



## WHO WE ARE

COGR is an association of 220 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 over 90% of all R-1 universities, 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 efficient, effective, and harmonized regulations that safeguard research and minimize administrative and cost burdens.

## President's Message 2024: 75 Years - Indispensable & Evolving

We celebrated COGR's 75<sup>th</sup> anniversary this past fiscal year (Aug. 1, 2023 – July 31, 2024). We recognized our origins as a committee of NACUBO, a history of achievements, and the organization as we know it today – an indispensable association of over 200 research institutions in which a professional staff works closely with volunteer experts who comprise our four standing committees and board of directors. We also affirmed our resolve to use our expertise to advocate for effective, efficient, and harmonized federal research policies and regulations.

COGR's history parallels that of the research partnership between the federal government and research institutions. As the partnership continues to evolve and mature, so does COGR. Today, our work is as important as ever to the strength of the partnership and its consequences for our nation's health, security, and economic prosperity.

In the past year, we went “all in” to share our members' ideas and concerns to help positively shape proposed new research security requirements and updates to the Uniform Guidance. We did this while also addressing a significant number of new and significantly changed policies and regulations affecting research. All of these are included in the most recent update to COGR's *Aggregated Regulatory Requirements Impacting Federally Funded Research Since 1991* ([Aug. 2024](#)). The charts in this document illustrate the costly regulatory burden saddling research institutions and straining the partnership.

COGR continued to grow as an organization over the past year. We welcomed 7 new member institutions that further diversified and strengthened the association. We launched the [Emerging Research Institutions \(ERI\) Pilot Program](#) this summer, based on what we learned during a “soft-pilot” over the past year. The ERI Pilot will help us understand how the association can effectively serve the needs of all research institutions.

We also began an initiative to elevate COGR's brand and sharpen how we talk about who we are, what we do, and why it matters to research and the nation. Elevating the COGR brand is important to effective advocacy in the noisy policy and political environments in which we work. Informed by a member survey in May, this initiative is ongoing and will include a refreshed mission statement and visual identity.

I hope you will take 10 minutes to review this Year in Review and how COGR serves its members. Thank you to the volunteers who served on the Board of Directors, the CFC, CGA, REC, and RSIP committees, and the various working groups over the past year. Your time and expertise were vital to not only COGR's work, but our collective cause. Thank you all for your institution's membership and your continued support.

Matt Owens  
President



# 2023-2024 Year in Review

*As an association of 220 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. COGR’s success depends on the support of our member institutions and 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](#).  
To learn more about COGR’s Emerging Research Institutions (ERI) Pilot Program [click here](#).*

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## Research Security

Research security remained a major focus for funding agencies as they worked to implement the mandates of National Security Presidential Memorandum 33 ([NSPM-33](#)) and the [CHIPS and Science Act of 2022](#). The National Science and Technology Council's (NSTC) Research Security Subcommittee issued [common disclosure forms](#) for the biographical sketch and current and pending support sections on applications for federal research and development grants and cooperative agreements, and the Office of Science and Technology Policy (OSTP) issued guidance to agencies on their implementation.

In consultation with NSTC, OSTP issued the long-awaited guidelines for research security programs at covered institutions for federal funding agencies, and NSF released the training modules that can be used to satisfy research security training requirements. NSF also established its electronic portal for Foreign Financial Disclosure Reports with initial reports due by July 31, 2024 (with a one-time grace period until September 3, 2024) and began implementation of its risk assessment and mitigation program – Trusted Research Using Safeguards and Transparency (TRUST). Other research funding agencies, including NASA, Department of Defense (DOD) units, and the Department of Energy, also took research security related actions including requirements/proposed requirements for conflict of interest/commitment disclosures and risk assessment/mitigation processes.

COGR closely monitored efforts in this area, participated in agency listening sessions, and submitted comments concerning agencies' proposed rule-making notifications and requests for information. More detailed descriptions of these activities can be found in this report and on COGR's [Science and Security webpage](#). COGR also conducted a survey to gather information about member institutions' experiences with DOD components that applied the DOD matrix to fundamental research proposals and the results are outlined in [Research Institutions Response to Risk Mitigation Plans](#) (April 2024).

