



2024-2025

Year In REVIEW

COGRSM

Advancing Effective Research Policy



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202-289-6655

Chair & President's Message 2025: A Year of Uncertainty & Resilience

Dear Colleagues:

This past fiscal year (Aug. 1, 2024 – July 31, 2025) has been an extraordinary time for COGR as our member institutions confront numerous, unprecedented, and existential federal policy threats affecting their ability to perform research. As the partnership between research institutions and the federal government is under great duress, COGR's work is vital to its future and the ability of our member institutions' research and educational contributions to our nation's health, security, and economic prosperity.



Naomi Schrag
Columbia University,
COGR Board Chair

This past year, we adopted new mission, purpose, and impact statements that shaped an updated logo and a tagline that captures the essence of our work: Advancing Effective Research Policy. Among many other activities this past year, COGR brought this ethos to our advocacy efforts on:



Matt Owens
President, COGR

- new policies by four federal agencies capping rates for facilities and administrative costs,
- the “pause” and terminations of federal research awards,
- new “defend the spend” and other cumbersome and duplicative requirements,
- updates to federal research integrity rules, and
- recommendations for reducing red tape affecting federally sponsored research.

In each of our endeavors, we have sought to raise our game and help our members meet the challenges before us. We have published new tools and resources, filed amicus briefs with partner organizations, and elevated the association's engagement with policymakers, the research community, and the media on core COGR issues. COGR's four standing committees have intensified their efforts and have been convening jointly on a regular basis to share information and discuss strategy and actions for COGR's activities and advocacy. Moreover, in addition to our three regular membership meetings, over the past six months we created the COGR Forum virtual meeting series. COGR Forums are open to all members to raise and discuss the latest policy and advocacy developments and to periodically delve deeper into specific issues of interest.

At the same time, COGR continued to grow as an organization during the past year. We welcomed 15 new member institutions that further diversified and strengthened the association and its voice. We also completed the first year of the Emerging Research Institutions (ERI) Pilot Program in which 15 institutions participated, and we are pleased to welcome four new institutions as year two of the pilot starts.

As you read this Year in Review, we ask you to bear in mind all the volunteers who served on the Board of Directors, the CFC, CGA, REC, and RSIP committees, session panels, and the various working groups over the past year. Their time and expertise were vital to not only COGR's work, but our collective cause to advance effective research policy.

Thank you for your institution's membership and your continued support.

Naomi Schrag
Columbia University
Chair, COGR Board of Directors

Matt Owens
President, COGR



COGR is the national authority on federal policies and regulations affecting U.S. research institutions.

232 Member Institutions - Universities, Affiliated Hospitals, and Independent Research Institutes



96% of eligible institutions among top 100 & 85% of eligible institutions among the top 200 institutions are COGR members (as measured in federal research expenditures)

Located in 49
States + D.C.

30+ Hispanic Serving
Institutions (HSI)
2 Historically Black
College and Universities
(HBCU)
1 Predominantly Black
Institutions (PBI)

19 Emerging
Research
Institution Pilot
Participants

\$54B+ in
annual federal
research
expenditures

88 Private &
144 Public
Research
Institutions

163 Carnegie
Research 1
Institutions

2700+ New
Issued Patents
13,000+ New
Patent
Applications
800+ New Start
Ups

Table of Contents

Introduction	5
2025 Administration Transition & Beyond	5
COGR Resources	7
Advocacy & Outreach	7
Amicus Briefs	8
Direct Threats to Indirect Cost Reimbursement	8
Science & Security	10
COGR's "Changes in Federal Research Requirements" Gets a Refresh	12
Emerging Issues	13
Additional Highlights from the Past Year	14
COGR Refreshes Mission Statement, Tagline, and Logo	15
Welcome New COGR Member Institutions	16
Farewell and Welcome: COGR Board of Directors Transitions	17
At-Large Committee Member Transitions	18
Emerging Research Institutions Pilot Program	19
Participating ERI Pilot Institutions	19
Get Engaged with COGR	20
COGR on LinkedIn	20
COGR Portal – Are You In?	20
COGR Volunteer Survey	20
COGR Meetings & Events	20
COGR Membership Renewal	21
Thank You for Hosting: Campus Visits in FY 25	21
COGR in the Media	22
Federal Register and Agency Comment Letters	22
Looking Ahead to FY 26 & Beyond	24
Additional Resources for Members & Pilot Institutions	24

Introduction

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As an association of 232 [research institutions](#) across the U.S., COGR champions policies with federal agencies that strengthen the research enterprise and reduce unnecessary regulatory burden. In addition, we provide our members with expert analysis, guidance, and resources on the financial and regulatory infrastructure that underpins federally funded research. In an era marked by heightened scrutiny, shifting federal priorities, and significant policy challenges, COGR has remained a trusted source of clarity and advocacy.

