



January 29, 2025

The Honorable Donald J. Trump
President
United States of America
The White House

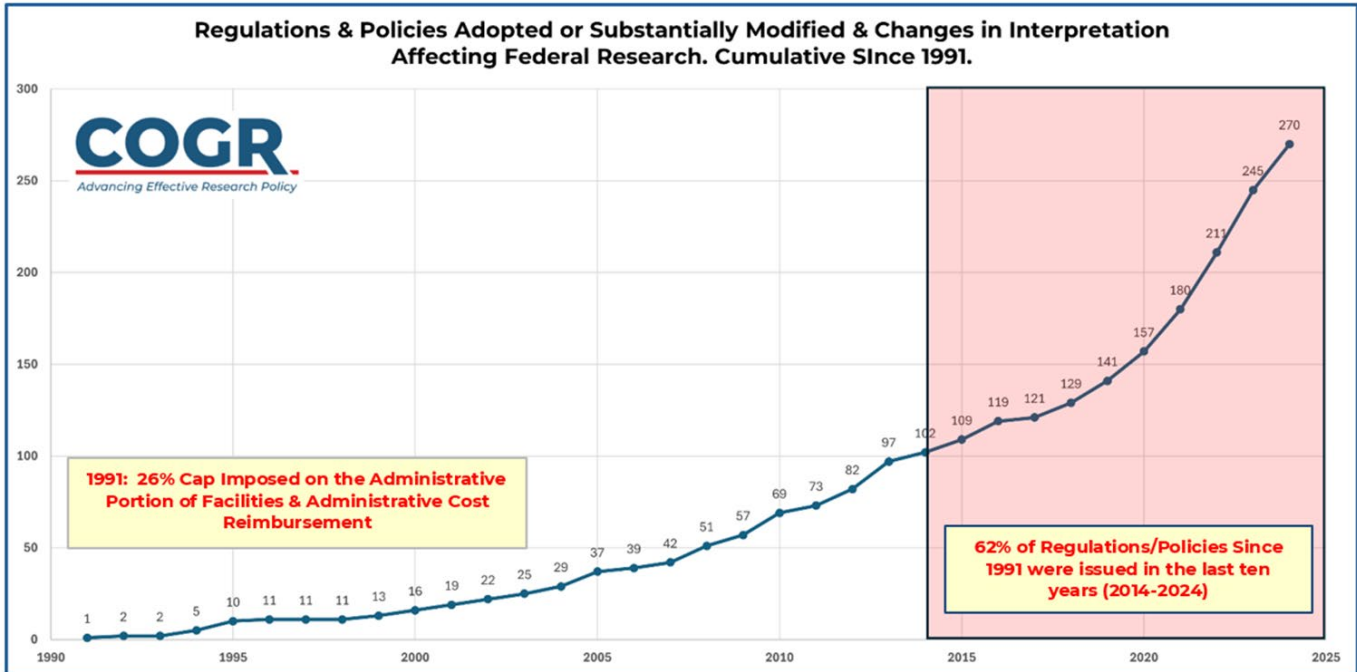
Dear President Trump:

Congratulations on your recent inauguration as our nation's 47th president. I write to offer COGR's assistance and provide 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.

Addressing federal research regulations is essential to strengthening the Partnership that has positioned the United States as the global science, technology, and innovation leader. We recognize regulation is necessary to ensure the responsible conduct of research and good stewardship of federal funds, but all too often the ability of researchers and their institutions to conduct research in the most effective manner is impeded by an ever-increasing number of overlapping and inconsistent regulations issued by multiple federal agencies.

From 1991-2024, 270 new or modified federal requirements and substantial updates to policies, business practices, and interpretations affecting the conduct of federal research have been implemented, and 62% of these were issued in the last 10 years (see chart below). Many of these requirements address the same or similar matters, but in different ways by multiple federal agencies. This requires research institutions to implement varying policies and procedures to comply. The continuing growth in requirements has led to increased compliance burden and costs. In fact, research institutions are paying an increasing share of the cost of conducting federally sponsored research, and this is driven in significant part by increased federal requirements and federal policies that cap reimbursement for administrative costs.



Source: <https://www.cogr.edu/changes-federal-research-requirements-1991>

Compliance with increased federal research requirements takes valuable time away from faculty researchers. According to the Federal Demonstration Partnership’s faculty workload survey, 44.3 percent of faculty research time is spent on administrative tasks¹. The increase in federal requirements continues to thwart the efforts of academic research institutions to minimize burdens on faculty researchers so they can spend more time conducting research. The regulatory trajectory and time lost by faculty to compliance activities are unsustainable if the U.S. is to retain its leadership in science, technology, and innovation.

We are grateful for the efforts of your first administration on the Joint Committee on the Research Environment (JCORE), which led to greater coordination and consistency for research security regulations. Similarly, your current administration can take actions on all research-related regulations, including: 1) creating a central mechanism to streamline and harmonize research regulations within the Office of Management and Budget; 2) utilizing unified frameworks to regulate key aspects of fundamental research; and 3) calibrating research regulations to risk. In a separate communication, I will provide leaders in your administration specific recommendations and additional information.

In closing, 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

¹ Federal Demonstration Project 2018 Faculty Workload Survey: <https://thefdp.org/wp-content/uploads/FDP-FWS-2018-Primary-Report.pdf>

terms and conditions of federal grants and contracts, and we urge that the federal government reciprocate.

We stand ready to work with your administration to reduce federal red tape affecting research. Reducing red tape is an imperative that will help accelerate scientific discoveries and the pace of innovation. It is also part of a winning strategy for reinvigorating the Partnership and research institutions and their vital contributions to America's security, health, and economic competitiveness. Thank you for considering our views.

Sincerely,



Matt Owens
President

cc: Matthew Vaeth, Acting Director, Office of Management and Budget
Michael Kratsios, Assistant to the President for Science and Technology Policy
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
Lynne Parker, Executive Director, President's Council of Advisors on
Science and Technology
Elon Musk, US DOGE Service