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**COGR Letter on NIH RFI Input on Reduction of Cost and Burden Associated with OMB  
Circular A-21**

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# COGR

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July 28, 2011

Attention: A-21 Task Force  
National Science and Technology Council (NSTC)  
Interagency Working Group on Research Business Models (RBM)  
Subcommittee on Social, Behavioral and Economic  
Sciences (SBE) of the Committee on Science (CoS)

Subject: RFI: Input on Reduction of Cost and Burden Associated with  
Federal Cost Principles for Educational Institutions  
(OMB Circular A-21)

Email to: [http://grants.nih.gov/grants/guide/rfi\\_files/a-21/add.htm](http://grants.nih.gov/grants/guide/rfi_files/a-21/add.htm)

To the Members of the A-21 Task Force:

The Council on Governmental Relations (COGR) is an association of over 180 Research Universities and affiliated academic medical centers and research institutes. Our member institutions conduct over \$55 billion in research and development activities each year and play a major role in performing basic research on behalf of the Federal government. The Research Universities and affiliated institutions represented by COGR receive support from more than 25 federal agencies. We bring a unique perspective to regulatory and cost burden and focus our concern on the influence of federal regulations, policies and practices on the performance of research and other sponsored activities carried out at COGR institutions.

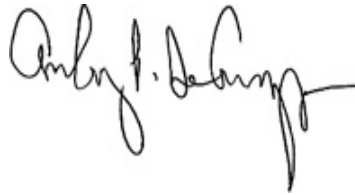
On the following pages we have presented an Executive Summary of the COGR Recommendations. After the Executive Summary, each Recommendation is expanded to provide Proposed Actions and the Rationale for each Recommendation. In a number of cases, we have included proposed changes to the text in OMB Circular A-21.

Our Recommendations apply to Research Universities that are subject to OMB Circular A-21, *Cost Principles for Educational Institutions*. For many of the Recommendations, they also are appropriate for institutions covered under OMB Circular A-122, *Cost Principles for Non-Profit Organizations*, and Appendix E/45 CFR Part 74, *Principles for Determining Costs Applicable to Research and Development under Grants and Contracts with Hospitals*.

A-21 Task Force  
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On behalf of the entire COGR membership and COGR Board, we appreciate the efforts being made by the A-21 Task Force. Many of the Recommendations that follow can be implemented immediately, and we look forward to working with you to put each of the Recommendations into practice.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony P. DeCrappeo". The signature is fluid and cursive, with a long horizontal stroke at the end.

Anthony P. DeCrappeo  
President, COGR

Attachment  
Executive Summary  
Pages 1 – 45