COGR
Advancing Effective Research Policy

Actionable Ideas to Improve Government Efficiency Affecting the Performance of Research

April 2025

This document outlines concrete actions the federal government can take to improve government efficiency and the regulations affecting the performance of federally supported fundamental research. This document is a companion to recommendations COGR made to the Trump Administration in January 2025.

	TOPIC	REGULATION & SOURCE AUTHORITY	INITIAL GOAL(S)	ISSUE/WHY IT'S NOT WORKING	IMPROVING EFFICIENCY
1	**Biosketch and Current and Pending Support Reporting Requirements**	Agency-prescribed reporting of information for grants, as prescribed in: Guidance for Implementing National Security Presidential Memorandum 33 (NSPM-33) on National Security Strategy for United States Government-Supported Research and Development" NSTC Common Forms NDAA 2021 Section 223 CHIPS and Science Act	Develop a single format, across all agencies, for researchers to provide their professional credentials and other research funding. Develop a consistent definition for "gifts" that do not require reporting that conforms with the definition of gift used by the Internal Revenue Services.	Not all agencies have implemented the forms. Those that have implemented the form require non-standard data elements. Lack of harmonization across agencies creates inefficiency, impeding full automation and complicates training efforts. The federal system, ideal for automating these forms (i.e., SciENcv), has only been implemented by NSF. Other agencies have not adopted SciENcv, resulting in inefficiencies in automating compliance. Gifts do not require reporting as Current and Pending/Other Support, but agencies use a definition of "gift" that is much broader than that used by the IRS, which institutions must follow for tax purposes. Using two different definitions impedes institutions' ability to develop efficient gift reporting and accounting processes and unnecessarily complicates personnel training. Further, given that foreign gifts are already reported via other mechanisms, the reporting of gifts as "other support" is duplicative and does not add further support for research security endeavors.	Implement the final NSTC forms across agencies without variation. Develop and share a single database regarding PI profiles (i.e., SciENcv) and sponsored activities, and require all agencies to use it. Require agencies to feed SciENcv with current and pending support from all federal granting agencies to eliminate the need for recipients to engage in extensive duplicate data entry. Implement APIs for SciENcv to facilitate institution data feeds. Adopt the IRS definition and examples of "gifts" in the context of evaluating funding as a "gift" or "current and pending/other support."

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2	**Research Project Proposal Development**	NSF PAPPG Proposal Preparation NIH Grant Proposal Guide – How to Apply NASA Grant and Cooperative Agreement Manual Other federal agencies like USDA, DOE and DOD have unique program-specific guides.	Provide federal agencies with the information they need to review, evaluate, and select research projects for funding[i].	Every funding agency has its own set of requirements for proposal submission[ii].	Develop a single application and process across all funding agencies. Reduce workload for applicants and agencies by implementing a 2-step process: 1) Reduce the length of the initial research plan proposal to 5 pages or less and link to SciENcv for the PI's professional credentials. 2) If the project is selected for funding, PI would submit additional forms and details if needed. Use fixed amount awards with modular budgets for fundamental research awards of up to $500K/year. See fixed amount awards information below. No additional training will be required unless a project is awarded.

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3	**Research Proposal Submission**	Federal agencies require proposal submission through one of the following portals: • Grants.gov • eRA/ASSIST (NIH) • Research.gov (NSF) • NSPIRES (NASA) • FedConnect (DOE) • STRIPES (DOE) • eBRAP (DOD CDMRP) This requirement stems from their grant and contracting authority and not a specific regulation.	Grants.gov was meant to be the single portal to automate all federal grant submissions.	There are multiple grant submission portals across the government. Each portal requires administrators and researchers to meet varying federal requirements, learn new systems, and keep current with agency-specific system requirements.	Choose one grant portal for all federal grant applications. All federal portals should utilize Login.gov and permit multiple institutional administrative contacts.
4	**Fixed Amount Awards for Fundamental Research Grants**	Definition of fixed amount awards in 2 CFR 200.1 Use of these awards, per 2 CFR 200.201(b)(4) Support Implementation of the President's management Agenda and Other Administrative Priorities – 2020	2 CFR 201 was meant to streamline fixed amount award requirements. The 2020 version of the Uniform Guidance emphasized performance-based awards that could be issued by federal granting agencies in low-risk situations to reduce burden and focus on performance accountability.	The 2024 revision of the Uniform Guidance requires additional certification of costs at the end of the grant period (2 CFR 200(b)(4)) for fixed amount awards, which is inconsistent with the definition of fixed amount awards and adds unnecessary burden on performance-based awards, as raised in 2020. Federal sponsors have not adequately utilized fixed amount awards for low-risk recipients.	Remove the new requirement (under 2 CFR 200.201 (b) (4)) to certify that all expenditures were incurred in accordance with the allowability of cost factors as CFR 200.201 (b) (1) prescribes that when the award amount is negotiated using the cost principles (or other pricing information) no "expected routine monitoring of the actual costs incurred by the recipient" is required. Require federal funding agencies to use fixed amount awards whenever possible, e.g., for all basic research awards of up to $500K/year.