In addition to regular coverage in meetings and COGR Updates<sup>1</sup>, some of the steps COGR took to help its members were:

- Continued updates on the Quick Reference Table of Current and Upcoming Federal Research Security Requirements table ([August 13, 2024](#))
- Continued updates on the COGR Matrix of Science & Security Laws, Regulations, and Policies ([August 13, 2024](#))
- Released an Overview of OSTP Guidelines for Research Security Programs at Covered Institutions ([July 15, 2024](#))
- Published the results from COGR's Survey on Research Institutions' Experiences with DoD Policy for Risk-Based Security Reviews of Fundamental Research ([April 2024](#))<sup>2</sup>
- COGR's survey on the HHS OIG Monetary Donations that Support Research Survey ([February 2024](#))

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<sup>1</sup> 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>

<sup>2</sup> Update currently in development

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- Provided an analysis of NIST’s Safeguarding International Science Research Security Framework ([October 11, 2023](#))
- Held a workshop on Compliance with Research Security Requirements and the Associated Cost of Compliance Survey ([September 27, 2023](#))
- Hosted a webinar Times Up for TikTok –Implications of the Prohibition on ByteDance Covered Application [FAR 52.204-27] (September 6, 2023)
- Several key comment letters to federal agencies (see comment letter section)

## Office of Management and Budget Final Guidance for Federal Financial Assistance

COGR remains at the forefront, intently involved in all things Uniform Guidance. As respected national experts, we play a major role in shaping the Uniform Guidance, now the [Guidance for Federal Financial Assistance](#), published on April 22, 2024. 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 it remains true today.

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*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.*

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The Final Guidance brings new changes, including updated thresholds (e.g., Equipment/Supplies, subaward MTDC, *De minimis*, Single Audit Requirement, Fixed Amount Awards), new requirements for fixed amount awards, standardization of NOFOs, and much more. As we approach the October 1, 2024 the effective date of the Final Guidance, we continue to advocate for issues important to our community. We are engaging OMB on outstanding issues our community identified that need critical adjustments and technical corrections (e.g., fixed amount awards, timely implementation of thresholds, fair share, and more).

COGR continues to provide detailed analyses through our “Look Series,” launched in the spring of 2024. COGR’s [Uniform Guidance Resource Page](#) is continually updated with comment letters, publications, and other helpful materials.

In addition to regular coverage in Membership Meetings and COGR Updates<sup>3</sup>, some of the steps COGR took to help its members included:

- COGR CFC and CGA Directors, David Kennedy and Krystal Toups met with OMB leaders Deidre Harrison, Deputy Controller, and Steve Mackey, Policy Analyst, to advocate for COGR’s technical corrections (August 7, 2024)

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<sup>3</sup> 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>

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- Fourth Look – COGR Submits Technical Corrections and Other Comments to OMB on Guidance for Grants & Agreements ([June 28, 2024](#))
- Third Look: COGR Meeting – [Final OMB Guidance for Federal Financial Assistance, What’s Next?](#) OMB leaders Deidre Harrison, Deputy Controller, and Steve Mackey, Policy Analyst, provided additional insights and responded to [questions](#) from the membership. (June 6, 2024)
- Hosted a webinar in May on “A Second Look at the Final OMB Guidance for Federal Financial Assistance” ([May 14, 2024](#))
- Released “OMB Guidance for Federal Financial Assistance – A First Look” ([April 24, 2024](#))
- COGR CFC and CGA Directors, David Kennedy and Krystal Toups met with OMB leaders Deidre Harrison, Deputy Controller, and Steve Mackey, Policy Analyst, to discuss the logistics of the 2 CFR rollout and advocate for COGR priorities (fair share, implementation challenges, and FAQs). (April 11, 2024)
- COGR Responds to OMB's NPRM on Guidance for Grants & Agreements ([December 4, 2023](#))

## F&A Challenges, Wins, and Other Developments

They say there are two sure things in life – death and taxes. Maybe we should add “F&A developments” to the list. The second half of 2023 and the first half of 2024 included new threats and challenges to the F&A landscape.