Each year, as the academic and fiscal year comes to a close, we reflect on what COGR has accomplished on behalf of our members. Our impact is made possible by the dedication of our member institutions, the leadership of our [Board of Directors](#), the expertise of our [Committee members](#), [COGR staff](#), and the many volunteers who contribute through working groups, panels, and collaborative efforts.

Your continued engagement and institutional support help ensure COGR can respond effectively to challenges and help shape the future of research policy.

Thank you for your institution's membership!

2025 Administration Transition & Beyond

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Since the start of its second term, the Trump Administration has issued a sweeping number of [executive orders](#) and policy directives that have significantly disrupted the research landscape. These actions have created widespread uncertainty and increased the administrative burden. Efforts to curtail federal support for DEIA and actions such as agency policies capping indirect cost rates at 15%, have generated deep concern regarding the inclusivity and sustainability of the U.S. research enterprise. Several COGR member institutions, along with a few higher education associations, are actively engaged [in litigation](#) in response to the actions of the Administration.

In response to this rapidly evolving environment, COGR has taken proactive steps to support our members and to advocate strongly on behalf of the research community. The [COGR 2025 Administration Transition Information & Resources](#) webpage was developed to help members track changes and access timely resources. As part of these efforts, COGR published the [Framework for Navigating the 2025](#)

[Administration Transition](#), providing institutions with resources amid shifting federal priorities and policies.

Since the second Trump Administration issued its first executive order on January 20, 2025, COGR staff have been monitoring presidential actions and identifying those with the most significant implications for research policy, science, regulatory compliance, and funding. The [Summary of Executive Orders](#) has been updated 15 times and currently identifies 27 high-impact orders affecting the academic research enterprise.

COGR has also co-led or joined with partner organizations in filing amicus briefs to lawsuits on the termination of research grants and federal agency policies to cap facilities and administrative costs at 15%. We have also maintained an active [Litigation Tracker](#) to monitor the pending legal challenges related to executive actions and other federal activities impacting research.

COGR joined with other national higher education and research associations to submit a joint letter to federal officials, expressing strong concern about the unnecessary disruptions to federally supported research. Also, we have shared with OSTP and OMB officials' [actionable ideas](#) that the Administration can take to reduce the red tape affecting federally funded research.

As a resource for the community and advocacy efforts, COGR developed a [Fact Sheet](#) on the Defend the Spend policy, highlighting the inefficiencies and excessive burden created by new federal payment justification requirements. The fact sheet features the redundant work of over 53,000 hours of work by IHEs and agencies, and it presents actionable solutions. COGR efforts such as this highlight the real-world impacts of the Administration's federal research policies.

As we strive to advance effective research policy amidst a flurry of harmful policy proposals and actions, we have significantly increased engagement with the [media](#) and provided background information, resources, and commentary on the aforementioned policy issues and others that impact COGR members.



Waste and Inefficiencies Due to the New Grant Requirements

The goal of Executive Order (EO) 14222 is to increase efficiency and transparency and cut costs. Yet, in practice, the new requirements have led to the exact opposite, thereby adding new strains on federally supported research and increasing costs.

What is the problem with Defend the Spend?

The implementation of [EO 14222](#) resulted in **additional costs and time without any value**:

100% Redundant

Federal agencies implemented a new requirement to collect justifications for project expenses that the agencies had already authorized (and which are subject to recipient certification and independent audit). This request is redundant and unnecessary, as the information is readily available to the agencies as outlined in Appendix.

Excessive Burden and Waste

Research grant recipients may submit dozens of pages to justify a single payment, and inconsistent agency requirements prevents a systematic solution. DOGE's "Defend the Spend" resulted in approximately **53,749 hours of redundant work**¹ for recipients and agencies. Over a 35-day period, **107,497 transactions** were reported, with agencies required to review the additional justifications ([DOGE payment statistics](#), last updated May 2025).

Figure 1. Fact Sheet: [Defend the Spend](#)

COGR Resources

- [Fact Sheet #1: Defend the Spend](#)
- [Framework for Navigating the 2025 Administration Transition](#)
- [COGR Forum Series: Adapting to Change, Policy Shifts, and Research Impact](#)
- [Executive Order Summary Tracker](#)
- [Litigation Tracker](#)
- [COGR Updates](#)
- [Institutional Transition Impact Surveys](#)

Advocacy & Outreach

- [COGR Advocates for Full Reinstatement of NIH Grants in Joint Association Letter to Director, Dr. Bhattacharya](#) (July 29, 2025)
- [COGR Submits Comments in Response to DHHS RFI: Ensuring Lawful Regulation and Unleashing Innovation to Make America Healthy Again](#) (July 24, 2025)
- [COGR Responds to OPM Proposed Rule on Schedule F Changes](#) (May 21, 2025)
- [COGR Submits Response to OMB RFI on Deregulation](#) (May 7, 2025)

