NASEM Committee on Improving the Regulatory Efficiency and Reducing Administrative Workload to Strengthen Competitiveness and Productivity of U.S. Research

May 21, 2025

COGR

Advancing Effective Research Policy

Actionable Ideas to Improve Government Efficiency Affecting the Performance of Research

Matt Owens
President

www.cogr.edu

www.linkedin.com/company/cogr

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Advancing Effective Research Policy

501 (c) (3) nonprofit association of leading research-intensive universities and affiliated medical centers and nonprofit research institutes

229 Members in 48 States & DC

161 Carnegie Research I Institutions

85 Private Research Institutions

144 Public Research Institutions

23 Affiliated Academic Hospitals and Research Institutes

$54 Billion+ in combined federal expenditures (2023 NSF HERD Survey)

96% of eligible institutions among top 100 & 85% of eligible institutions among the top 200 institutions are COGR members (*as measured in federal research expenditures*)

30+ Hispanic Serving Institutions (HSI)

1 Historically Black College & University (HBCU)

1 Predominantly Black Institution (PBI)

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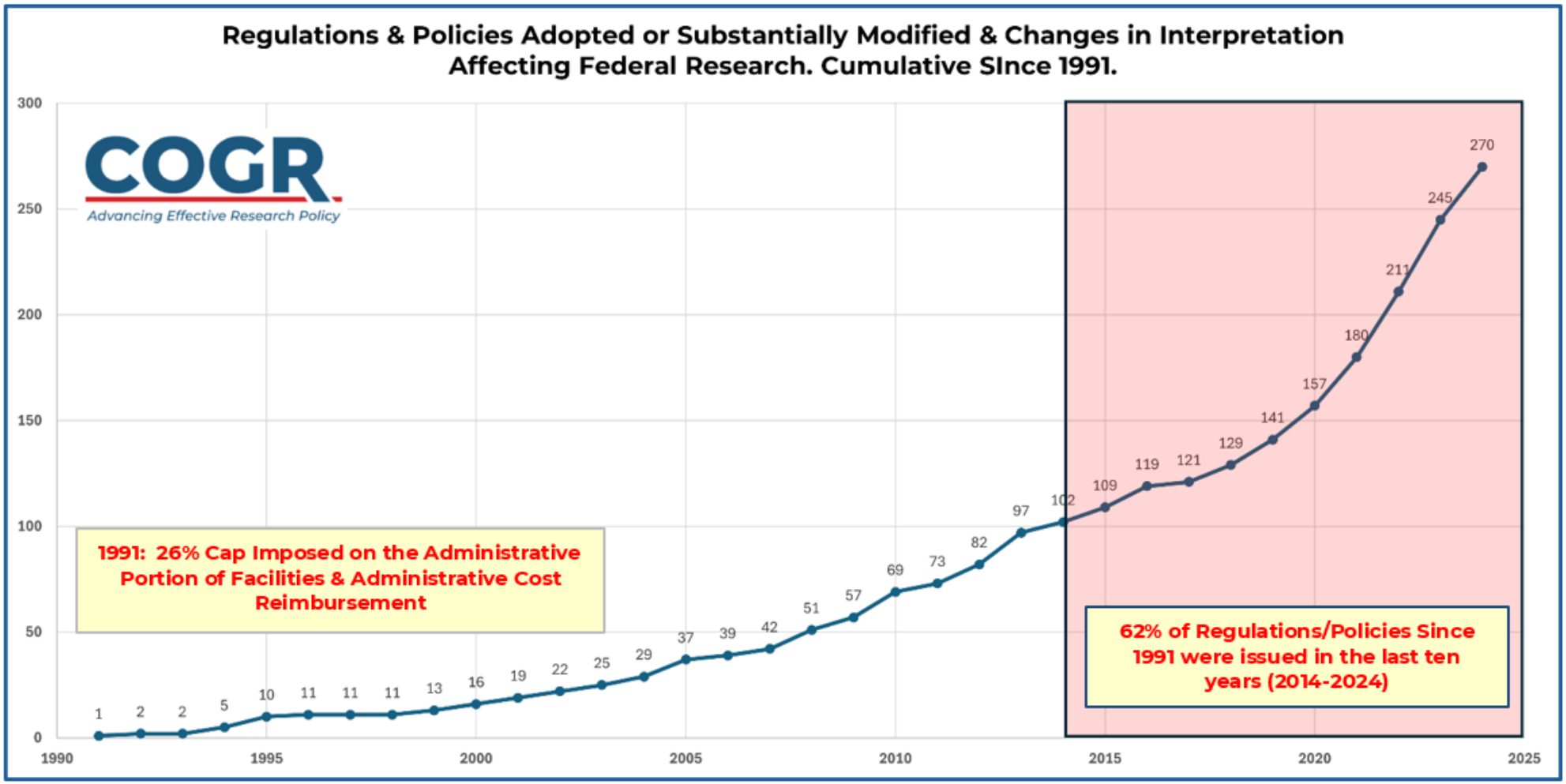
Advancing Effective Research Policy

