

February 18, 2025

The Honorable Michael Kratsios
Assistant to the President for Science &
Technology
Office of Science and Technology Policy
1650 Pennsylvania Avenue NW
Washington, DC 20502

The Honorable Russell T. Vought
Director
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

RE: Unnecessary Disruptions to Federally Supported Research

Dear Assistant to the President Kratsios and Director Vought:

We write to raise significant concerns about the unprecedented and unnecessary disruption and confusion caused by many of the agency actions taken in response to recently issued Executive Orders. Agencies' failure to follow the notice and procedural requirements of their awards and governing regulations will result in long-term negative impacts on America's research enterprise. We urge you to consider our recommendations below that aim to promote good stewardship of the funds Congress appropriated to research activities that are vital to our nation's security, health, and economic competitiveness.

Recent executive actions and communications have caused significant confusion and disruption to research that is vital to our national interests. Actions with significant negative repercussions include:

- disruptions in cash flow caused by cancellation of payments and closing payment request systems, which cause particular harm to individuals receiving stipends directly from the federal government, including some postdoctoral fellows;
- requirements for grantee certification of compliance with the Executive Order on [Ending Radical and Wasteful Government DEI Programs and Preferencing](#), which provided no definition or concrete guidance as to which diversity, equity, and inclusion (DEI) activities are prohibited under applicable laws;
- abrupt unilateral directives, including stop work orders and terminations of projects with the State Department and USAID due to no fault of the grantees/contractors, as well as projects related to gender-related research at the NIH and other stop work orders at NASA, DOE, the Department of Interior, and other agencies; and
- NIH's elimination of one-time authority for No-Cost Extensions.

We urge you to take the following additional actions, consistent with the rescission of M-25-13 and the temporary restraining orders entered in cases filed in District Courts in Washington, D.C., Rhode Island, and Massachusetts:

- reopen the lines of communication that are vital between the research community and agency officials;
- provide assurance that there will be no further pause on payments for research activities under existing awards that are not specifically permitted under grant terms and conditions and applicable regulations;
- issue clear guidance about new submissions;
- refrain from penalizing research proposals already submitted under the specifications stated in research solicitations issued prior to recent changes in priorities;
- issue clear and transparent communications on programs allegedly implicated by Executive Orders;
- honor your agency's contractual obligations and the terms and conditions of awards until otherwise modified in accordance with applicable law; and
- communicate with award recipients through direct award specific notifications and amendments.

Additionally, we are especially troubled by the recently imposed NIH policy to cap facilities and administrative (F&A) costs reimbursement at 15 percent. This policy would cripple health research and slow the pace of life-enhancing and life-saving treatments and cures. F&A costs reimbursement support the research infrastructure – buildings, utilities, cybersecurity, safety, and compliance with federal regulations – that are essential to the ability of research institutions to perform cutting-edge research. We strongly urge that other federal agencies refrain from imposing such harmful policies. Our members will continue to honor the terms and conditions of federal grants and contracts, and we urge that the federal government reciprocate.

We want to work with you to ensure that policy changes affecting the conduct of federally supported research will strengthen research vital to our nation's security, health, and economic competitiveness.

Sincerely,



Barbara Snyder
President, AAU



Mark P. Becker, Ph.D.
President, APLU



Matt Owens
President, COGR

Cc: The Honorable Doug Burgum, Secretary of Interior
 The Honorable Sean Duffy, Secretary of Transportation
 The Honorable Peter Hegseth, Secretary of Defense
 The Honorable Robert F. Kennedy Jr., Secretary of Health and Human Services
 The Honorable Brooke Rollins, Secretary of Agriculture
 The Honorable Marco Rubio, Secretary of State
 The Honorable Chris Wright, Secretary of Energy
 The Honorable Lee Zeldin Administrator of the Environmental Protection Agency
 The Honorable Sethuraman Panchanathan Director of the National Science Foundation
 Ms. Denise Carter, Acting Secretary of the Department of Education
 Mr. Jeremy Pelter, Acting Secretary of the Department of Commerce
 Ms. Janet Petro, Acting Administrator of NASA

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APLU is a membership organization that fosters a community of university leaders collectively working to advance the mission of public research universities. The association's U.S membership consists of more than 230 public research universities, land-grant institutions, state university systems, and affiliated organizations spanning across all 50 states, the District of Columbia, and six U.S. territories. The association and its members collectively focus on increasing access, completion, and workforce readiness; promoting pathbreaking scientific research; and bolstering economic and community engagement. Annually, its U.S. member campuses enroll 4.3 million undergraduates and 1.3 million graduate students, award 1.3 million degrees, employ 1.2 million faculty and staff, and conduct \$58 billion in university-based research.

COGR is the national authority on federal policies and regulations affecting U.S. research institutions. We provide a unified voice for over 220 research universities and affiliated academic medical centers and research institutes. Our work strengthens the research partnership between the federal government and research institutions and furthers the frontiers of science, technology, and knowledge. We advocate for effective and efficient research policies and regulations that maximize and safeguard research investments and minimize administrative and cost burdens.