- [Statement by COGR President Matt Owens on NIH's Announcement to Move Up Implementation of the NIH Public Access Policy](#) (April 30, 2025)
- [COGR Initiates Contact with Newly Appointed NIH Director Regarding the Partnership Between NIH and Research Institutions and Requests Clarifications on NIH Policies](#) (April 9, 2025)
- [Actionable Ideas to Improve Government Efficiency Affecting the Performance of Research](#) (April 9, 2025)
- [COGR Joins AAU and APLU Presidents in Submitting Joint Letter to Government Officials in Response to Unnecessary Disruptions to Federally Supported Research](#) (February 18, 2025)
- [Statement by COGR President Matt Owens on the HHS Policy on Adhering the Text of the Administrative Procedures Act](#) (February 8, 2025)
- [COGR Letters to Trump Administration on Reducing Red Tape Affecting Research:](#)
 - [Letter to President Donald J. Trump](#) (January 29, 2025)
 - [Letter to Trump Incoming Administration Officials](#) (January 29, 2025)

Amicus Briefs

- [COGR, NACUBO, and 16 Other Organizations File Amicus Brief Supporting Community Appeal of Indirect Cost Reimbursement Rate Cap](#) (June 16, 2025)
- [COGR Joins Amicus Brief on Harvard vs. DHHS](#) (June 9, 2025)
- [COGR Joins Second Amicus Brief on HHS/NIH Grant Terminations Suit](#) (April 28, 2025)
- [COGR Joins Amicus Brief on HHS/NIH Grant Terminations Suit](#) (April 18, 2025)

Direct Threats to Indirect Cost Reimbursement

COGR's advocacy for equitable federal reimbursement of facilities and administrative (F&A/indirect) costs accelerated dramatically during the year. Reports and other communications demonstrating the real cost of supporting research, the growth of institutional subsidies, and the problems with caps on cost reimbursement were produced or updated.

These materials and other relevant resources are available on a new COGR [F&A Cost Reimbursement Materials](#) webpage, and include an infographic dispelling the myth

that an institution's F&A cost reimbursement rate represents a percent of the total award (Figure 2) and an updated [Understanding the Real Costs of Research](#) video.

Facilities & Administrative (F&A/Indirect) Cost Rates Are NOT a Percent of the Total Award
They are a percent of a subset of Direct Costs (DC) called Modified Total Direct Costs (MTDC)