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5	**Research Security Requirements for Fundamental Research**	NSPM-33 Implementation Guidance CHIPS and Science Act	Requires: Recipients to disclose potential conflicts of interest and conflicts of commitment. Recipients to train researchers on research security matters. Agencies to identify risk areas and develop guidelines to manage research security risks related to fundamental research. NIST to develop new cybersecurity requirements for *all* fundamental research, regardless of whether sensitive information is involved.	Regulations call for agencies to take a risk-based approach to research security, based on the technology being investigated and other factors. Instead, agencies are applying new requirements to *all* research, including low risk activities. Agencies are implementing unique training timelines (e.g., before proposal submission, at the time of award, every three years, only once), and different risk assessment rubrics (DOD, Army, DARPA, NIH, DOE, NSF) that hamper the development of compliant processes and training. Agencies also require unique reporting of travel that includes reporting of personal travel (e.g., vacation) and other travel unrelated to the award. These measures increase cost and burden without corresponding public benefit or safeguards to research.	Harmonize risk assessment requirements into a single risk matrix/rubric. Limit research travel reporting to trips paid for by federal funds. Revise training to be required only if a project is selected for an award with follow-up training once every 4 years thereafter if the researcher is receiving federal research funds.

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6	**Financial Conflicts of Interest**	HHS 42 CFR Part 50 Subpart F NSF Conflict of Interest policy DOE Conflict of Interest for Financial Assistance NASA Conflict of Interest Disclosures for Grant and Cooperative Agreement Recipients	Promote objectivity in research and prevent researcher conflicts that could result in financial gain for the researcher.	Each federal agency has developed their own conflict of interest policy and procedure, disclosure thresholds, reporting requirements, etc. which applies to research. Recipient institutions must create manual systems or use the most stringent requirements for disclosure, adding additional work for researchers and reviewers. Further, the $10K disclosure threshold set by NSF (and NIH) in 1995 has never been adjusted for inflation. There is no evidence to support that the lower thresholds yield more bias in research.	Implement one COI policy to govern all federally funded research based on the NSF Policy. Alternatively, if PHS policy is utilized as the model eliminates requirement for disclosure of sponsored/reimbursed travel. Consolidate existing reporting to one federal agency that collects the information needed. Limit COI training to one time before award acceptance. Establish consistent FCOI agency reporting requirements across all funding agencies modeled on the NSF policy that requires agency reporting only of unmanageable FCOIs, with institutions retaining responsibility for oversight of all manageable FCOIs.

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7	**Cybersecurity – Fundamental Research**	Cybersecurity Maturity Model Certification for DoD Guidance for Implementing National Security Presidential Memorandum 33 (NSPM-33) on National Security Strategy for United States Government-Supported Research and Development" Federal Register: Federal Acquisition Regulation: Controlled Unclassified Information	Enable agencies to appropriately identify and safeguard FCI and CUI in a project. Train researchers and IT professionals on the handling and storage of CUI. Preserve the principles of fundamental research in the application of cybersecurity requirements to ensure that federally funded research remains available to the broader scientific community and society. Incorporate cybersecurity requirements into the research security framework.	Agencies are implementing new cybersecurity requirements for *all* fundamental research, regardless of whether sensitive information is involved in addition to adding requirements for the handling and storage of CUI. CUI definitions are not uniform across federal agencies (32 CFR 2002 (h) and 32 CFR 170.4 (b)and a new proposed rule "Federal Acquisition Regulation: Controlled Unclassified Information." Requirements for managing CUI are not uniform across agencies, per FAR 52.204-21 "Covered Contractor Information Systems" Training requirements vary across agencies.	Expand the definition of "fundamental research" beyond the scope of NSDD-189. Fundamental research should be inclusive of all basic and applied research performed at U.S. Institutions of Higher Education that is ordinarily published and openly available to the scientific community without restriction for proprietary or national security reasons. Permit researchers and institutions to set appropriate standards for all non-CUI or non-FCI research information. Harmonize the definition of CUI training across agencies by requiring training modules offered by NARA. Provide clear guidelines for FCI and CUI including a singular definition of CUI to be used by all authoritative sources (NARA registry). Implement current requirements for management of CUI instead of new regulations per NIST. Implement a universal training requirement for all agencies to decrease cost and burden on contractors without increasing risk. See joint association response to the Federal Register : Federal Acquisition Regulation: Controlled Unclassified Information