Last fall, Cost Allocation Services (CAS) implemented a new policy that required adjustments be made to indirect cost pools for salaries exceeding the Executive Level II (NIH, HHS) salary cap. The genesis was based on a finding in an HHS OIG report, [Cost Allocation Services Needs to Update its Indirect Cost Rate Setting Guidance](#) (see p. 23). COGR worked closely with the [Association of Independent Research Institutes](#) to reverse this policy via engagement with the [HHS Office of Grants](#) and the [OMB Office of Federal Financial Management \(OFFM\)](#). To date, we are still awaiting official word that this policy has been permanently revoked – though for now, the reversal is an important win for COGR members.

More recently, we have paid attention to legislative developments in Congress. In May, the *No Subsidies for Wealthy Universities Act* was proposed by [Sen. Mike Lee \(R-UT\)](#) and [Rep. Ben Cline \(R-VA\)](#). The bill would eliminate indirect costs reimbursements on grants for universities with endowments over \$5 billion, cap reimbursements to 8 percent for universities with endowments between \$2-\$5 billion, and cap reimbursements at 15 percent for all others. The bill also would require reporting on federal funds used towards administrative and DEI staffing. While concerning, the assessment by our partner associations – AAU, APLU, AAMC, and AIRI – is that this bill is unlikely to advance this year.

However, in a new development, the House Appropriations Committee released their FY2025 bill for the Labor, Health and Human Services, Education, and Related Agencies Subcommittee. Included in the bill is the following provision: *SEC. 237. None of the funds made available by this Act to the National Institutes of Health may be used for facilities and administration costs ... that exceed 30 percent of an award to an applicable educational institution that is an organization subject to taxation under section 4968 of the Internal Revenue Code of 1986.* We are working closely with our partner associations to refresh educational materials on F&A cost reimbursements and to inform their efforts to preempt this concerning legislation.

COGR resources such as [Excellence in Research: The Funding Model, F&A Reimbursement, and Why the System Works](#) (April 2019) and [Finances of Research Universities](#) (June 2014) remain relevant and informative to the role and importance of F&A cost reimbursement. In addition, COGR's 2023 F&A Survey has provided the membership with a resource to benchmark and review the broad F&A landscape. The [2023 F&A Survey Report page](#) (login required) includes three reports from the survey: 1) F&A Cost Rates by Institution, 2) Off-Campus / MTDC Definitions by Institution, and 3) Summary of Responses to the Survey.

COGR's work and advocacy in support of a reliable and fair F&A cost reimbursement model will continue into our next fiscal year. We expect to present the "F&A Capstone" – a deep-dive analysis on F&A cost rates, cost reimbursement, and related topics – at the October 24-25, 2024 COGR Meeting. The Capstone will build on the 2023 F&A Survey and previous presentations at the [June 2023](#) and [October 2023](#) COGR meetings.

## Additional Highlights and Accomplishments

- In August 2024, COGR published its [annual update](#) of the "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).
- On May 28, COGR hosted its first "Meet the Committees" Open House: Knock Knock, Who's There? It's REC! featuring the Research Ethics and Compliance Committee. Attendees heard from REC Director Kristin West and Committee Chair Deborah Motton on key issues the committee is focusing on this year and had an opportunity to ask questions. Our next "Meet the Committees" will feature the Contracts and Grants Administration (CGA) committee this fall. Registration will open via the listserv, we hope to see you there!
- On November 14, amidst of much uncertainty in the federal government, COGR published "[Considerations When Preparing for the Federal Government Shutdown](#)" to assist institutions in thinking through considerations to manage federally sponsored projects in the likelihood of a government shutdown.



## 75 Years Strong: COGR Celebrated its 75<sup>th</sup> Anniversary in 2023

COGR celebrated its 75<sup>th</sup> Anniversary during our October 26-27, 2023, meeting in Washington D.C. Originally a standing committee in what is now the National Association of College and University Business Officers ([NACUBO](#)), COGR began operating as an independent organization in 1994 and today has a membership of 220 of the most research-intensive institutions in the U.S.

A very special thank you to the following individuals who participated in the anniversary celebration. The perspectives, stories, and rich history they shared made the evening incredibly special.