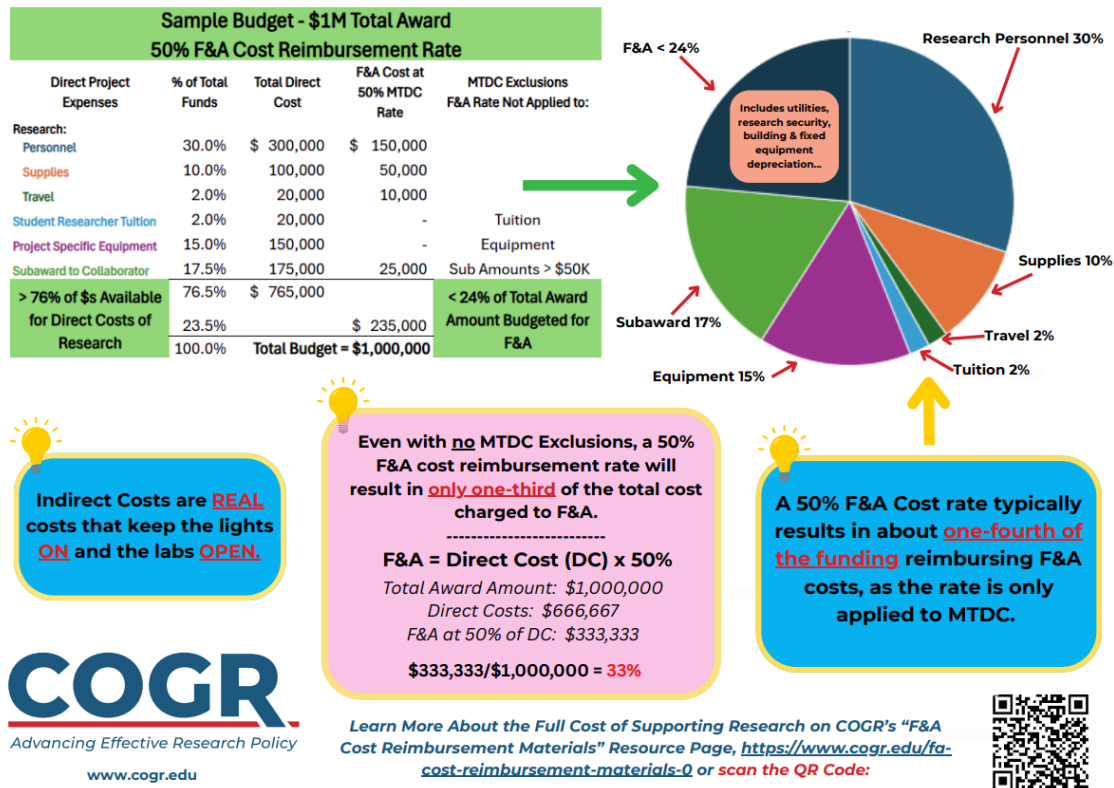


Figure 2. *F&A Cost Rates are NOT a Percent of the Total Award*

COGR also called on OMB to provide corrections and/or clarification to allow institutions to take practical measures to implement revisions to Uniform Guidance, effective October 1, 2024, impacting F&A cost reimbursement rates. Revisions include new Modified Total Direct Cost thresholds for subawards (\$50,000) and equipment (\$10,000). On September 20, 2024, COGR published its "Fifth Look" at Uniform Guidance changes, [Implementation and Readiness Guide for the OMB Guidance for Federal Financial Assistance](#), including an Appendix of "Facilities and Administrative Cost (Indirect Cost, or "IDC") Rate Considerations".

Since the [2025 Administration Transition](#), COGR has forcefully responded to agency attempts to limit reimbursement of indirect cost to 15%, including issuing [statements](#) and filing an amicus brief, [Supporting Community Appeal of Indirect Cost Reimbursement Rate Cap](#), along with NACUBO and 16 other organizations. COGR is also an active participant in the [Joint Associations Group on Indirect Cost](#), formed in April 2025 to develop and propose a new model for funding the indirect costs of

supporting research and proactively addressing attacks based on common misunderstandings of the current model. COGR is continuing to assess the proposed Financial Accountability in Research (FAIR) model and explore practical implementation approaches.

- [F&A Cost Reimbursement Materials](#)
- [NIH 15% Cap on Indirect Cost Reimbursement – Information & Resources](#)
- [Costs of Federal Research Infographic](#) (Updated December 2024)
- [F&A Cost Rates are NOT a Percent of the Total Award](#) (February 2025)
- [F&A Survey Capstone: Cost Reimbursement Rates, Actual Reimbursement, and Growing Regulatory Burden](#) (December 2024)
- [National Organizations Announce Joint Effort to Develop a New Indirect Costs Funding Model](#) (April 8, 2025)
 - [Joint Associations Group \(JAG\) Information and Resources](#) [Joint Associations Group \(JAG\) Information, and Resources](#), and the [FAIR Model](#)

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Science & Security

Research security remained a focus of federal research policy this year. Agencies continued implementation of National Security Presidential Memorandum 33 ([NSPM-33](#)), including the expanded use of common disclosure forms and provisions of the CHIPS and Science Act (CHIPS Act), such as prohibitions on malign foreign talent recruitment program (MFTRP) participation and mandatory research security training. Additionally, federal agencies took several consequential actions, including:

- NSF SECURE Center released a [consolidated version](#) of the existing research security training modules to assist institutions and covered individuals in meeting the CHIPS Act training requirements.
- DoD finalized the CMMC 2.0 framework for defense contractors and subcontractors who have access to or are creating controlled unclassified information (CUI) during the performance of a contract. USDA released a department-wide research security memorandum with disclosure and pre-approval requirements for foreign engagements.
- NSF, NIH, DOE, DoD, and NASA issued updated guidance and launched internal oversight mechanisms, training programs, and disclosure verification

protocols, reflecting a government-wide effort to continue to implement research security measures.

- DOJ issued its final rule on the transfer of bulk U.S. persons' sensitive data foreign countries/entities of concern which will impact research institutions' research and business operations.

Over the past year, COGR closely tracked these and other developments and implementation of research security policies and relevant White House executive orders. COGR staff actively participated in agency listening sessions, submitted formal comments and engaged in discussions with agency personnel on draft regulations/policies, proposed disclosure procedures, and related notices to ensure institutional perspectives were represented.

COGR also worked to strengthen relationships with key partners, including renewed engagement with the FBI and ongoing collaboration with federal agency officials. Staff and committee members contributed expertise through national forums and policy discussions, serving as speakers on research security-focused panels and offering institutional insights at events such as the National Academies' [*Assessing Research Security Efforts in Higher Education: Experts Meeting and Workshop Series*](#). These efforts helped inform policy development while supporting the research community's compliance and implementation efforts.

Additional detail on our efforts is included in the list that follows and on [COGR's Science and Security](#) webpage.

