



## Changes in Federal Research Requirements Since 1991

**Overview:** Research institutions take seriously their responsibility to conduct high-quality research, responsibly steward taxpayer research investments, and comply with all federal regulations and reporting requirements to ensure safety, security, and financial transparency and accountability. This is vital to the partnership between research institutions and the federal government and the partnership's ability to continue bolstering our nation's health, security, and economic prosperity.

The federal regulations, laws, policies, and guidance documents referenced below (collectively referred to as "Requirements") directly affect the conduct and management of federal research grants and contracts. Although requirements affecting research have been in place for decades, 1991 is the baseline year for this list. That year the federal government, by way of OMB Circular A-21 – now 2 CFR 200 – imposed the 26-percent cap on administrative costs that can be recovered under Facilities and Administrative (also known as F&A or Indirect) Cost<sup>i</sup> reimbursements by institutions of higher education. Consequently, almost every university – small and large – now subsidizes the cost of each new federal regulation imposed on institutions of higher education.

The Requirements in the document linked below have been implemented, amended, or are significant changes in the implementation or interpretation of the Requirements and associated management processes since 1991<sup>ii</sup>. [Figure 1](#) illustrates the cumulative total of these changes. In addition, we have included Figure 2 with an overlay of federal R&D expenditures as a percentage of the nation's gross domestic product (GDP) for 1991-2023 (Figure 2, included in the Word version for download)<sup>iii</sup>.

**It is important to note that while some regulations and business practices may have been reduced, superseded, or eliminated over the years, this list represents a cumulation of requirements since 1991 that have necessitated some level of analysis, response, implementation, changes in compliance, updated or new training, and/or updated or new systems by research institutions – all of which have costs.** This document is not meant to represent an exhaustive list of requirements with which institutions must currently comply. Additionally, some institutions may not be required to comply with every change on the list. It is important to note that compliance burden and costs vary by the scope and complexity of the individual Requirements and that many of the requirements listed below have never been assessed for their effectiveness.

COGR has long advocated for reduced administrative and cost burdens for U.S. institutions conducting federally funded research and has published several papers over the years detailing the cost of compliance and analyzing F&A cost reimbursement. Significant papers & resources include:

- [F&A Cost Reimbursement Education Materials](#), including the [F&A Survey Capstone Report \(2024\)](#)
- [Overview of OSTP Guidelines for Research Security Programs at Covered Institutions](#) (2024)
- COGR Responses to [2 CFR 200 Uniform Guidance \(2013, 2020, and 2024\)](#)
- [Data Management and Sharing and the Cost of Compliance \(2023\)](#)
- [Research Security and the Cost of Compliance: Phase I Report \(2022\)](#)
- Additional resources and information can be found on COGR's website at [www.cogr.edu](http://www.cogr.edu).

**New For This Update:**

- 2024 regulations/policies have been updated to include new additions since August 2024
- Cumulative graphic updated to highlight that the number of new/changed policies and regulations in the past ten years represents 62% of the total implemented or changed since 1991
- GDP numbers are updated with the most up to date information available
- Graphics now available for download
- Annual updates to this document will occur on an end-of-year schedule, so that totals are reflective of the full calendar year. Check back on [COGR's website](#) for the latest version. All previous versions have been archived.

[List of Changes in Federal Research Requirements Since 1991<sup>iv</sup> \(PDF Download\)](#)

[Graph Download, Figures 1 & 2 \(Word Version\)](#)

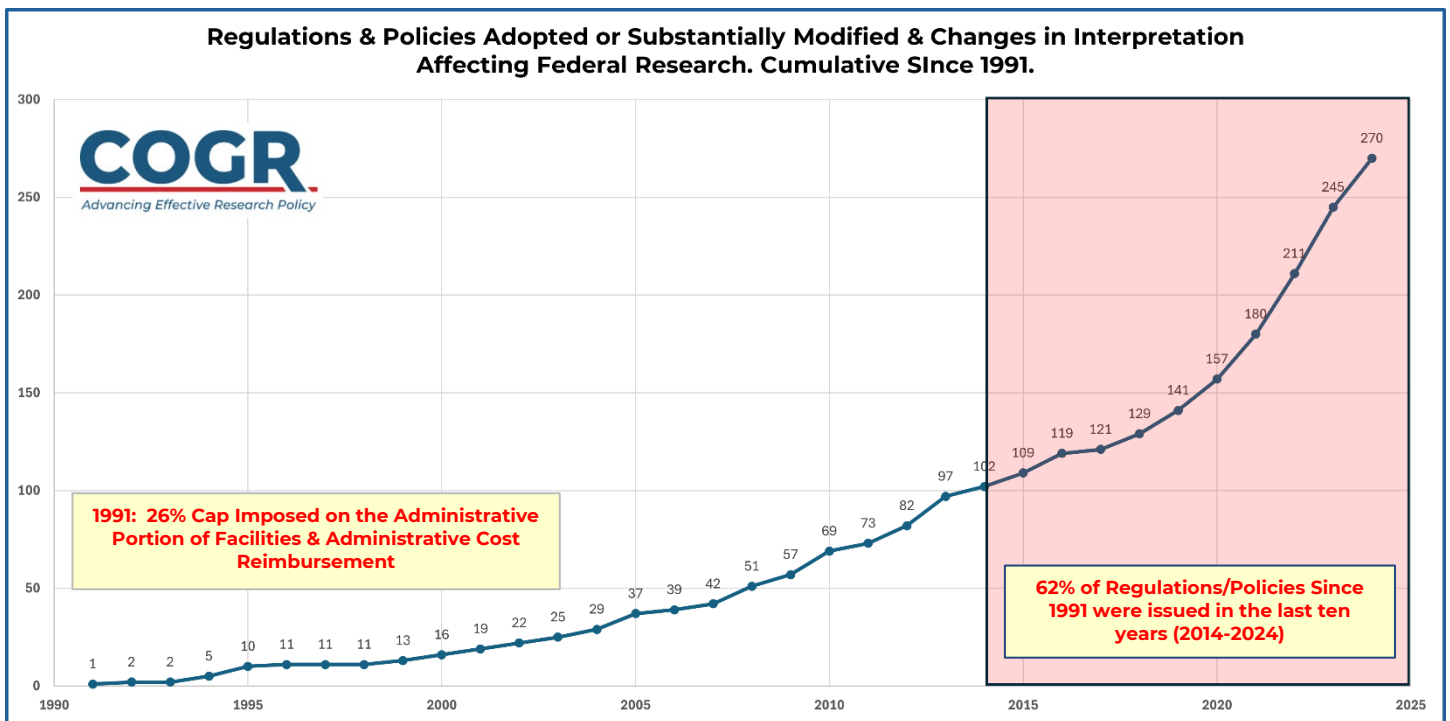


Figure 1. Regulations & Policies Adopted or Substantially Modified & Changes in Interpretation Affecting Federal Research. Cumulative Since 1991.

Figure 2. See Graph Download (Word Version). Figure 1 with GDP Overlay.

<sup>i</sup> 2 CFR 200 Appendix III to Part 200—Indirect (F&A) Costs Identification and Assignment, and Rate Determination for Institutions of Higher Education (IHEs)

<sup>ii</sup> The requirements listed in this section were deemed 'significant' if COGR developed and submitted a response or comment to the change (or changes).

<sup>iii</sup> Source: National Center for Science and Engineering Statistics, National Patterns of R&D Resources (annual series): <https://ncses.nsf.gov/pubs/nsf23339>

<sup>iv</sup> For non-commercial, educational use only. For use with proper attribution.