

## Report on Research Compliance Volume 19, Number 12. November 23, 2022

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By Theresa Defino

### **COGR Survey Finds ‘Significant, Concerning’ Costs Connected to Disclosure Requirements**

The Council on Governmental Relations (COGR) is sounding an alarm regarding costs institutions have expended to comply with “new and clarified provisions calling for researchers to disclose all sources of research support and all types” imposed by NIH, the National Science Foundation (NSF) and other federal agencies to address inappropriate foreign influence on research. COGR surveyed 22 institutions with annual federal research and development expenditures of \$100 million or greater and four with less than that amount about their expenditures during fiscal year 2022 to 2023. This is the first fiscal year after NIH, NSF and the Office of Science and Technology Policy “took steps toward harmonizing and clarifying” the requirements, according to COGR.

Disclosure-associated costs ranged “from an average of over \$100,000 for smaller institutions to over \$400,000 for mid-size and large institutions. Although some of these expenses are one-time costs, a sizeable portion will be annual recurring compliance costs,” the report states. “Overall, the cost impact to research institutions in year one is expected to exceed \$50 million. Further, all research institutions will experience significant cost burden and administrative stress, and smaller research institutions with less developed compliance infrastructure may be disproportionately affected.” COGR said it hopes the report “will both encourage and facilitate discussions of equitable cost allocation, as well as how the costs of research security compliance “should be considered and measured.”

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