- [Quick Reference Table of Current & Upcoming Federal Research Security Requirements](#) (Updated May 2025)
- [COGR Matrix of Science & Security Laws, Regulations, and Policies](#) (Updated May 2025)
- [COGR Joins Community Letter to NIH Requesting a Meeting to Discuss the Future Implementation of U.S. Government Policy for Oversight of DURC and PEPP](#) (March 24, 2025)
- [COGR Partners with Multi-Association Response Regarding FAR Case 2017-016 "Federal Acquisition Regulations: Controlled Unclassified Information" \(Proposed Rule\)](#) (March 17, 2025)
- [COGR Submits Comments in Response to NSF NITRD NCO's "RFI – Development of an Artificial Intelligence Action Plan"](#) (March 14, 2025)
- [Overview of DoD Cybersecurity Maturity Model Certification 2.0 – Effective December 16, 2024](#) (January 15, 2025)

- [COGR Response to NSF RFI on CHIPS and Science Act, Section 10343](#) (December 6, 2024)
- [COGR Responds to USDOJ's Notice of Proposed Rulemaking - Provisions Pertaining to Preventing Access to U.S. Sensitive Personal Data and Government-Related Data by Countries of Concern or Covered Persons](#) (November 27, 2024)
- [COGR Submits Response to Interim Final Rule - "Implementation of Controls on Advanced Technologies Consistent with Controls Implemented by International Partners"](#) (November 5, 2024)
- [COGR Joins a Multi-Association Request to DOE's RTES for Full Engagement with the Research Community Prior to Implementation of Risk Matrices](#) (August 19, 2024)

COGR's "Changes in Federal Research Requirements" Gets a Refresh



In January 2025, COGR [released an update](#) to the "Changes in Federal Research Requirements" document, which lists requirements that have been implemented, amended, or are changes to interpretation to requirements affecting the conduct of federal research since 1991, when the 26% cap on administrative costs was imposed on facilities and administrative costs (F&A) reimbursements for institutions of higher education. Consequently, almost every university – small and large, now subsidizes the cost of each new federal research-related regulation.

The refreshed 2025 edition of the Changes in Federal Research Requirements includes:

- New requirements added since August 2024 when the previous addition was released;
- An updated cumulative requirements graphic that highlights that the number of new/changed policies and regulations in the past ten years represents 62% of the total implemented or changed since 1991;
- An updated trend line of gross domestic product (GDP) figures with the most up to date information; and
- Downloadable graphics.

Annual updates to this document will occur on an end-of-year schedule, so that totals are reflective of the full calendar year. All previous editions have been archived.

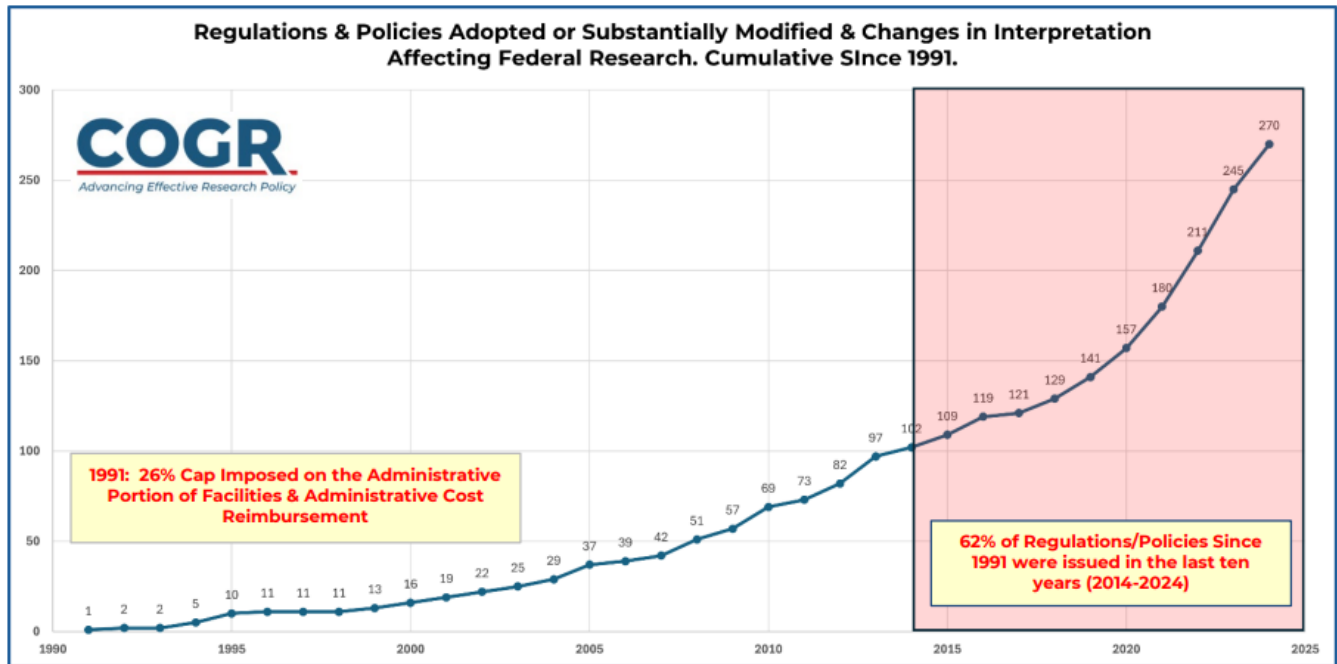


Figure 3. *Regulations & Policies Adopted or Substantially Modified & Changes in Interpretation Affecting Federal Research. Cumulative Since 1991.*