### COGR Board Chairs<sup>4</sup>:

- **Fred Rogers**<sup>5</sup>, VP & Treasurer Emeritus, Carleton College (1998-1999)
- **MaryEllen Sheridan**, Associate Vice President for Research, University of Chicago *Retired* (2002-2004)
- **Jane Youngers**, Assistant VP for Research Administration, UT- HSC San Antonio *Retired* (2006-2008)
- **Jim Luther**, University Research Compliance Officer, Yale University (2015-2017)
- **David Norton**, Vice President for Research, University of Florida, (2020-2022)
- **Jeffrey Silber**, Senior Director, Sponsored Financial Services, Cornell University (2022-2024)



### COGR Presidents:

- **Kate Phillips**, 2000-2005
- **Tony DeCrappeo**, 2005-2018
- **Wendy Streitz**, 2019-2023
- **Matt Owens**, 2023-Present

In addition, COGR enjoys close relationships with many [key partner organizations](#). Together we serve our members in the research community. We were honored to have representatives from several of these organizations share their thoughts about COGR and its impact. Thank you to Tobin Smith, Association of American Universities (AAU); Deborah Altenburg, Association of Public and Land-grant Universities (APLU); Stephen Susalka, AUTM; Jarret Cummings, EDUCAUSE; and Kelvin Droegemeier, University of Illinois Urbana-Champaign for your partnership and for contributing to COGR's 75<sup>th</sup> Anniversary Video: *Reflections on a Dynamic Association*. The video was shown during the presentation and is available on [COGR's website](#).

You can watch the full anniversary [presentation here](#).

Cheers to 75 years!

<sup>4</sup> For a full list of COGR Board Chairs and Presidents, see: <https://www.cogr.edu/history>

<sup>5</sup> Formerly Sr. Vice President & CFO Emeritus, Cornell University

### New Members Since August 2023

Now 220 members strong, COGR welcomed 7 new members since August 2023. Collectively, COGR institutions boast over \$49 billion in annual federal research expenditures, and each institution plays an important role as part of the U.S. research enterprise and higher education. We are delighted and proud to have welcomed these research institutions to COGR in the past year.



### Thank you and Welcome: COGR Board Chair Transitions

COGR is pleased to welcome Naomi Schrag, Vice President for Research Compliance, Training & Policy of Columbia University as Chair of the Board of Directors. Ms. Schrag began her term as Chair on August 1, 2024, and has served on the COGR Board of Directors since 2020. She has also previously served as the Chair of COGR’s Research Ethics & Compliance Committee.



Naomi Schrag  
Columbia University

We also wish to thank Jeffrey Silber, Senior Director, Sponsored Financial Services, of Cornell University, who concluded his service as COGR Board Chair July 31, 2024. Mr. Silber has served as Chair since 2022, and on the Board of Directors since 2017, and will continue to serve as a member of the Costing and Financial Compliance (CFC) Committee. In addition, Mr. Silber will serve as an *ex-officio* member of the COGR Board of Directors.



Jeffrey Silber  
Cornell University



## Farewell and Welcome: COGR Board of Directors & Committee Chair Transitions

COGR is pleased to welcome to our [Board of Directors Stephanie Gray](#), Assistant Vice President & Director, Division of Sponsored Programs, University of Florida; [Vivian Holmes](#), Executive Director, Research Administration Services, Massachusetts Institute of Technology; and Craig Reynolds, Vice President for Research Protections, Van Andel Institute. Their three-year terms started on August 1, 2024. Ms. Gray will continue to serve on COGR’s Contracts and Grants Administration (CGA) Committee, Ms. Holmes will transition from service on the CGA Committee to the Costing and Financial Compliance (CFC) Committee, and Mr. Reynolds will continue service on CGA Committee. We thank them for their increased commitment and service to the COGR community.



Stephanie Gray  
University of Florida



Vivian Holmes  
Massachusetts  
Institute of Technology

We also wish to recognize [Jeffrey Friedland](#), Associate Vice President for Research Administration, University of Delaware, whose Board term ended on July 31, 2024. Over the past several years, Jeff has served on COGR’s CGA Committee, including service as CGA’s Committee Chair from 2022-2024. Jeffrey will be succeeded in his role as chair by Stephanie Endy, Associate Vice President for Research, Brown University, who has served on CGA since 2015. Thank you to Jeff for his service and many contributions to the COGR community over the years.



Craig Reynolds  
Van Andel Institute

In addition, Deborah Motton, Executive Director, Research Policy Analysis & Coordination, University of California President’s Office began her role as the Research Ethics & Compliance (REC) Committee Chair in 2023. Deborah has served on the REC Committee since 2021 and we thank her for her increased commitment and service on REC.

