



January 29, 2025

Mr. Matthew Vaeth
Acting Director
Office of Management and Budget
725 17th Street, NW
Washington DC 20503

Mr. Michael Kratsios
Assistant to the President for Science and Technology
Office of Science and Technology Policy
1650 Pennsylvania Avenue NW
Washington DC 20502

Dear Mr. Vaeth and Mr. Kratsios:

I write in follow up to [my letter to President Trump](#) to offer COGR's assistance and provide specific recommendations to address red tape encumbering federally funded research. Reducing red tape would help to maximize taxpayers' research investments. It would also accelerate and bolster American science, technology, and innovation which underpin our nation's security, health, and economic competitiveness.

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 ("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. To this end, we also work to support effective and efficient compliance by our member institutions.

Reducing federal research regulations and requirements is essential to reinvigorating the long-standing Partnership. Academic research institutions play a unique role in our nation's research and innovation ecosystem, and they contribute significantly to our nation's economic strength. They not only conduct research in a cost-efficient manner, but they also train the next generation of scientists, engineers, technically skilled workers, entrepreneurs, and leaders. Moreover, academic research institutions invest in cutting-edge research facilities and compete for and perform nearly 50 percent of federally sponsored basic research, as well as almost 40 percent of applied research¹. Basic research is not the primary focus of industry because of the long horizon for a return on investment. U.S. industry relies on these research institutions for early-stage research to develop the foundation for their research more specific to product development.

We believe there are actionable measures the Trump administration can take to address red tape impeding research. We offer the following recommendations and are prepared to work with you on these and other ideas you may be considering.

1. Create a Central Mechanism to Streamline and Harmonize Research Regulations

No one federal research agency can address the [growing](#) and incongruous body of research

¹ Source: Survey of Federal Funds for Research and Development (2022-2023), <https://nces.nsf.gov/surveys/federal-funds-research-development/2022-2023#data>

regulations and requirements. As such, we recommend that your administration establish a Research Policy Board within the Office of Management and Budget (OMB), as recommended in a [2016 National Academies report](#) and authorized by the 21st Century Cures Act. This board would serve as a primary policy forum for discussing ways to streamline and harmonize research regulations and act as a central mechanism to this end.

Related, we recommend establishing the position of associate director for the academic research enterprise in the Office of Science and Technology Policy (OSTP), as recommended in the same National Academies report. This senior position would be a principal federal contact for the proposed Research Policy Board, oversee and facilitate the general health of the Partnership, and work closely with OMB's Office of Information and Regulatory Affairs (OIRA) to manage overall regulatory burden. As originally envisioned, this position would also work with the OIRA Administrator to issue an annual report on regulatory issues and actions affecting the Partnership.

2. Utilize Unified Frameworks to Regulate Key Aspects of Fundamental Research

We recommend that OSTP institute a cross-agency initiative to develop a unified regulatory framework to govern aspects of federally sponsored fundamental research. Such a framework would help to streamline and harmonize requirements and support cross-agency regulatory consistency, while still affording individual agencies the opportunity to tailor requirements to address project-specific needs and risks.

One example of this approach is the federal policy for the Protection of Human Subjects (the "Common Rule"), which serves as a foundational regulation for the conduct of research involving human subjects across multiple federal agencies. Another example is the OMB Guidance for Federal Financial Assistance ("Uniform Guidance"), which establishes a baseline framework for federal agency financial assistance management requirements and fosters more consistent policies across federal agencies. Additional areas of regulation in which this uniform approach could be implemented include:

- cybersecurity,
- financial conflict of interest,
- research security risk rubrics,
- dual use research of concern (DURC),
- pathogens with enhanced pandemic potential (PEPP), and
- public access to the results of federally sponsored research.

A unified federal regulatory framework, with OMB having the authority to ensure consistent implementation across the agencies, would foster efficiency. It would support specialized risk mitigation when needed, help research agencies manage their distinct operations more efficiently, and help academic research institutions effectively manage and pay for compliance.

3. Calibrate Research Regulations to Risk

Researchers cannot conduct cutting-edge research without some degree of risk. However, not all research-related risks are the same, and thus risk must be identified, assessed, and managed with controls that are calibrated to the likelihood and severity of that risk. Excessive regulation occurs when risks are overstated and/or the government seeks earnestly to anticipate and eliminate *all* risk, no matter how minor or unforeseeable. This is an impossible and stifling approach. Instead, regulators should calibrate regulation to risk.

4. Streamline and Harmonize Specific Regulations

COGR is working with its members to identify specific federal research regulations and requirements that would be substantially more effective and efficient if streamlined and harmonized. Examples include:

- applications for federal research funding,
- researcher biographical information,
- federal-wide research terms and conditions,
- fixed amount research award requirements,
- foreign gift reporting,
- financial payment systems,
- training requirements associated with research regulations, and
- standardized data elements across agencies.

We welcome the opportunity to discuss these and other requirements.

In conclusion, I must note that recent executive actions and federal agencies' implementation actions and communications have caused significant confusion and disruption to the conduct of research that is vital to national interests. We are particularly troubled by the sudden onset of stop work orders for certain types of research activities and OMB Memorandum M-25-13, which would have resulted in the temporary suspension of the obligation and disbursement of funds for a vast number of grant, loan, and other financial assistance programs. We appreciate the rescission of M-25-13 and urge immediate action to cancel stop work orders for research activities. COGR members will continue to honor the terms and conditions of federal grants and contracts, and we urge that the federal government reciprocate.

Thank you for considering our views. We stand ready to work with you to reduce federal red tape affecting research and to alleviate confusion and disruption during the transition and the implementation of new policies. Success on these fronts will help to reinvigorate the Partnership and its vital contributions to America's security, health, and economic competitiveness.

Sincerely,



Matt Owens, President

cc: Gary Washington, Acting Secretary, Department of Agriculture
Jeremy Pelter, Acting Secretary, Department of Commerce
Pete Hegseth, Secretary, Department of Defense
Ingrid Kolb, Acting Secretary, Department of Energy
Dorothy A. Fink, Acting Secretary of Health and Human Services
James Payne, Acting Administrator, Environmental Protection Agency
Matthew Memoli, Acting Director National Institutes of Health
Sethuraman Panchanathan, Director, National Science Foundation
Janet Petro, Acting Administrator, NASA
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