COGR is the national authority on federal policies and regulations affecting U.S. research institutions.

Mission Statement

To empower an unparalleled U.S. academic research ecosystem by advancing sound federal policies and regulations that are vital to U.S. science and innovation leadership and our nation's health, security, and prosperity.

Changes in Federal Requirements Since 1991



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

COGR Recommendations to New Administration to Reduce Red Tape

- **Create a Central Mechanism to Streamline and Harmonize Research Regulations**
  - **Establish the Research Policy Board**
  - **Establish a position within OSTP for an associate director for the academic research enterprise**
- **Utilize Unified Frameworks to Regulate Key Aspects of Fundamental Research**
  - **Institute an OSTP led cross-agency initiative to develop a unified regulatory framework to govern aspects of federally sponsored fundamental research**
  - **Examples: "Common Rule" and the "Uniform Grant Guidance"**
- **Calibrate Research Regulations to Risk**
- **Streamline and Harmonize Specific Regulations**
  - **Applications for federal research funding, Biosketches, Fixed-amount awards, and more**

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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 ...ience 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 acc... ...unnecessari...	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 wi... current and pending support fro... federal granting agencies to el... need for recipien... to e... duplicate data ... Implement ... inst...

Process

- **Reviewed COGR letters, white papers, and guidance documents. Key examples:**
  1. 2016 COGR Chart Recent Legislative Actions Taken to Reduce Research Regulatory Burden - https://www.cogr.edu/sites/default/files/1Reg%20Reform%20Leg%20Matrix.pdf
  2. NIH on implementing the 21st Century Cures provisions 2018 - https://www.cogr.edu/sites/default/files/HHS%20and%20NIH%20Research%20Regulatory%20Reform_022818.pdf
  3. Other non-NIH recommendations on regulatory burden 2017 - http://www.cogr.edu/sites/default/files/Non-HHS%20Research%20Regulatory%20Reform_082417.pdf
  4. DOE-specific recommendations 2017 - https://www.cogr.edu/sites/default/files/AAA_APLU_COGR%20Comments%20on%20DOE%20Regulatory%20Reform_07_14_17.pdf
  5. F&A Costs and regulatory reform 2017 - https://www.cogr.edu/sites/default/files/COGR%20Discussion%20Points%20on%20FA%20and%20Regulatory%20Reform_082417.pdf
  6. DOD-specific issues related to financial assistance awards 2017 - https://www.cogr.edu/sites/default/files/DoDstaffinfinal4-5-17.pdf

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Process

- **Reviewed Analyses & Recommendations of Others. Key examples:**

1. Federal Research: Agencies Need to Enhance Policies to Address Foreign Influence GAO-21-130, https://www.gao.gov/products/gao-21-130 (2020).
2. Federal Demonstration Partnership 2018 Faculty Workload Survey (2018).
3. Reforming Animal Research Regulations: Workshop Recommendations to Reduce Regulatory Burden (2017)
4. National Academies Report Optimizing the Nation's Investment in Academic Research (2016)
5. Government Accountability Office report Federal Research Grants: Opportunities Remain for Agencies to Streamline Administrative Requirements (2016)
6. 21st Century Cures Act, section 2034, Reducing Administrative Burden for Researchers (2016)
7. National Science Board report Reducing Investigators' Administrative Workload for Federally Funded Research (2014)
8. Federal Demonstration Partnership Faculty Workload Survey Reports (2012)
9. National Academies Report Research Universities and the Future of America (2012)
10. NIH Initiative to Reduce Regulatory Burden (1999)