## At-Large Committee Member Transitions

We are pleased to announce the following individuals will begin service as at-large members of one of COGR’s four standing committees. COGR committees are true working committees, and its members volunteer their wide range of expertise and significant amount of time in developing COGR’s comment letters, publications, analysis, presentations, and more.

### Contracts & Grants Administration (CGA)

- **Maggie Ewell**, Director, Pre-Award Administration, George Mason University

### Costing and Financial Compliance (CFC)

- **Casey Erickson**, Assistant Vice President, Sponsored Programs Finance, University of Washington (beg. April 2023)

### Research Ethics & Compliance (REC)

- **Jonathan Miller**, Associate Vice President for Research Regulatory Oversight, University of Alabama Birmingham
- **Tracy Wilson-Holden**, Assistant Vice President, Research Integrity, Case Western Reserve University

### Research Security & Intellectual Property (RSIP)

- **Thomas Burns**, *Associate Vice Provost and Deputy Chief Compliance Officer for Research, Johns Hopkins University*
- **Kelly Hochstetler**, *Associate Vice President for Research Operations, Compliance & Policy, University of Virginia*
- **David Winwood**, *Vice President, Technology Transfer and Commercialization, Wake Forest University Health*

In addition, we thank the following committee members for their many years of service and countless contributions to one or more of COGR's four standing committees.

- **Alexandra Albinak**, *Associate Vice Provost for Research Administration, Johns Hopkins University (Research Security & Intellectual Property Committee, former COGR Board member and former RSIP Chair)*
- **Lynette Arias**, *Co-Director, SECURE Center, University of Washington (Research, Ethics, & Compliance Committee and former COGR Board member)*
- **Joseph Gindhart**, *Associate Vice Chancellor for Research and Sponsored Projects, Washington University at St Louis (Costing and Financial Compliance Committee, former COGR Board member and former CFC Chair)*
- **JR Haywood**, *Assistant Vice President for Research and Innovation, Michigan State University, Retired (Research Ethics & Compliances Committee)*
- **Elizabeth Peloso**, *Associate Vice Provost/Associate Vice President for Research, University of Pennsylvania (Research Security & Intellectual Property Committee, former COGR Board member and former RSIP Chair)*
- **John Ritter**, *Executive Director, Office of Technology Licensing, Princeton University (Research Security & Intellectual Property Committee)*

A full list of current COGR Committee members can be found on COGR's [website here](#). Those who are interested in volunteering with COGR, including for service on COGR committees, working groups, and in other capacities, are encouraged to complete [COGR's Volunteer Survey](#).

### Staff Updates

This has been a dynamic year for the COGR staff team, including transitions, retirements, and promotions. So much of COGR's success is due to its 'small but mighty' team, and the team is as strong as ever.

During the COGR June 6-7 meeting in Washington D.C., we had the opportunity to recognize and congratulate Robert Hardy on 23 years as the Director of Research Security and Intellectual Property (formerly Contracts and Intellectual Property), and David Kennedy for his 18 years of service as the Director of Costing and Financial Compliance. Thank you to all that joined COGR in celebrating Bob and Dave in June. As previously announced, Dave has transitioned to the role of Senior Fellow in which he will focus on specific projects on behalf of COGR through January 2025.



Kevin Wozniak  
RSIP Director

On May 28, we welcomed Kevin Wozniak to the COGR staff as the new Research Security & Intellectual Property Director. Kevin has been closely engaged with COGR over many years, including service on the COGR Board of Directors from 2011-2020, and service on the (then) Contracts & Intellectual Property Committee (CIP, now RSIP) from 2010-2021. Previously serving as the Executive Director of Sponsored Programs at Georgia Tech, Kevin brings with him over 25 years of university and industry experience and leads COGR’s research policy efforts as the lead staff for the [RSIP Committee](#) in a wide range of areas associated with research security, intellectual property, cybersecurity, innovation, and technology transfer.