Emerging Issues

In addition to the administration transition issues noted above, COGR is closely following emerging issues stemming from new policies and approaches implemented by the current administration. Key emerging issues that COGR is tracking include:

- Changes in Federal Agencies' Policies regarding Animal Research and Encouraging Use of New Approach Methodologies (NAMS)
 - [FDA's Plan to Phase Out Animal Testing Requirement for Monoclonal Antibodies and Other Drugs](#), including implementation roadmap.
 - [NIH's Prioritization of Human-Based Research](#)
- Agencies' Implementation of [Executive Order on Restoring Gold Standard Science](#), Including Development of New Scientific Integrity Policies
 - [OSTP, Agency Guidance for Implementing Gold Standard Science in the Conduct & Management of Scientific Activities](#)

- Appropriate Use of AI in Research Proposals and Intersection with Research Misconduct
 - [NIH, Supporting Fairness and Originality in NIH Research Applications \(NOT-OD-25-132\)](#)
- Easier Registration Requirements for Researchers Conducting Research on Controlled Substances Under the [HALT Fentanyl Act](#)

COGR continues to monitor closely and engage these issues and others that are emerging in the year ahead. We will provide updates through COGR Updates, membership convenings, and other mechanisms as appropriate.

Additional Highlights from the Past Year

- COGR helped institutions navigate new DURC and Dangerous Gain-of-Function (DGOF) oversight under [Executive Order 14292](#). COGR continues to engage with NIH on unclear reporting requirements, gathered institutional feedback on “pause” notices, and [collaborated](#) with ABSA and ASM to analyze OSTP’s new DURC/PEPP policy. COGR also developed [comparison tables](#) outlining policy changes and shared implementation strategies with members.
- The Contracts & Grants Administration (CGA) and Research Security & Intellectual Property Committees hosted virtual open houses on May 21 and April 22, respectively. These open houses provided an opportunity for COGR members to ‘meet the committees’ and hear what issues the committees are currently engaging in.
- Released [Results from COGR/ARIO Survey of Research Integrity Officials on Final ORI Research Misconduct Rule](#) (February 7, 2025)
- Released an [Updated Summary of Recent Updates to the NIH Genomic Data Sharing Policy](#) (January 2025)
- Published the [COGR’s 2 CFR 200 “Look Series”](#)
 - [Fifth Look: Implementation & Readiness Guide for the OMB Guidance for Federal Financial Assistance](#) (September 20, 2024)
- Hosted webinar on [“Going AI: Cutting Edge Strategies for Enhancing Research Administration Efficiency Through Practical Application of Artificial Intelligence](#) (September 16, 2024)
- Presented the recommendations and the case for reducing federal regulatory burdens to the [National Academies Strategic Council for Research Excellence](#),

[Integrity, and Trust](#) and the [Improving the Regulatory Efficiency and Reducing Administrative Workload to Strengthen Competitiveness and Productivity of U.S. Research Committee](#) ([March 5, 2025](#) and [May 21, 2025](#))

COGR Refreshes Mission Statement, Tagline, and Logo

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In October 2024, COGR adopted a refreshed mission statement, tagline, and logo. After ten months of research and consultation, including a survey to the membership in May 2024, the Board of Directors approved a refreshed mission statement that is married with a declarative statement about the association:



Accompanying purpose and impact statements were also approved. Together, these statements provide a clearer description of who we are, what we do, and why it matters. These statements informed the changes to COGR's brand identity in our refreshed tagline and logo. [See the evolution here.](#)



The new tagline – “Advancing Effective Research Policy” – captures the essence of what COGR does and entices the audience to learn more. The refreshed logo provides a familiar continuity in appearance with a subtle signal of what COGR does. The bolder red line under the logo not only highlights our name better, it evokes the “red tape” that COGR helps cut through.

Together, these enhancements to COGR's mission and brand identity project the strength of the association's 77-year history and now 232 member institutions across the country.

Welcome New COGR Member Institutions

Now 232 members strong, COGR welcomed 15 new member institutions since August 2024. Collectively, COGR institutions boast over \$54 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.



Figure 4. New COGR Membership Institutions

Farewell and Welcome: COGR Board of Directors Transitions



Michael Legrand, UC Davis



Elizabeth Peloso, UPenn



Lori Schulz, CSU

COGR is pleased to welcome to our Board of Directors [Michael Legrand](#), Associate Controller and Finance Director, University of California, Davis, [Elizabeth Peloso](#), Associate Vice Provost/Associate Vice President for Research, University of Pennsylvania, and [Lori Schultz](#), Assistant Vice President, Research Administration, Colorado State University. Their terms started February 15, 2025. Mr. Legrand is continuing his service on the Costing and Financial Compliance (CFC) Committee and Ms. Schultz is serving on the Contracts and Grants Administration (CGA) Committee. Ms. Peloso previously served on the COGR Board and has resumed service on the Research Security & Intellectual Property (RSIP) Committee. We thank them for their increased commitment and service to the COGR community.