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Process

- Discussion, Engagement, and Review
  - COGR Staff Experts and Expert Consultant
  - COGR Committees Discussions
    - Costing & Financial Compliance Committee
    - Contracts & Grants Administration Committee
    - Research Ethics & Compliance Committee
    - Research Security & Intellectual Property Committee
  - COGR Board of Directors

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May 7, 2025

For questions about this table, contact memberservices@cogr.edu.

https://www.cogr.edu/cogr-submits-response-omb-rfi-deregulation-0

NO.	TOPIC		REGULATION & SOURCE AUTHORITY	INITIAL GOAL(S)	RFI CATEGORY	ISSUE/WHY IT'S NOT WORKING	IMPROVING EFFICIENCY
1	**Biosketch and Current and Pending Support Reporting Requirements**	**REGULATION**	NDAA 2021 Section 223, https://www.congress.gov/116/plaws/publ283/PLAW-116publ283.pdf p. 3470	Develop a single format, across all agencies, for researchers to provide their professional credentials and other research funding.	The cost of agency variations exceeds the benefits to the public.	Not all agencies have implemented the NSTC Common forms. Those that have implemented the forms require non-standard data elements. Lack of harmonization across agencies creates inefficiency, impeding full automation and complicating 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. Definition of "gifts" that can be excluded from reporting does not conform with definition of "gifts" used by the Internal Revenue Service.	Implement the final NSTC forms across all 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 populate 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."
2	**Research Project Proposal Development**	**POLICY**	NSF PAPPG Proposal Preparation - https://www.nsf.gov/policies/pappg/24-1/ch-2-proposal-preparation#d-proposal-contents-171 NIH Grant Proposal Guide – How to Apply - https://grants.nih.gov/grants-process/write-application/how-to-apply-application-guide NASA Grant and Cooperative Agreement Manual - https://www.nasa.gov/wp%20-content/uploads/2025/03/gcam-mar-2025.pdf?emrc=982b64 Other federal agencies like USDA, DOE and DOD have unique program-specific guides. Public Law 106-107, also known as the Federal Financial Assistance Management Improvement Act of 1999 - https://www.govinfo.gov/content/pkg/PLAW-106publ107/pdf/PLAW-106publ107.pdf	Provide federal agencies with the information they need to review, evaluate, and select research projects for funding[i].	The cost of implementing disparate agency variations far outweighs the benefits to the public.	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.
3	**EPA Regulations That Impact Academic Research Facilities**	**REGULATION**	Revision to Toxic Substances Control Act (TSCA) - Revision to Risk Determination for Methylene Chloride - https://www.epa.gov/system/files/documents/2022-11/MC_Final%20Revised%20RD_10.26.22-final%20%281%29.pdf 40 CFR 702 - https://www.ecfr.gov/current/title-40/chapter-I/subchapter-R/part-702	To facilitate health and safety of members of the public exposed to this chemical.	Regulations are duplicative and burdensome to US businesses.	Methylene Chloride (also known as dichloromethane or DCM) is one of the most commonly used solvents in laboratories. The EPA put TSCA revisions 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 revoked in 2025. https://www.federalregister.gov/documents/2021/01/25/2021-01765/protecting-public-health-and-the-environment-and-restoring-science-to-tackle-the-climate-crisis Methylene chloride is currently regulated under OSHA Regulations at 29 CFR 1919.112. The duplicative regulation by the EPA is unnecessary, particularly in laboratory settings designed to protect workers or where personal protective equipment standards are enforced. https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.119	Remove the EPA standard and let the current regulation by OSHA stand as is.

Recommendations

1. **Biosketch and Current and Pending Support Reporting Requirements**
   - Implement the final NSTC forms across all 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 populate 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.

2. **Research Project Proposal Development**
   - 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.
   - No additional training will be required unless a project is awarded.

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Recommendations

3. **EPA Regulations That Impact Academic Research Facilities**
   - Remove the EPA standard and let the current regulation by OSHA stand as is.
4. **Agency support for federal assistance awards, including proposal submission portals, grants management systems, and billing and financial reporting systems.**
   - Select and develop one portal for all federal grant applications.
   - All federal portals should utilize Login.gov and permit multiple institutional administrative contacts.
   - All federal payment systems should support bulk upload or an API for efficient data entry.
   - Streamline and standardize reporting and billing for assistance awards to eliminate duplicative financial reporting.
5. **Financial Conflicts of Interest**
   - Implement one FCOI policy to govern all federally funded research based on the NSF Policy.
   - Alternatively, if PHS policy is utilized as the model, eliminate the requirement for disclosure of sponsored / reimbursed travel.
   - Consolidate existing reporting to one federal agency that collects the information needed.
   - Limit FCOI training to one time before the first 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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Recommendations