Cindy Hope  
CFC Director  
(beg. 9/3)

As announced in June, on September 3, 2024, we will welcome Cynthia Hope as COGR’s next Director for Costing and Financial Compliance. Currently, Cindy serves as the Associate Vice President for Research Administration at Georgia Tech. She has been closely engaged with COGR over many years, including service on the COGR Board of Directors from 2012-2020, and service on the (then) Costing Policies Committee (now CFC Committee) from 2010-2022. She also chaired the Costing Policies Committee from 2017-2020. Cindy brings with her over 25 years of research administration experience and will lead COGR’s research policy efforts as the lead staff for the [CFC Committee](#) on policy efforts in a wide range of areas associated with research costing, financial compliance, federal payments systems, and facilities and administrative (F&A) cost reimbursement.



Toni Russo  
Chief Operating  
Officer

Additionally, on August 1, Toni Russo, previously the Assistant Director of Member Engagement & Policy, began her new role as COGR’s Chief Operating Officer. In this role, Toni will continue to oversee membership matters, COGR events, coordinate internal and external communications, support the President by managing daily operations, and will oversee financial management of the association. In addition, the Board of Directors appointed Toni as the association’s Secretary, an officer position required by COGR’s bylaws.

## Emerging Research Institutions Pilot Program – Now Accepting Applications

COGR launched an Emerging Research Institutions (ERI) Pilot Program on August 1, 2024. This program provides an opportunity for institutions that do not yet meet COGR’s membership threshold<sup>6</sup> to formally engage with COGR and participate in association 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,

<sup>6</sup>To be eligible for COGR membership, institutions be a doctoral degree granting institution and must report at least \$15M in annual federal research expenditures on the most recently published NSF HERD (or equivalent), or have a formal affiliation with a COGR member institution that does. Institutions that report less than \$15M on the NSF HERD may apply for limited openings in the ERI Pilot Program.

## Thank you COGR ERI Working Group Members

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,** *Chief Operating Officer;* and former COGR President **Wendy Streitz.**

engagement with ERIs helps support and strengthen COGR’s advocacy, especially with respect to federal compliance burden and costs. *Please note: Smaller public institutions that have staff on COGR’s listservs or have participated in COGR events over the years based on their flagship campus’s membership are invited to apply for the ERI Pilot Program if they wish to continue to participate in COGR activities.*

### Key ERI Pilot Program Information:

- **Eligibility:** *Institutions of higher education reporting less than \$15 million in annual federal research expenditures on the NSF HERD survey are eligible to apply. As there is limited capacity, applications will be considered using a variety of factors to ensure diversity among participating ERI Pilot Institutions.*
- **Pilot Duration:** *The initial duration of the Pilot Program will be two years and coincides with COGR’s fiscal year. Year 1 runs August 1, 2024 - July 31, 2025. Year 2 will be August 1, 2025 - July 31, 2026. The Pilot Program will be evaluated in the spring of 2025 for potential extension, transition, or completion.*
- **Annual Fee:** *The annual participation fee for the initial phase of the pilot is \$3,500 per year, per institution.*
- **What’s included?** *ERI Pilot Institutions may have up to five representatives. Each will have access to the COGR Portal. One representative per institution is permitted to register for in-person Membership Meetings. All representatives may register for virtual Membership Meetings and webinars. In-person meeting registration is currently \$550 per person and virtual meeting registration is approximately \$300 per person, or \$250 per person if registering five or more. ERI Pilot institutions are also highly encouraged to participate in COGR surveys, working groups, and other opportunities to engage that may arise.*
- **What is not included?** *Participation in the ERI Pilot Program does not constitute membership in COGR. Representatives from ERI Pilot Institutions are ineligible to serve on the COGR Board of Directors or on one of COGR’s four standing committees. However, representatives from ERI Pilot Institutions are eligible to serve on working groups. To facilitate this, at least one representative from each ERI Pilot Institutions will be asked to complete a volunteer form to identify areas and issues of interest.*



Though ERI Pilot Program participation does not constitute COGR membership, once an ERI Pilot Institution becomes eligible for membership<sup>7</sup>, the institution will be invited to apply for membership for the following fiscal year. Please note: There is a limited number of openings in the first year of the Pilot Program (August 1, 2024 - July 31, 2025). Institutions not selected in the first year are encouraged to apply in year two of the program. COGR will host a webinar on the Pilot Program for interested and participating institutions in the coming months, and details will be sent to the COGR listserv and on COGR’s website.

