March 7, 2012

Daniel I. Werfel
Controller
Office of Management and Budget
725 17th Street, NW
Washington, D.C. 20025


Dear Mr. Werfel:

On behalf of the Association of American Universities (AAU), the Association of Public and Land-grant Universities (APLU), the Council on Governmental Relations (COGR) and the Association of Independent Research Institutes (AIRI), we are writing to request an extension of the deadline for submission of comments in response to the Office of Management and Budget’s (OMB) Advanced Notice of Proposed Guidance (ANPG) and request for comments concerning Reform of Federal Policies Relating to Grants and Cooperative Agreements: Cost Principles and Administrative Requirements (including the Single Audit Act) (Federal Register, February 28, 2012). Specifically we request that an additional 30 days be provided to allow our associations and the institutions we represent sufficient time to analyze fully and effectively comment on the proposals put forward in the ANPG. This would set April 30, 2012 as the new deadline for comments on the ANPG.

Together, our four associations represent most major research universities and independent research institutions in the United States. The Association of American Universities (AAU) represents 59 leading U.S. public and private universities and is devoted to maintaining a strong national system of academic research and graduate education. The Association of Public and Land-grant Universities (APLU) is a research and advocacy organization of 217 members, consisting of public research universities, land-grant institutions, and state university systems providing a forum for the discussion and development of policies and programs affecting higher education and the public interest. The Council on Governmental Relations (COGR) is an association of 183 research universities and affiliated academic medical centers and research institutes. COGR concerns itself with the impact of federal regulations, policies, and practices on the performance of research conducted at its member institutions. The Association of Independent Research Institutes (AIRI) is a national organization of over 80 independent, non-profit research institutes that perform basic, clinical and translational research in the biological and behavioral sciences.
Our members and the grantee community need more than 30 days to consider the reform ideas outlined by OMB and assess the impact of the broad proposals for standardized information collection, the development of a risk-based model for Single Audits, and new administrative approaches for the allocation of Federal funds on our recipient communities. OMB poses questions and requests specific information that requires a thorough and detailed analysis for the preparation of our responses. A 30 day extension of the comment period will help to ensure thoughtful responses for OMB’s consideration.

We greatly appreciate your consideration of our request.

Sincerely,

Hunter R. Rawlings III  
President  
Association of American Universities

Anthony DeCrappeo  
President  
Council on Governmental Relations

Peter McPherson  
President  
Association of Public and Land-grant Universities

Larry Keinath  
President  
Association of Independent Research Institutes