6. **Research Misconduct**
   - Adopt a “common rule” approach to administering research misconduct proceedings by having all executive branch agencies and departments sign on to a single rule governing these proceedings, similar to the common rule approach used for human subject research protections at 45 C.F.R. Part 46.
   - Use the Public Health Service Administration’s regulations at 42 C.F.R. Part 93 (“PHS Policy”) as this “common rule” because it is comprehensive, prevalent, and was very recently subject to notice and comment rulemaking.
7. **iEdison Reporting**
   - 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
8. **Human Subject Research Protections Under the Common Rule and FDA Regulations**
   - Establish FDA as the sole federal agency regulating human subject research concerns for clinical investigations subject to FDA jurisdiction.
   - Establish the Common Rule as the regulation that governs human subjects research that do not involve FDA regulated test articles.

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Recommendations

9. Animal Welfare Act and PHS Policy for Humane Care and Use of Laboratory Animals

- 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 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.

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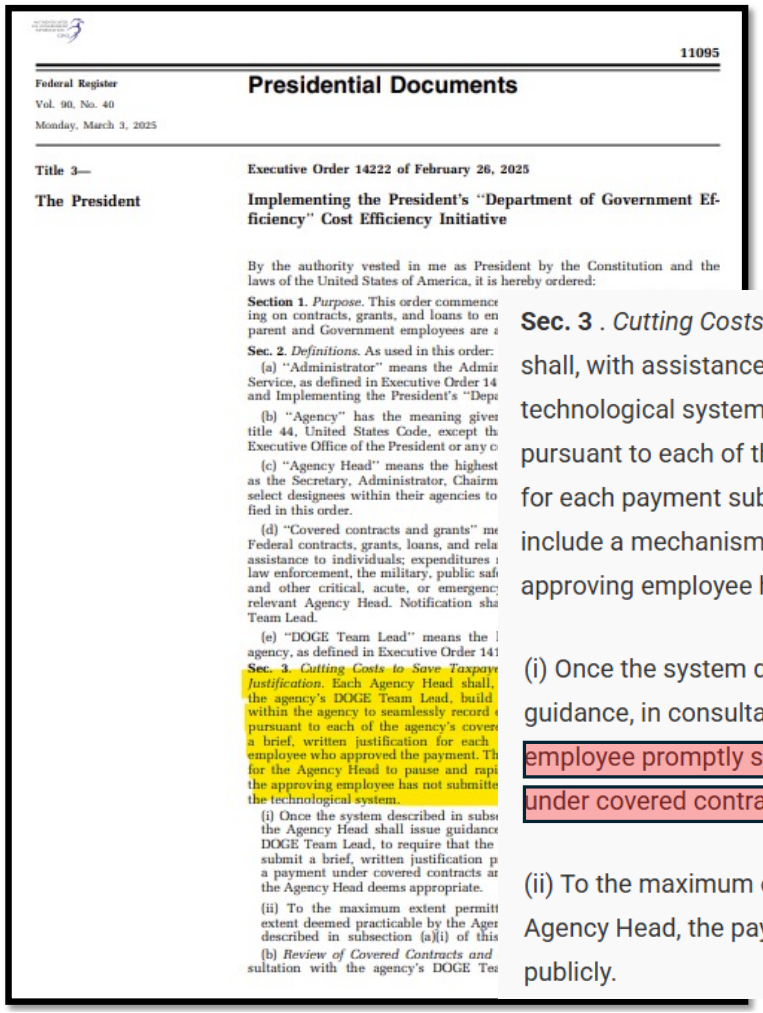

11095

Federal Register
Vol. 90, No. 40
Monday, March 3, 2025

Presidential Documents

Title 3—
The President

Executive Order 14222 of February 26, 2025

Implementing the President's "Department of Government Efficiency" Cost Efficiency Initiative

By the authority vested in me as President by the Constitution and the laws of the United States of America, it is hereby ordered:

Section 1. *Purpose.* This order commence ing on contracts, grants, and loans to en parent and Government employees are

Sec. 2. *Definitions.* As used in this order:

(a) "Administrator" means the Admir Service, as defined in Executive Order 14 and Implementing the President's "Depa

(b) "Agency" has the meaning give title 44, United States Code, except th Executive Office of the President or any c

(c) "Agency Head" means the highest as the Secretary, Administrator, Chairm select designees within their agencies to fied in this order.

