

#COGRJune24

Committee Reports & Hot Topics:

June 7, 2024

COGR



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COGR

Contracts & Grants Administration (CGA)
Leadership Transition

Jeffrey Friedland
University of Delaware



*Associate Vice President, Research
Administration (Chair since 2022)*

Stephanie Endy
Brown University



Associate Vice President for Research

Thank you
Jeff!

Welcome

Stephanie!

COGR

Welcome New COGR Board Members

Stephanie Gray
University of Florida



*Assistant Vice President,
Sponsored Programs*

Vivian Holmes
Massachusetts Institute
of Technology



*Executive Director, Research
Administration Services*

Craig Reynolds
Van Andel Institute



*Vice President for
Research Compliance*

COGR

Thank you for your service!



**Jeffrey Silber,
Cornell University**

COGR Board Chair 2022-2024

*Senior Director, Sponsored
Financial Services*

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Announcing COGR's FY 25-26 Board Chair



Naomi Schrag
Columbia University

*Vice President for Research,
Policy, & Training*

Welcome New COGR Members!



The University of Texas
Rio Grande Valley™



University of Maryland
CENTER FOR ENVIRONMENTAL SCIENCE



COGR

**Emerging Research Institutions
(ERI) Pilot Program**

Launching August 1, 2024

Looking Ahead

**COGR's October 24-25, 2024
in Washington D.C.**

Registration will open in August



Research, Ethics & Compliance (REC) Committee Members

- **Deborah Motton (Chair)**, *University of California*
- **Lynette Arias**, *University of Washington*
- **Kristin Bittinger**, *Harvard University**
- **Theresa Colecchia**, *Johns Hopkins University*
- **Grace Fisher-Adams**, *California Institute of Technology**
- **Karen Hartman**, *Mayo Clinic**
- **J.R. Haywood**, *Michigan State University**
- **Jennifer Lassner**, *University of Iowa*
- **Stacy Pritt**, *Texas A & M University*
- **Naomi Schrag**, *Columbia University*
- **Brian Smith**, *UC-San Francisco**
- **Geeta Swamy**, *Duke University*
- **Ara Tahmassian**, *Harvard University**
- **Debra Thurley**, *Pennsylvania State University**
- **Kristin West** (*COGR Director*)



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* At-large members



Research Ethics & Compliance

- **COGR Survey on Institutional Experiences with DOD/ARL/DARPA Risk Mitigation Programs & Follow-Up with DOD/ARL/DARPA – Cross-committee project. Survey conducted between March 14 – April 8, 2024.**
- THANKS to all the institutions who participated in the survey!!! **Key points from [survey results](#):**
 - Agencies do not provide plans for the development of risk mitigation plans;
 - Development and negotiation of plans can add 4-6 weeks to process, and negotiation is not always successful;
 - Agencies do not always clearly communicate why plan is necessary and whether/why draft plan is acceptable/unacceptable;
 - Common plan elements include reporting suspicious foreign contacts, risk awareness training, and ending collaborations with persons/entities on countries of concern
- **Key points from meeting with DOD/ARL/DARPA Representatives:**
 - DOD expects agencies to adopt policies that are consistent in terms of achieving overarching principles, but agencies may have different risk tolerance levels based on the research that will be reflected in funding decisions.
 - Every proposal and project is evaluated individually and because of this DOD is not likely to develop risk mitigation plan templates.
 - Risk mitigation areas: international travel (including personal travel in some cases), threat awareness training, collaborations (including co-authorships) with persons/entities on lists or in countries of concern
 - Representatives all support the concept of “getting to yes” and having efficient risk assessment and mitigation plan processes, BUT, many details are still being worked out.
 - If you don’t hear back on a submitted risk mitigation plan, but you get funded, this means your plan has been accepted.
 - For programs in which there are multiple awards, DOD may hold up on getting back to institutions to let them know their risk mitigation plans has been accepted, if one of the awardees has not yet been able to develop an acceptable plan.

Research Ethics & Compliance

- **New OSTP Dual Use Research of Concern (DURC) and Pathogens with Enhanced Pandemic Potential (PEPP) [Policy](#) and Implementation Guidance. Key points from meeting with Dr. Lauer:**
 - Much broader scope of agents and experiments covered means A LOT more work for Institutional Biosafety Committees (serving as IREs) in terms of projects requiring reviews. Grandfathering of current protocols unlikely.
 - May 2025 implementation date at the institutional level, not just the agency level.
 - NIH is working on an implementation plan. Look for a potential RFI in Autumn 2024.
 - Do not assume that amount thresholds currently in place under the select agent regulations will transfer to the implementation of this policy.

