



August 15, 2025

The Federation of American Societies for Experimental Biology (FASEB) appreciates the opportunity to provide feedback on the Joint Association Group on Indirect Costs (JAG) proposed Financial Accountability in Research (FAIR) model as a new method for determining the facilities and administration costs (F&A or indirect costs) associated with conducting federally funded research. As a coalition of 22 scientific societies representing over 110,000 individual scientists across biological and biomedical research disciplines, our comments reflect the feedback of Principal Investigators (PIs) funded by agencies including the National Institutes of Health (NIH), National Science Foundation (NSF), Department of Agriculture, Department of Energy (DOE), and Department of Veterans Affairs. Several members of our Board of Directors and Science Policy Committee also hold senior roles within their institution, including department chairs, center directors, Vice Presidents and Provosts, thus bringing unique perspectives to this conversation.

FASEB applauds the efforts of JAG, particularly those of the subject-matter expert team, to explore and develop alternative approaches for determining F&A costs in a manner that is both streamlined and more transparent. Although prompted by draconian efforts by the administration to apply a flat 15 percent F&A rate to research funded by NIH, NSF, DOE, and the Department of Defense, the existing mechanism by which institutional F&A rates are calculated and applied is long overdue for updates. We also recognize that this is still a work-in-progress that requires additional testing. Thus, while FASEB appreciates the approach and many elements of the FAIR model, we also offer several areas needing clarification or additional revision to promote transparency for PIs applying for federal funds, to minimize administrative burden for PIs, and to ensure equitable calculation of F&A expenses across institutions.

Feedback on what the FASEB community likes about the FAIR model

FASEB's volunteer leadership agrees that the FAIR model serves as a significant step in increasing transparency in the costs incurred as F&A and calculating how these are reimbursed as real costs associated with conducting federally funded research. As presented, the model addresses the major concerns expressed by critics of the current approach for determining institutional F&A rates. More broadly, the efforts of JAG and the resultant FAIR model have prompted important discussions about the institutional costs associated with conducting research across a broad range of stakeholders in the research community.

Feedback on what the FASEB community dislikes about the FAIR model

In its review of the FAIR model, FASEB's volunteer leadership highlighted several areas requiring additional clarification or for which data from a broader range of institutions would be necessary to ensure the model could be applied in an equitable manner. A recurring concern was the increased administrative burdens for not only grants administration staff but also individual PIs to determine the costs associated with the four subcategories of the model's Essential Research Performance Support (ERPS).

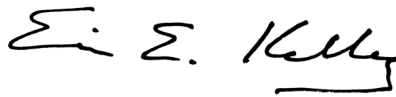
Similarly, given that our community represents researchers from large, research-intensive institutions as well as those from smaller, teaching-focused or less-resourced institutions, there were questions about

whether the model could appropriately reflect that range or whether there was a risk of administration reviewers flagging higher ERPS costs at institutions with less research activity. One possible resolution for this latter point was the suggestion to test the model by factoring the total number of grants supported at the institution into ERPS calculations.

Finally, several of our volunteer leaders expressed concerns about the ability of institutions to manipulate the model for economic benefit. The extent to which this comment recurred within our discussions highlights that there is still work to be done in terms of the transparency of ERPS calculations and even those associated with an institution's General Research Operations to avoid unjustified manipulation. A resource such as the forthcoming *Guide to the Financial Accountability in Research (FAIR) Model* mentioned during the August 13 Town Hall hosted by the American Association for the Advancement of Science (AAAS) will be crucial for assisting PIs and research administrators in determining appropriate costs within each ERPS category.

We appreciate the opportunity to provide input on this important work. This is a critical moment for the research community, and FASEB supports JAG's continued efforts to ensure appropriate financial support for federally funded research projects.

Sincerely,

A handwritten signature in black ink, reading "Eric E. Kelley". The signature is written in a cursive, flowing style. The first name "Eric" is written with a large, stylized "E". The middle initial "E." is written with a small "E" and a period. The last name "Kelley" is written with a large, stylized "K" and a long, horizontal stroke at the end.

Eric E. Kelley, PhD
FASEB President