(d) "Covered contracts and grants" me Federal contracts, grants, loans, and rela assistance to individuals; expenditures law enforcement, the military, public saf and other critical, acute, or emergenc relevant Agency Head. Notification sha Team Lead.

(e) "DOGE Team Lead" means the agency, as defined in Executive Order 141

Sec. 3. *Cutting Costs to Save Taxpaye Justification.* Each Agency Head shall, the agency's DOGE Team Lead, build within the agency to seamlessly record pursuant to each of the agency's cover a brief, written justification for each employee who approved the payment. Th for the Agency Head to pause and rapi the approving employee has not submitte the technological system.

(i) Once the system described in subs the Agency Head shall issue guidanc DOGE Team Lead, to require that the submit a brief, written justification p a payment under covered contracts ar the Agency Head deems appropriate.

(ii) To the maximum extent permitt extent deemed practicable by the Age described in subsection (a)(i) of this

(b) *Review of Covered Contracts and* sultation with the agency's DOGE Tea

EO 14222: IMPLEMENTING THE PRESIDENT'S "DEPARTMENT OF GOVERNMENT EFFICIENCY" COST EFFICIENCY INITIATIVE

Sec. 3 . *Cutting Costs to Save Taxpayers Money.* (a) *Contract and Grant Justification.* Each Agency Head shall, with assistance as requested from the agency's DOGE Team Lead, build a centralized technological system within the agency to seamlessly record every payment issued by the agency pursuant to each of the agency's covered contracts and grants, along with a brief, written justification for each payment submitted by the agency employee who approved the payment. This system shall include a mechanism for the Agency Head to pause and rapidly review any payment for which the approving employee has not submitted a brief, written justification within the technological system.

(i) Once the system described in subsection (a) of this section is in place, the Agency Head shall issue guidance, in consultation with the agency's DOGE Team Lead, to require that the relevant agency employee promptly submit a brief, written justification prior to that employee's approval of a payment under covered contracts and grants, subject to any exceptions the Agency Head deems appropriate.

(ii) To the maximum extent permitted by law, and to the maximum extent deemed practicable by the Agency Head, the payment justifications described in subsection (a)(i) of this section shall be posted publicly.