ERI Pilot Program Application

ERI Pilot Program Trifold Brochure

Contact [ERIservices@cogr.edu](mailto:ERIservices@cogr.edu) with any questions related to the ERI Pilot Program.

Participating ERI Pilot Institutions

We are thrilled to announce the following institutions have already been accepted into COGR’s ERI Pilot Program. Applications are still being accepted for limited openings in the Pilot, and applications received by September 30 will be given priority consideration. Institutions can [apply here.](#)



<sup>7</sup> At least \$15 million in annual federal research expenditures as reported in the most recently published NSF HERD survey or equivalent and be a doctoral degree granting institution or have a formal affiliation with a COGR member institution that does.



## COGR on LinkedIn

In May 2023, COGR launched a presence [on LinkedIn](#). In addition to providing an additional 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.

**COGR Portal  
Request Access Here**

## COGR Has Moved – Update Your Institutional Records!

As previously announced, COGR has moved. As of January 1, 2024, COGR's new physical and mailing address is:

**COGR  
601 13th Street NW 12th Floor  
Washington DC 20005**

If you are your institution's Primary Representative and/or Billing Contact, please ensure your institutional records have been updated to reflect our new address.

***Invoices for FY 25 (August 1, 2024-July 31, 2025) are now available*** in the COGR Portal and reflect the new address. As the PR or billing contact, you can log into the COGR Portal, click the gray renewal badge, and download your invoice once you update your contact information. As a reminder, COGR accepts annual institutional dues payments via check payment or EFT/ACH.

An updated W-9 is [available here](#). If you need institutional forms updated, and/or would like to set up EFT/ACH payments, please reach out to [memberservices@cogr.edu](mailto:memberservices@cogr.edu) now and allow for additional processing time.

Please reach out to [memberservices@cogr.edu](mailto:memberservices@cogr.edu) if you have any questions and thank you for your institution's membership!

### Thank you for Hosting: Campus Visits in FY 24

Over the past year, President Matt Owens has had the honor of visiting 23 member (and potential member) campuses. These visits help inform the agenda and work of the association. Sometimes joined by members of the COGR staff, he met with senior leadership, discussed issues in which COGR is closely engaged, and had the opportunity to hear about issues that are top of mind from research administrators from across the U.S.

COGR is deeply grateful to the following institutions (in visit order) for hosting and engaging in thoughtful and insightful discussions. COGR member institutions directly support the work of the association and COGR staff look forward to visiting more campuses in the upcoming year.

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*Johns Hopkins University*  
*University of Washington*  
*Allen Institute*  
*Washington State University*  
*University of Idaho*  
*University of Nevada Las Vegas*  
*Northern Arizona University*  
*Arizona State University*  
*University of South Florida*  
*University of Central Florida*  
*University of Florida*  
*Colorado School of Mines*

*University of Pittsburgh*  
*Emory University*  
*Georgia State University*  
*University of Oklahoma*  
*Oklahoma State University*  
*Iowa State University*  
*University of Iowa*  
*University of Colorado Boulder*  
*University of South Alabama*  
*University of Montana<sup>8</sup>*  
*Montana State University*

### 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

<sup>8</sup> Potential member institution

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 30 such comment letters, some of which were in partnership with other higher education and research associations.

### July 2024

- Comments to OSTP on NASA’s Biosketch and Current and Pending Support Disclosure Policy ([July 30, 2024](#))
- Comments to NIH on Intramural Research Program Policy: Promoting Equity Through Access Planning ([July 22, 2024](#))
- Response to NIH Proposed Collection of Post-Award Reporting Requirements ([July 19, 2024](#))
- Joint Comment Letter with AAMC to DEA on Rescheduling of Marijuana ([July 12, 2024](#))

### June 2024

- Response to OMB on Proposed Technical Corrections & Other Comments to OMB’s Guidance for Federal Financial Assistance ([June 28, 2024](#))

### May 2024

- Response to CMMS RFI on Research Data Request and Access Policy Changes ([May 14, 2024](#))
- Joint Response with AAU to OSPTO on Unlocking the Full Potential of Intellectual Property by Translating More Innovation to the Marketplace ([May 14, 2024](#))