Research Ethics & Compliance

- **Recent Projects, Projects in Progress, and Projects On the Horizon:**

- CMS [RFI: Changes to Research Data Request & Access Policy](#) – Prohibits physical data extracts that researchers currently rely on and dramatically increases access fees. REC developed [comment letter](#) and COGR staff participated in joint association meeting with CMS. CMS has made clear that data security must be improved but seems willing to work with the community on alternative approaches.
- **ORI Research Misconduct Regulations:** COGR submitted [comments](#) on the NPRM at the end of 2023. Look for the final regulations this Summer! REC will analyze and provide guidance when they are issued.
- [Biden Admin. EO](#) (unpublished) and associated [DOJ ANPRM](#) (unofficial) on transfer of sensitive data to countries of concern. REC developed and submitted [comments](#). DOJ officials have followed up with COGR and asked to meet with staff on June 13 to discuss comments on data thresholds, which are very low for genomic data and identifiable health data.
- **DEA Rescheduling of Marijuana [NPRM](#):** Marijuana will go from federal Controlled Substances Schedule I to Schedule III. Security and inventory/recordkeeping requirements will be easier for researchers to comply with, which will make research projects easier. However, the ultimate impact on state regulatory regimes for marijuana is unknown.
 - REC Cannabis and Controlled Substances working group will be developing comments in response to the NPRM.

Contracts & Grants Administration (CGA) Committee Reports

- **Jeff Friedland, (Chair)** *University of Delaware*
- **Stephanie Endy,** *Brown University*
- **Michael Glasgow,** *University of Connecticut**
- **Walter Goldschmidts,** *Cold Spring Harbor Laboratory**
- **Stephanie Gray,** *University of Florida**
- **Charles Greer,** *University of California, Riverside*
- **Vivian Holmes,** *Massachusetts Institute of Technology**
- **Lisa Mosley ,** *Yale University*
- **Twila Reighley,** *Michigan State University*
- **Craig Reynolds,** *Van Andel Institute**
- **Jennifer Rodis,** *University of Wisconsin-Madison**
- **Pamela Webb,** *University of Minnesota**
- **Krystal Touns** *(COGR Director)*



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Contracts and Grants Administration

- **Uniform Guidance**
 - OMB Session
 - “Look” Series
- **NIH Updates**
 - Data management plan and sharing
 - Unilateral closeout
 - Research Security Program Guidelines - NIH Comments
 - ID.me
 - NIH Implementation of Common Forms

Contracts and Grants Administration

- **NSF Research Security Policy Updates**
 - Trusted Research Using Safeguards and Transparency
 - Foreign Financial Disclosure Reporting - Requirement
- **Research Environment (NSF Off campus safe working environment OIG Review)**
 - OIG Review of Recipients' Policies and Procedures Related to Harassment

Contracts and Grants Administration

Workplan for the Next Several Months

- SAM.gov
 - Member Survey
 - Response to request for comments
 - **Continue to escalate institutional cases (contact ktoups@cogr.edu)**
- Cross Cutting Issues
 - Uniform Guidance
 - Research Security (Implementation of Common Forms, FFDR/TRUST)

Contracts and Grants Administration

Projects On the Horizon for 2024

- Update [MANAGING EXTERNALLY FUNDED SPONSORED](#) (*last updated 2016*)
- Monitoring the use of OTAs, ARPA-H, HHS, DoD, NIH, NSF

Costing and Financial Compliance (CFC) Committee

Committee Members

- **Sarah Axelrod (Chair)**, *Harvard University*
- **Kimberly Croft**, *Massachusetts Institute of Technology**
- **Casey Erickson**, *University of Washington*
- **Jeremy Forsberg**, *University of Texas at Arlington*
- **MC Gaisbauer**, *University of California, San Francisco**
- **Joseph Gindhart**, *Washington University at St. Louis**
- **Michael Legrand**, *University of California, Davis**
- **Nate Martinez-Wayman**, *Duke University**
- **Julie Schwindt**, *University of Mississippi Medical Center**
- **Maria Soliman**, *University of Iowa**
- **Renotta Young**, *Columbia University**
- **David Kennedy** (*COGR Director*)

Costing & Financial Compliance (CFC)

AGENDA

- Priority Focus – UG
- Ongoing Topics
- Farewell to Dave

Costing & Financial Compliance (CFC)

