflict of Commitment Policy for Recipients of NASA Financial Assistance Awards" ([March 8, 2023](#))
- Comments in Response to ANPRM Entitled Wild and Exotic Animal Handling, Training of Personnel Involved with Public Handling of Wild and Exotic Animals, and Environmental Enrichment for Species ([March 6, 2023](#))

February 2023

- Multi-Association Letter to DoEd Regarding Foreign Gift & Contract Disclosures (ED-2022-SCC-0159) ([February 27, 2023](#))
- Comments to GSA Regarding the Transition of the Federal Audit Clearinghouse ([February 21, 2023](#))
- Request to OMB for 30 Day Extension to Respond to OMB's RFI ([February 21, 2023](#))

January 2023

- Response to the Request for Information: Clinical Research Infrastructure and Emergency Clinical Trials ([January 23, 2023](#))
- Response to HHS Notice of Proposed Rulemaking "Confidentiality of Substance Abuse Disorder Patient Records" ([January 23, 2023](#))

December 2022

- Letter to HHS on Timely Establishment of Indirect Cost and Fringe Benefit Rate Agreements ([December 14, 2022](#))
- Letter to Dr. Tabak on the NIH Modular Grant Application and Award Process ([December 8, 2022](#))

November 2022

- Comments to the Small Business Administration in Response to Federal Register Notice on Ownership and Control and Contractual Assistance Requirements for the 8(a) Business Development Program ([November 8, 2022](#))

October 2022

- Joint Association Comments to NSF in Response to Request for Comment Regarding Common Disclosure Forms for the Biographical Sketch and Current and Pending (Other) Support ([October 31, 2022](#))
- Letter to NSF on Common Disclosure Forms for the Biographical Sketch and Current and Pending (Other) Support ([October 31, 2022](#))
- COGR and ARIO Response to ORI Request for Comment on Research Misconduct Policies ([October 30, 2022](#))
- Joint Association Comment Letter to NIH on Cannabis RFI (NOT-AT-22-026) ([October 15, 2022](#))

August 2022

- Comments to OHRP in Response to HHS-OASH-2022-0011 "Use of a Single IRB for Cooperative Research" Draft Guidance ([August 30, 2022](#))
- Multi-Association Follow Up Letter to DoEd on Section 117 ([August 16, 2022](#))

Resources for Members

In addition to the topical resources discussed above, COGR distributes a digest of news relevant to the administration of research three times a week. Our meetings, both virtual and in-person, are open to members only and select invited guests. COGR holds two in-person meetings in Washington D.C. and one virtual meeting each year, and [slides and recordings](#) are posted for attendees. In addition, we offer webinars on current issues throughout the year. Several times per year, COGR provides its membership with [updates of current issues and hot topics](#), with the most recent being our [June 2023 Update](#). Members are always welcome to [contact COGR staff](#) to discuss issues of concern or get the latest information.

If you have any questions about this document or services COGR provides its membership, please contact memberservices@cogr.edu.