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8	**iEdison Reporting**	Agency prescribed reporting of patents and inventions as prescribed in • DOE F205.11 • DOD DD Form 882 • NASA New Technology Reports (NTRs) • Form HHS 568	Recipients must report patentable inventions developed using federal funding, and the subsequent commercialization thereof, as required under the Bayh-Dole Act of 1980.	iEdison is intended to be the portal for all patent and utilization reporting, but not all agencies use the portal. Rather, agencies use different mechanisms for submission of invention reports. Agencies implement different, redundant reporting requirements throughout the life of the award due to award close-out requirements on multiple systems.	Mandate the use of iEdison by all federal funding agencies. Eliminate the dual reporting of inventions as part of the closeout process, e.g., closeout documents pertaining solely to inventions.
9	**FFATA Reporting**	Part 170-Reporting Subaward and Executive Compensation Information	Transparency of lower tier (subaward) funding to organizations	Hundreds of recipient organizations must report new subawards monthly in SAM.gov. The information being reported is already known by the funding awarding agencies.	Require federal grant agencies and GSA to coordinate and populate subaward data in SAM.gov as needed.
10	**Subrecipient Monitoring**	2 CFR 200.331-332	Prescribes steps the prime awardee must take when issuing subawards to a collaborating institution.	Prime awardee responsibilities have increased substantially in recent years. The vast majority of subawards are issued to institutions who receive prime awards from federal funding agencies – meaning the federal agencies have determined that these institutions are qualified to manage federal awards. Therefore, the exponential monitoring by hundreds of organizations is duplicative, expensive and offers no additional benefit to the government.	Eliminate the requirement to perform duplicative risk assessments for recipients for whom the government is making prime awards. Limit the risk assessment to confirming that the performing subrecipient has an audit report in the federal clearinghouse (census.gov) showing no findings specifically relevant to the funding passed through to the subrecipient. Eliminate the new requirement in the Uniform Guidance that mandates recipients to inform agencies when additional conditions are included in subawards §200.332 Requirements for pass-through entities.

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11	**DURC/PEPP Policy**	OSTP Policy on the Oversight of Dual Use Research of Concern and Pathogens with Enhanced Pandemic Potential	Ensure clarity and consistency regarding agents/toxins/and experiments subject to regulation.	Current policy abandons prior list-based approach and instead requires institutions and PIs to assess risk resulting in inconsistent approaches. New OSTP calls for each agency to implement. These types of policies have historically led to each agency developing unique policies and requirements.	Eliminate new policy and retain current 2012 DURC federal policy and 2014 DURC institutional policy and P3CO Policies. Address new risks by adding additional agents/toxins/experiments to current lists.
12	**Final Financial Report (FFR)**	NIH Grants Policy – Federal Financial Report HHS Grants Policy Statement (p.54): *(applicable to HRSA, SAMHSA and all HHS agencies other than NIH)* NASA Grant and Cooperative Agreement Manual (GCAM) (p.125) Other federal agencies have agency-specific guides. Other federal agencies have unique agency-specific guides.	When developed, most federal payment systems did not support award-by-award reporting and, therefore, the final financial report was the one method to verify the total expenditure amount for each federal award.	New billing systems enable reporting of expenditures by award, making this requirement outdated. Some federal agencies have eliminated the FFR, however, others still require it (NIH).	All federal payment systems should support bulk upload or an interface for efficient data entry. An FFR should not be required but, at a minimum, a federal sponsor requiring an FFR should provide for bulk uploading of data or other forms of combined reporting. Eliminate duplicative financial reporting required by some federal sponsors. All should use a process like NSF's in which NSF extracts final financial data from entries in its payment management system.