We also wish to recognize Sarah Axelrod, Assistant Vice President of Sponsored Programs, Harvard University (retired), whose board term ended on January 31, 2025, and Stephanie Endy, Associate Vice President for Research, Brown University (retired), whose board term ended on December 31, 2024. In addition, we recognize Theresa Colecchia, Of Counsel, Johns Hopkins University, whose board term concluded on July 31, 2025.

Ms. Axelrod served for many years on COGR's CFC Committee, including service as CFC's Chair. She was succeeded in her role as Chair by Jeremy Forsberg, Associate Vice President for Research at University of Texas at Arlington. Ms. Endy served for many years on COGR's CGA Committee, including service as CGA's Chair, and was succeeded in her role as Chair by Lisa Mosley, Executive Director of Sponsored Projects, Yale University.

Ms. Colecchia will continue service on COGR's Research Ethics & Compliance (REC) Committee. Thank you to Sarah, Theresa, and Stephanie for your service and many contributions to the COGR community over the years.

At-Large Committee Member Transitions



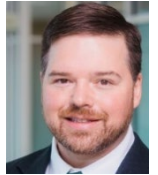
Maggie Ewell, GMU


Krystina Gross,
WUSTL

We are pleased to have welcomed the following individuals that began service this past fiscal year 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.

A warm welcome in FY 25 to:

- [Maggie Ewell](#), Director, Pre-Award Administration, George Mason University
- [Krystina Gross](#), Associate Vice Chancellor for Finance & Sponsored Projects, Washington University at St. Louis
- [Jonathan Miller](#), Associate Vice President for Research Regulatory Oversight, University of Alabama at Birmingham
- [Tracey Wilson-Holden](#), Assistant Vice President/Research Integrity Officer, Case Western University



Jonathan Miller, UAB


Tracey Wilson-
Holden, CWU

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:

- [Pamela Webb](#), Associate Vice President for Research, University of Minnesota (retired). Pamela served on COGR's Contracts and Grants Administration Committee for several years, including her time as Chair of the Committee. Pamela was also a member of COGR's Board of Directors (FY 14-FY20) and served as Chair of the Board in 2020.
- [Dan Nordquist](#), Deputy Vice President for Research Operations, Washington State University (retired). Dan began service on COGR's Research Security & Intellectual Property Committee in 2017.

Emerging Research Institutions Pilot Program

In August 2024, COGR launched its [Emerging Research Institutions](#) (ERI) Pilot program. This program provides an opportunity for institutions that do not yet meet COGR's membership threshold to formally engage with COGR and participate in association activities. The Pilot is a two-year program, and August 1, 2025, marked the beginning of Year 2. Over this past year, we are thrilled to have welcomed 15 institutions to the ERI Pilot and have already welcomed 4 additional institutions for Year 2. There are still openings in the Pilot for Year 2, though space is limited. If you have questions about eligibility or would like more information, please reach out to Toni Russo, Chief Operating Officer, at eriservices@cogr.edu.

Participating ERI Pilot Institutions



Figure 5. Participating ERI Pilot Institutions

Get Engaged with COGR



COGR on LinkedIn

In addition to providing another engagement platform for COGR members, we use 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 the association'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.

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 Volunteer Survey

Interested in becoming more involved with COGR? Complete the [COGR Volunteer Survey](#) and let us know your areas of interest/expertise, the capacity in which you would like to serve, and other relevant information. COGR uses this survey to help identify individuals to serve on COGR's [four standing committees](#), workgroups we convene from time to time on various topics, and more.

COGR Meetings & Events

COGR holds two in-person meetings in Washington D.C. and one virtual meeting each year, and [slides and recordings](#) are posted for attendees. COGR's upcoming membership meetings for FY 26 will be on the following dates:

- October 23-24, 2025 in Washington D.C.

- February 24-27, 2026 via Zoom (Virtual)
- June 11-12, 2026 in Washington D.C.

In addition, we offer complimentary webinars for the COGR membership on current issues throughout the year. For a list of upcoming events, visit [COGR's Meeting and Webinars](#) page.

New this year, COGR has adopted a [COGR Events Code of Conduct Policy](#). COGR is committed to providing a safe, productive, respectful, welcoming and inclusive environment for all participants of COGR events. By registering for COGR events (both in-person and virtual), attendees agree to abide by this policy. If you have any questions, please contact memberservices@cogr.edu.