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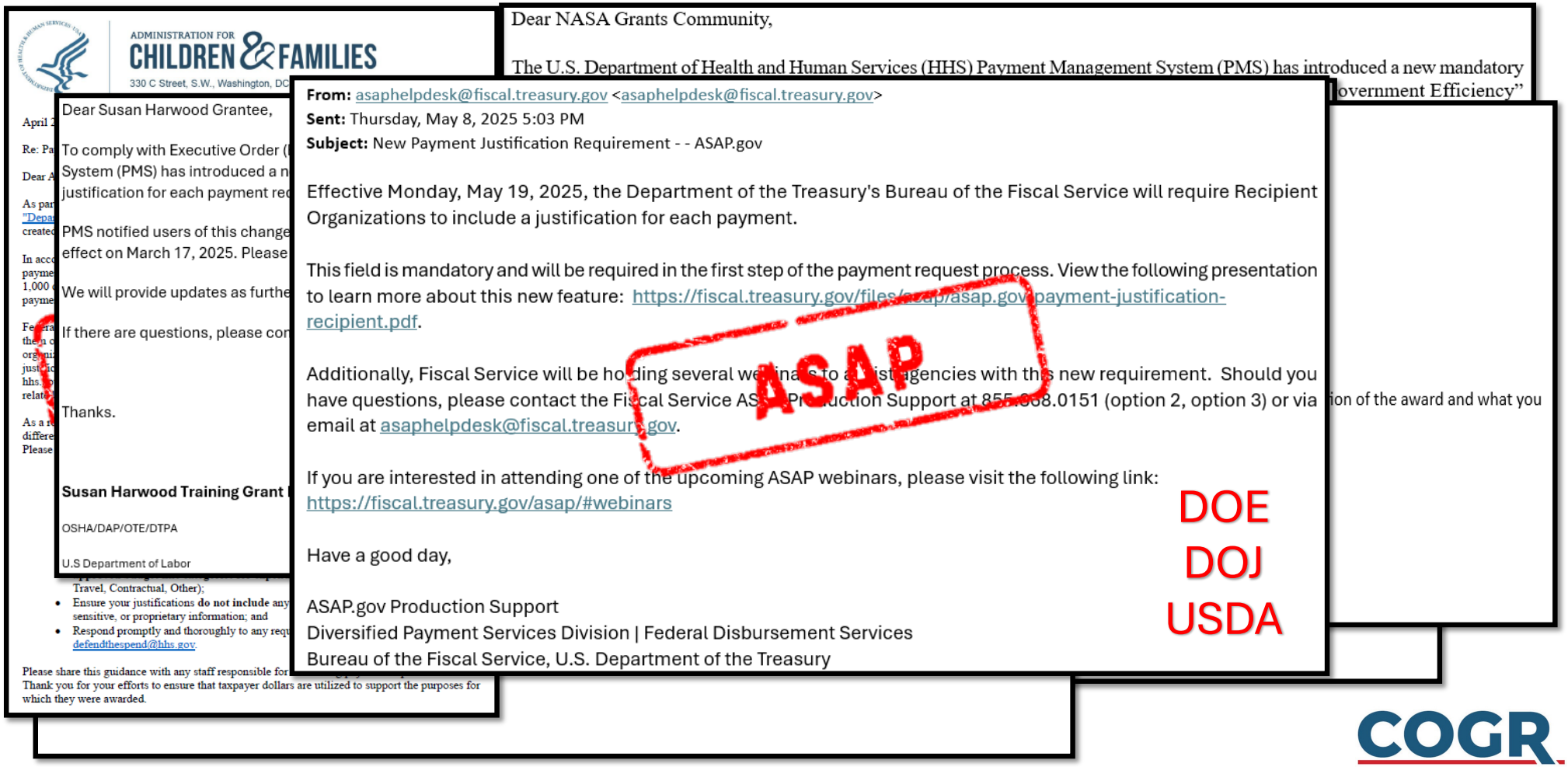
ADMINISTRATION FOR CHILDREN & FAMILIES
330 C Street, S.W., Washington, DC
Dear Susan Harwood Grantee,
To comply with Executive Order
System (PMS) has introduced a n
justification for each payment rec
PMS notified users of this change
effect on March 17, 2025. Please
We will provide updates as furthe
If there are questions, please con
Thanks.
Susan Harwood Training Grant
OSHA/DAP/OTE/DTPA
U.S Department of Labor
Travel, Contractual, Other);
Ensure your justifications do not include any
sensitive, or proprietary information; and
Respond promptly and thoroughly to any requ
defendthespend@hhs.gov.
Please share this guidance with any staff responsible for
Thank you for your efforts to ensure that taxpayer dollars are utilized to support the purposes for
which they were awarded.
Dear NASA Grants Community,
The U.S. Department of Health and Human Services (HHS) Payment Management System (PMS) has introduced a new mandatory
overnment Efficiency"
From: asaphelpdesk@fiscal.treasury.gov <asaphelpdesk@fiscal.treasury.gov>
Sent: Thursday, May 8, 2025 5:03 PM
Subject: New Payment Justification Requirement - - ASAP.gov
Effective Monday, May 19, 2025, the Department of the Treasury's Bureau of the Fiscal Service will require Recipient Organizations to include a justification for each payment.
This field is mandatory and will be required in the first step of the payment request process. View the following presentation to learn more about this new feature: https://fiscal.treasury.gov/files/asap/asap.gov_payment-justification-recipient.pdf.
Additionally, Fiscal Service will be ho ding several we ina s to a ist agencies with th s new requirement. Should you have questions, please contact the Fi cal Service AS P Pr uction Support at 855.868.0151 (option 2, option 3) or via email at asaphelpdesk@fiscal.treasur gov.
ion of the award and what you
If you are interested in attending one of the upcoming ASAP webinars, please visit the following link: https://fiscal.treasury.gov/asap/#webinars
Have a good day,
ASAP.gov Production Support
Diversified Payment Services Division | Federal Disbursement Services
Bureau of the Fiscal Service, U.S. Department of the Treasury
ASAP
DOE
DOJ
USDA

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Image credit: Microsoft

"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."

- COGR 1/29/25 letter to President Trump

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