### April 2024

- Response to DoJ on NRPM “Provisions Regarding Access to Americans’ Bulk Sensitive Personal Data and Government-Related Data by Countries of Concern ([April 17, 2024](#))
- Joint response with the Association of Independent Research Institutes (AIRI) to OMB on Treatment of Salaries and the Executive Level II Salary Limitation ([April 2, 2024](#))

### March 2024

- Response to Centers for Disease Control and Prevention (CDC) NPRM on Possession, Use, and Transfer of Select Agents and Toxins; Biennial Review of the List of Select Agents and Toxins ([March 27, 2024](#))
- Response to the Animal and Plant Health Inspection Service (APHIS), USDA NPRM on Agricultural Bioterrorism Protection Act of 2022, Biennial Review and Republican of the Select Agent and Toxin List ([March 27, 2024](#))

### February 2024

- Multi-association response with ACE, AAU, APLU, and Educause to DoD on the Cybersecurity Maturity Model Certification (CMMC) Program ([February 26, 2024](#))
- Comments to the Environmental Protection Agency (EPA) on its draft Scientific Policy ([February 21, 2024](#))
- Multi-association comments to the General Services Administration (GSA) on FAR Case 2021-017

“Federal Acquisition Regulation: Cyber Threat and Incident Reporting and Information Sharing” ([February 2, 2024](#))

- Multi-association response with AAU, APLU, AAMC, ACE, and AUTM to NIST on RFI regarding the draft Interagency Guidance Framework for Considering the Exercise of March-In Rights ([February 1, 2024](#))
- Response to NIST (COGR stand-alone letter) regarding the RFI on regarding the draft Interagency Guidance Framework for Considering the Exercise of March-In Rights ([February 1, 2024](#))

### January 2024

- Comments & Extension Request to Office of Evaluation and Inspections, OIG, HHS on NIH Monetary Donations that Support Research Survey ([January 30, 2024](#))
- Multi-association letter with AAU and APLU to NSF regarding NSF’s Public Access Plan 2.0 ([January 19, 2024](#))

### December 2023

- Multi-association letter with AAU, APLU, AAMC, ACE, and AUTM to request an extension to responds to the RFI Regarding the Draft Interagency Guidance Framework for Considering the exercise of March-In Rights ([December 21, 2023](#))
- Response to Request for Information (RFI) on Proposed Guidance to Assured Institutions on Cephalopod Care and Use ([December 20, 2023](#))
- Comments to the Office of Research Integrity’s (ORI) NPRM on Policies on Research Misconduct ([December 12, 2023](#))
- Joined C4IP on letter to President Joe Biden opposing the WTO’s proposed waiver of intellectual property rights for COVID-19 therapeutics and diagnostics ([December 4, 2023](#))
- Response to OMB on Guidance for Grants and Agreements ([December 4, 2023](#))

### October 2023

- Multi-association request with AAU, AAMC, APLU, and ARIIO to request an extension to respond to ORI’s NPRM on Public Health Service Policies on Research Misconduct ([October 23, 2023](#))
- Response to Request for Information (RFI) on an Update to the Current OLAW Guidance Disclaimer ([October 19, 2023](#))
- Response to Request for Information on Potential Changes to the Policies for Oversight of Dual Use Research of Concern (DURC) and the Potential Pandemic Pathogen Care and Oversight (P3CO) Policy Framework ([October 13, 2023](#))
- Response to Request for Information (RFI) on Flexibilities for Streamlining IACUC Review of Protocols and Significant Changes ([October 6, 2023](#))
- Response to Proposed Amendments to the NIH Guidelines for Research Involving Recombinant or Synthetic Nucleic Acid Molecules ([October 6, 2023](#))

### September 2023

- Multi-association comments with AAU and APLU to NSF on Common Disclosure Forms for the

Biographical Sketch and Current and Pending (Other) Support for Use in Submission of Research Applications ([September 11, 2023](#))

### August 2023

- Response to July 27, 2023, Request for Information Concerning Cannabidiol ([August 17, 2023](#))

## Resources for Members & Pilot Institutions

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, a representative from each of our ERI Pilot Institutions, 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 [July 2024 Update](#). Members and ERI Pilot Institutions 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](mailto:memberservices@cogr.edu).*

*If you are an ERI Pilot Institution Representative, please contact [ERIservices@cogr.edu](mailto:ERIservices@cogr.edu).*