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13	**Data Management and Sharing**	NIH Data Management and Sharing Policy (2020) NSF Data Management and Sharing *(PAPPG 26-1 Draft, expanded)* Department of Energy Requirements and Guidance on Digital Research Management Data Other federal agencies have unique agency-specific guides.	Improve data maintenance and monitoring practices. Improve data integrity. Facilitate broad sharing of research results.	Data is already included in published material. Lack of central data repositories in some areas, making the data hard to find. Federal funding agencies have developed different, and sometimes multiple procedures in the same agency for sharing research data. Institutions may be required to maintain data after the end of the award, where there are no funds to support the work.	Coordinate and simplify standards across research disciplines, not agency standards. Provide support to organizations that maintain data repositories to make the data easier for researchers and the public to locate.
14	**Animal Welfare Act (9 CFR Part 2) and PHS Policy for Humane Care and Use of Laboratory Animals**	Animal Welfare Act PHS Policy for Humane Care and Use of Laboratory Animals	Ensuring the health, safety and welfare of animals used in federally funded research.	PHS and USDA have overlapping, duplicative, and sometimes inconsistent regulations.	Establish USDA as the sole agency for prescribing regulations for research using species of animals covered by the Animal Welfare Act. Establish PHS (Office of Laboratory Animal Welfare) as the sole agency for prescribing regulations for research using species of animals not covered by the Animal Welfare Act. Review the PHS Policy for the Humane Care and Use of Laboratory Animals to determine if it comports with its statutory authority at 42 U.S.C. Sec. 289(d), particularly with respect to its requirement

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					that institutions use the Guide for the Care and Use of Laboratory Animals as the basis for developing and implementing an institutional program for activities involving animals. Permit institutions that have AAALAC accreditation to rely on this accreditation as establishing their compliance with government regulatory standards and for ongoing program oversight.
15	**ClinicalTrials.gov**	PHS ClinicalTrials.gov NIH's Definition of a Clinical Trial FDA's Definition of a Clinical Trial	Ensure the listing of clinical trials and their results in the ClinicalTrials.gov site.	NIH and FDA use different definitions of clinical trials resulting in inconsistent application of this rule and additional burden in developing compliance systems and training.	NIH should harmonize its definition of clinical trial with the FDA definition of clinical investigation to decrease the resulting burden in reporting to clinicaltrials.gov.
16	**EPA Regulations That Impact Academic Research Facilities**	Revision to Toxic Substances Control Act (TSCA) - Revision to Risk Determination for Methylene Chloride	To facilitate health and safety of members of the public exposed to this chemical.	Methylene Chloride (also known as dichloromethane or DCM) is one of the most commonly used solvents in laboratories. The EPA put TSCA revision in place to comply with Executive Order 13990 (Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis), which the Trump Administration as revoked. Additionally, methylene chloride is currently regulated under OSHA	Remove the EPA revision and let the current regulation by OSHA stand as is.

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				Regulations at 29 CFR 1919.112, and duplicative regulation by EPA is unnecessary, particularly in university laboratory settings, which are designed to protect workers and where personal protective equipment standards are enforced.	
17	**Federal Invention Reporting Requirements**	Agency-prescribed reporting of patents as prescribed in 35 USC 202(c)(6).	Reporting of patentable inventions developed using federal funding, and commercialization thereof, as required under the 35 CFR Part 401.	There is a lack of uniformity among agencies in the form of the Government Support Clause, in their time to respond to waiver request and extensions of time for election of title, and information required to complete invention utilization reporting. These differences among agencies increase the cost and burden of compliance and jeopardize the potential commercialization of federally funded technologies.	Require standardized format for Government Support Clause in patents prescribed in 35 USC 202(c)(6). Require mandatory response time for waiver requests and extension of time for election of title with approval as being the default if no answer is received. Require agencies to use the IAWGBD patent utilization questions only without agency specific supplements.
18	**Human Subject Research Protections Under the Common Rule and FDA Regulations**	Common Rule at 45 CFR Part 46 FDA Regulations at 21 CFR Parts 50 and 56	Protecting the health, safety, and welfare of human subjects who participate in research projects, including clinical investigations.	Both the Common Rule and FDA regulations apply to clinical investigations that receive federal funding and that involve FDA regulated test articles, resulting in duplicative oversight.	Establish FDA as the sole federal agency regulating human subject research concerns for clinical investigations subject to FDA jurisdiction.

[i] *Researchers prepare more than 50K grant applications annually to NIH (https://report.nih.gov/nihdatabook/category/4 and about 40K applications to NSF https://nsf-gov-resources.nsf.gov/files/FY-2023-MeritReviewDigest.pdf?VersionId=3sAgeSb0hEErbqkmbPj3gBu5I7QSzCSO.*

[ii] *Proposals in response to these instructions can run 40-50 pages or more, yet the success rate for federal agencies runs only 20-30%, creating significant additional work for a low likelihood of funding. See https://report.nih.gov/nihdatabook/category/4 and https://nsf-gov-resources.nsf.gov/files/FY-2023-MeritReviewDigest.pdf?VersionId=3sAgeSb0hEErbqkmbPj3gBu5I7QSzCSO*