COGR Membership Renewal

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COGR membership annual dues and ERI Pilot Participation Fee invoices for FY 26 are now available for download. The fiscal year runs August 1, 2025-July 31, 2026, and invoices are due August 1, 2025. To download the invoice, the Primary Representative or billing contacts for the institution can log into the COGR Portal, and a gray renewal badge will appear. Follow the prompts to update your contact information, and then you can download the invoice. COGR membership invoices can be paid via check or ACH/EFT, and ERI Pilot invoices can be paid via credit card, check, or ACH/EFT. Please ensure payment are sent to the correct address. A copy of COGR's W-9 is available [here](#). If you have any questions or need assistance, please contact memberservices@cogr.edu.

Thank You for Hosting: Campus Visits in FY 25

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Over the past year, President Matt Owens had the honor of visiting 13 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 institutional leaders, research administrators, and faculty 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.

- Rutgers University
- University of North Carolina Chapel Hill
- Duke University
- University of Michigan
- San Diego State University
- University of California San Diego
- University of California Riverside
- Lehigh University
- University of Connecticut
- University of California Davis
- University of California President's Office
- Colorado State University
- University of Denver

COGR in the Media



COGR has fielded an unprecedented number of requests from the media since January 2025 to provide quotes, commentary, and background on a variety of issues the association is closely engaged in. COGR staff have been quoted in Science Magazine, Inside Higher Education, the Washington Post, CBS News, Politico, and many more. A list of quotes & mentions, as well as information for the media, can be found on COGR's new Media Resources [page here](#).

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, in addition to those noted above, COGR has submitted 14 such comment letters, some of which were in partnership with other higher education and research associations.

- [COGR Submits Letter to EPA on NPRM Regarding Methylene Chloride; Regulation Under the Toxic Substances Control Act; Compliance Date Extensions](#) (June 23, 2025)
- [COGR Submits Comments in Response to DOE Interim Final Rule \(IFR\), "Update and Relocation of the Department of Energy Technology Investment Agreement Regulations"](#) (March 4, 2025)
- [COGR Partners in Multi-Association Comment Letter on NIH Plan to Increase Findability and Transparency of Research Results Through the Use of Metadata and Persistent Identifiers \(PID\) - NOT-OD-25-050](#) (February 21, 2025)
- [COGR Responds to NSF RFC on Proposed Intellectual Property Options](#) (February 21, 2025)
- [COGR Submits Response to NSF's Comment Request: NSF PAPPG \(NSF 26-1\)](#) (February 10, 2025)
- [COGR Joins in Community Letter to USDA on Research Access to Germplasm](#) (February 7, 2025)
- [COGR Submits Comments to the Department of Commerce on Ethical Guidelines for Research Using Pervasive Data](#) (January 13, 2025)
- [COGR, APLU, and AAU Submit Joint Comments Regarding Public Access to DoD-Funded Fundamental Research](#) (November 25, 2024)
- [COGR Submits Response to Health and Human Services Adoption of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#) (November 1, 2024)
- COGR Endorsements:
 - [AUECO Comment Letter to BIS on Export Administration Regulations: Crime Controls and Expansion/Update of U.S. Persons Controls](#) (September 25, 2024)
 - [AUECO Letter to U.S. Department of State on International Traffic in Arms Regulations: Revisions to Definition and Controls Related to Defense Services](#) (September 25, 2024)
 - [AUECO Comments to BIS on End-Use and End-User Based Export Controls, Including U.S. Persons Activities Controls: Military and Intelligence End Use and End Users](#) (September 25, 2024)
- [COGR, AAU, and APLU Letter to DOE on Financial Assistance Regulations-Conflict of Interest and Conflict of Commitment Policy Requirements](#) (August 16, 2024)
- [COGR Joins a Multi-Association Response to NIH's Draft Public Access Policy](#) (August 16, 2024)

Looking Ahead to FY 26 & Beyond

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Future Membership Meeting Location: As previously announced, COGR will be moving our in-person membership meetings to the [Crystal Gateway Marriott](#) in Arlington, Virginia beginning June 2027. Right over the bridge from Washington D.C., this newly renovated hotel provides larger meeting rooms, is conveniently located one metro stop from DCA airport, and offers a lower hotel nightly rate for COGR meeting attendees. Until June 2027, COGR will continue to host its membership meetings at the [Washington Marriott in Georgetown](#).

New COGR Website: COGR has been working on a new website with updated functionality and organization to meet the needs of the members. The new website will feature a fresh look, an enhanced search function, and more robust policy and event pages to better serve our membership and communicate COGR's impact more broadly. We look forward to announcing its launch later this calendar year.

Additional Resources for Members & ERI Pilot Institutions

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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. Several times per year, COGR provides its membership with [updates of current issues and hot topics](#), with the most recent being our [July 2025 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.

If you are an ERI Pilot Institution Representative, please contact ERIservices@cogr.edu.



COGR.

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