Uniform Guidance

- Cross cutting with Contracts & Grants Administration (CGA)
- COGR – 1st, 2nd, 3rd, 4th looks & advocacy
- Meeting with DHHS/CAS
- Thursday session with OMB - reflections
- Priority issues
- Next steps

Costing & Financial Compliance (CFC)

Ongoing Topics

- F&A Survey
- Financial reporting developments at NASA
- CAS (potential) requirement to adjust indirect cost pools
- PII – Personal Identifying Information required for access to federal systems, specifically id.me
- Timeliness of F&A Cost Rate Negotiations
- F&A in the News

Research Security & Intellectual Property (RSIP) Committee Members

- **Jennifer Ponting (Chair)**, *University of Chicago*
- **Alexandra Albinak**, *Johns Hopkins University**
- **Hannah Carbone**, *California Institute of Technology**
- **Allen DiPalma**, *University of Pittsburgh*
- **Michael Moore**, *Augusta University**
- **Bruce Morgan**, *University of California, Irvine**
- **Dan Nordquist**, *Washington State University**
- **Elizabeth Peloso**, *University of Pennsylvania**
- **Sophia Herbert-Peterson**, *Georgia Institute of Technology*
- **Kenneth Porter**, *University of Maryland**
- **John Ritter**, *Princeton University**
- **Todd Sherer**, *Emory University*
- **Kevin Wozniak** (*COGR Director*)



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***At-large members**



WELCOME BACK!



Kevin Wozniak

*Director, Research Security & Intellectual
Property (RSIP)*

kwozniak@cogr.edu

Research Security & Intellectual Property (RSIP)

- COGR Survey on Research Institutions' Experiences with Department of Defense (DoD) Policy for Risk-Based Security Reviews of Fundamental Research (FR) and Follow-Up with DoD, Army Research Laboratory (ARL), and Defense Advanced Research Projects Agency (DARPA)
- NIST March-In Framework – *still no updates!*
- Earlier this month, NIST published the final versions of Special Publication (SP) 800-171r3 (Revision 3), Protecting Controlled Unclassified Information in Non federal Systems and Organizations, and SP 800-171Ar3, Assessing Security Requirements for Controlled Unclassified Information. – *Stay tuned for more information*

Research Security & Intellectual Property (RSIP)

Upcoming Comment Letters:

- Collaboration with Educause colleagues: Cyber Incident Reporting for Critical Infrastructure Act (CIRCI) - Reporting Requirements
- NIH Patient Access Plan requirements [Federal Register : National Institutes of Health \(NIH\) Office of Science Policy \(OSP\): Request for Information on Draft NIH Intramural Research Program Policy: Promoting Equity Through Access Planning](#)

Bills to Watch

- ENFORCE
- DETERRENT Act
- Baldwin Bill (i.e. “Invent here, Make here”)

Research Security & Intellectual Property (RSIP)



THANK YOU!



Alexandra Albinak

*Associate Vice Provost for Research
Administration*

Johns Hopkins University



John Ritter

*Executive Director, Office of
Technology Licensing*

Princeton University



Elizabeth Peloso

*Associate Vice President & Associate
Vice Provost*

Office of Research Services
University of Pennsylvania

CONGRATS



A top-down view of a wooden desk. In the upper right, a portion of a white laptop keyboard is visible, showing keys for a period, plus/equals, and minus/underscore. To the left of the keyboard is a yellow paperclip. In the center, three sticky notes are arranged horizontally. The leftmost note is pink and has a large black letter 'Q'. The middle note is light green and has a large black ampersand '&'. The rightmost note is pink and has a large black letter 'A'. In the bottom right corner, a silver ballpoint pen lies diagonally.

Q

&

A

COGR Staff Points of Contact

- **Matthew Owens, President:** mowens@coagr.edu
- **David Kennedy, Costing and Financial Compliance (CFC) Director:** dkennedy@coagr.edu
- **Krystal Toups, Contracts & Grants Administration (CGA) Director:** ktoups@coagr.edu
- **Kristin West, Research Ethics & Compliance (REC) Director:** kwest@coagr.edu
- **Kevin Wozniak, Research Security & Intellectual Property (RSIP) Director:** kwozniak@coagr.edu
- **Toni Russo, Asst. Director of Member Engagement & Policy:** trusso@coagr.edu
- **Mary Deans, Administrative Officer,** mdeans@coagr.edu
- **COGR Member Services:** memberservices@coagr.edu



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